

File No. 221033

Committee Item No. _____

Board Item No. 23

COMMITTEE/BOARD OF SUPERVISORS

AGENDA PACKET CONTENTS LIST

Committee: _____

Date: _____

Board of Supervisors Meeting

Date: November 15, 2022

Cmte Board

- | | | |
|--------------------------|-------------------------------------|--|
| <input type="checkbox"/> | <input type="checkbox"/> | Motion |
| <input type="checkbox"/> | <input type="checkbox"/> | Resolution |
| <input type="checkbox"/> | <input type="checkbox"/> | Ordinance |
| <input type="checkbox"/> | <input type="checkbox"/> | Legislative Digest |
| <input type="checkbox"/> | <input type="checkbox"/> | Budget and Legislative Analyst Report |
| <input type="checkbox"/> | <input type="checkbox"/> | Youth Commission Report |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Introduction Form |
| <input type="checkbox"/> | <input type="checkbox"/> | Department/Agency Cover Letter and/or Report |
| <input type="checkbox"/> | <input type="checkbox"/> | MOU |
| <input type="checkbox"/> | <input type="checkbox"/> | Grant Information Form |
| <input type="checkbox"/> | <input type="checkbox"/> | Grant Budget |
| <input type="checkbox"/> | <input type="checkbox"/> | Subcontract Budget |
| <input type="checkbox"/> | <input type="checkbox"/> | Contract/Agreement |
| <input type="checkbox"/> | <input type="checkbox"/> | Form 126 – Ethics Commission |
| <input type="checkbox"/> | <input type="checkbox"/> | Award Letter |
| <input type="checkbox"/> | <input type="checkbox"/> | Application |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Public Correspondence |

OTHER

- | | | |
|--------------------------|-------------------------------------|---|
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | FYI Hearing Referral - 10/21/22 |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | Planning Department RTC on Draft EIR 2022 Housing Element |
| | | Update - 11/2/22 |
| <input type="checkbox"/> | <input type="checkbox"/> | _____ |
| <input type="checkbox"/> | <input type="checkbox"/> | _____ |
| <input type="checkbox"/> | <input type="checkbox"/> | _____ |
| <input type="checkbox"/> | <input type="checkbox"/> | _____ |

Prepared by: Lisa Lew

Date: November 10, 2022

Prepared by: _____

Date: _____

BOARD of SUPERVISORS



City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102-4689
Tel. No. (415) 554-5184
Fax No. (415) 554-5163
TDD/TTY No. (415) 554-5227

MEMORANDUM

TO: Rich Hillis, Director, Planning Department

FROM: Jocelyn Wong, Legislative Clerk
Board of Supervisors

DATE: October 21, 2022

SUBJECT: Hearing - Committee of the Whole - Draft Housing Element 2022 Update -
November 15, 2022, at 3:00 p.m.

The Board of Supervisors has received the following hearing request, introduced on October 18, 2022:

File No. 221033

Hearing of the Board of Supervisors sitting as a Committee of the Whole on November 15, 2022, at 3:00 p.m., during the regular Board of Supervisors meeting, to hold a public hearing on the draft Housing Element 2022 Update, including its goals, objectives, policies, and actions; and requesting the Planning Department to report; scheduled pursuant to Motion No. M22-162 (File No. 221032), approved on October 18, 2022.

If you have any comments or reports to be included with the file, please forward them to me at the Board of Supervisors, City Hall, Room 244, 1 Dr. Carlton B. Goodlett Place, San Francisco, CA 94102 or by email at: bos.legislation@sfgov.org.

c: Corey Teague, Planning Department
Tina Tam, Planning Department
Lisa Gibson Planning Department
Devyani Jain, Planning Department
AnMarie Rodgers, Planning Department
Dan Sider, Planning Department
Aaron Starr, Planning Department
Joy Navarrete, Planning Department
Elizabeth Watty, Planning Department

Lew, Lisa (BOS)

From: BOS Legislation, (BOS)
To: Major, Erica (BOS); Emily Murase; BOS Legislation, (BOS)
Subject: RE: [JTF] Concerns about Housing Element's Impact on Japantown

From: Emily Murase <emurase@japantowntaskforce.org>
Sent: Wednesday, November 2, 2022 7:38 PM
To: Major, Erica (BOS) <erica.major@sfgov.org>
Cc: Emily Murase <emurase@japantowntaskforce.org>
Subject: Fwd: [JTF] Concerns about Housing Element's Impact on Japantown

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

Hello, I would like to submit these materials to the Land Use and Transportation Committee as public comment, in advance of the 11/15 meeting where the Planning Department is expected to present on the Housing Element. Kindly include it in the public record for that meeting. Thank you!

Members of the Board of Supervisors Land Use and Transportation Committee:

On behalf of the Japantown Task Force, I am writing to you to express **concerns about the San Francisco Housing Element's impact on Japantown**. We wanted to provide you with these concerns in advance of the **11/15 Land Use and Transportation Committee meeting** where the Planning Department will be presenting the latest draft.

1. Despite the Housing Element's focus on racial and social equity, Japantown finds itself in the predicament of being a community of color which has been eviscerated by government policy, but sits on a major transit corridor that is targeted for more housing. Consequently, the Housing Element proposes to upzone the Japantown malls superblocks along Geary Boulevard **by increasing the height limit to 240 feet and removing density limits**. It also proposes **increasing the height limit on other commercial blocks north of Post Street to 85 feet**. These changes could result in devastating impacts to Japantown, with dramatically taller buildings and **more than doubling the current housing supply**, which will unfairly overburden the community, given its small footprint. Although more housing, especially affordable housing, is needed in Japantown, we want to ensure that the community determines if and how Japantown will be rezoned to accommodate such housing. This was sprung on Japantown in the Draft EIR released in April 2022, with no advance warning to the community.
2. Although the Housing Element states that Japantown, as a Priority Equity Geography (or Area of Vulnerability) would **not be rezoned** unless requested by the community, the Housing Element has **already** signaled to property owners that the City is contemplating height limit increases, which will lead to **speculation and increases in property value**.
3. Given Japantown's history, especially during the Redevelopment/urban renewal period, **the community lacks trust in the City to protect it from gentrification and displacement**. For example, the Housing Element calls for the community to produce a set of community benefits to mitigate the effects of new development with increased affordable housing, so that the approval of such projects can be streamlined. However, there is no guarantee that even if the community could come to an agreement on such a community benefits package, that the package will be accepted as feasible by the City or by developers.

Additional details about these core concerns can be found in the attached 4 comment letters that have been submitted to the Planning Department/Commission. Planning Department staff members have confirmed receipt of these letters and we have been in regular communication with them. We are seeking assurances that proposals directly impacting Japantown, in particular rezoning proposals, will be brought to the Japantown community early and be open to dialogue. For example, we were quite dismayed to see the 240 feet height limit proposal without prior consultation. Nevertheless, we applaud the equity orientation of the Housing Element, and believe that the Housing Element and related plans represent an opportunity for the City to restore trust among members of the Japantown community and beyond.

Please let me know if you have any questions or concerns that I can address in advance of the 11/15 meeting.

Regards,

Emily

Emily M. Murase, PhD

ムラセ エミリー

Executive Director

Japantown Task Force, Inc.

[1765 Sutter Street, 3rd Floor](#)

[San Francisco, CA 94115](#)

[www.japantowntaskforce.org](#)

415.346.1239 (Office)

415.297.3975 (Cell)

Rich Hillis
Director
San Francisco Planning Department
via email

March 25, 2022

Dear Director Hillis:

The Japantown Task Force (JTF) would like to thank the Housing Element team members for their outreach and engagement with the Japantown community in developing an unprecedented housing plan centered on social justice and equity to guide San Francisco housing policy and programs over the next eight years.

The Land Use and Transportation Committee of the Japantown Task Force reviewed the Housing Element Draft 2 and would like to offer the following feedback. Please note that the truncated timeline made it challenging for us to discuss Draft 2 with the broader Japantown community. We encourage the Planning Commission to continue to emphasize targeted outreach with San Francisco communities as more drafts are developed.

POLICIES OF NOTABLE JTF SUPPORT

Policy 10 and Policy 11 – Urban Renewal in the Western Addition during the 60's and 70's caused destruction and human trauma to the thriving Japanese American and African American communities in Japantown and the Fillmore, so we appreciate government recognition for inflicting these harms and a commitment towards repairing them. Policy 10's support for the development of land trusts and community ownership is crucial for community determination in Japantown and a goal that is highlighted both in the Japantown Cultural Heritage and Sustainability Strategy (JCHESS) Report, as well as the developing Cultural History, Housing, and Economic Sustainability Strategies (CHHESS) Report. By conducting a study to engage with Certificate of Preference Holders and their descendants, Policy 10 will support Japanese American and African Americans who were forcibly displaced by urban redevelopment. Community engagement should be an important part of creating and implementing the Certificate of Preference Study.

Policy 36 and 37 – Policies that reinforce cultural identity, expression, and activities support the sustainability of an authentic Japantown and are essential to Japantown's survival as a Cultural District.

Policy 15, 16, 17 and 18 – The inclusion of Japantown as a Priority Equity Geography supports our goal to preserve and develop as an authentic and dynamic Cultural District, specifically: expanding permanently affordable housing investments (15), improving access to well-paid jobs and business ownership for communities of color (16), investing in infrastructure (17), and tailoring zoning changes to serve the specific needs of communities of color.

Policy 22 – Dedicated funding streams for permanent supporting housing would significantly support community members who work in Japantown, including nonprofit and small business

workers. This would also support Japanese Americans and their descendants who were forcibly displaced by urban redevelopment that would like to return to Japantown.

JTF POINTS OF CRITIQUE

Policy 6 and Policy 11 – We recommend care in considering how Policy 6, regarding non-discrimination, might conflict with Policy 11's reparations practices, including engaging with Japanese American and African American Certificate of Preference holders.

Policy 25 – While we agree that reducing development constraints and streamlining entitlement and permitting processes will support the establishment and development of housing and businesses in Japantown, we feel community engagement is a crucial checks and balance to protect vulnerable neighborhoods like Japantown. Requiring early, pre-design engagement from developers could help balance these interests and pave the way for successful development. In addition, helping neighborhoods create an area plan could help to promote community engagement without increasing developer constraints.

Policy 32 and Policy 33 – It is important to maintain vehicular access and parking to Japantown until robust regional and local transit becomes a reliable and adequate substitute. The Japanese American incarceration, as well as urban redevelopment, severely harmed Japantown as a residential neighborhood and forced Japanese Americans to settle away from Japantown. Japantown remains a destination point that Japanese Americans will travel to from far across the Bay Area. Vehicular access is important for Japanese Americans to be able to return to and continue to access Japantown.

Policy 20 – The Japantown Task Force would suggest amending this to “consider increasing” density. Community engagement with neighborhoods is critical to assess the impact of increased density on those neighborhoods.

NEW POLICY RECOMMENDATION

We recommend that the Planning Commission consider adding a policy that would support neighborhoods in Priority Equity Geographies to develop their own Area Plans. This would support neighborhoods like Japantown in guiding future growth, development, and infrastructure, while facilitating the streamlining of lengthy development processes.

Thank you again for your continued engagement with and support of Japantown in your outreach efforts.

Sincerely,

A handwritten signature in blue ink, appearing to read "Emily Ph. Nguyen".

Executive Director

Cc: Kimia Haddadan
Shelley Caltagirone
Malena Leon-Farrera

Rich Hillis
Director, San Francisco Planning Department
Via email

April 29, 2022

Dear Director Hillis:

The Japantown Task Force (JTF) would like to thank the Planning Department and Housing Element team members for their continued outreach and engagement with the Japantown community in the development of San Francisco's Housing Element 2022 Update. The Land Use and Transportation Committee of JTF has reviewed the Housing Element Draft 3 and would like to share the following comments. We were once again challenged with conducting broad community engagement on this latest update, particularly given the simultaneous impacts of Redistricting and the Cherry Blossom Festival over the past several weeks. We appreciate and look forward to future outreach to Japantown and other San Francisco communities as part of the EIR process as well as the next phase of the Racial and Social Equity Action Plan.

Policy 5 (Reparations Programs), Policy 11 (Homeownership programs designed around reparations framework), Policy 12 (Investment in cultural anchors):

JTF appreciates the equity-centered policies designed to repair past harm caused by discriminatory governmental actions, including the WWII incarceration and Urban Renewal/Redevelopment. In particular, we support the expanded and more aggressive approach to Certificates of Preference holders and their descendants, not only identifying them and making them aware of opportunities, but also creating effective homeownership programs such as financial assistance for second loans and down payment assistance to lower barriers to homeownership.

Policy 20 (Rezoning Program): Changes in height and density were controversial as part of the Better Neighborhood Plan (BNP) effort in Japantown in 2011. There was heavy opposition to the proposed towers of 150' - 250' and, more importantly, a resulting lack of trust due to a flawed process. As a result, the BNP failed to galvanize community support.

While the potential Housing Element height increases are more modest, because of the community's memory, we anticipate the need to engage and educate the community around the proposed rezoning impacts and strongly encourage resourcing clear communication and visualization of height and density changes to promote clarity and understanding. We note that in recent community discussions to develop the CHHESS in collaboration with the Mayor's Office of Housing and Community Development, the community has expressed a strong desire for affordable housing, workforce housing, young families, and housing for descendants of Certificate of Preference holders.

Impact to Existing Merchants and Small Businesses: JTF urges care in the assessment and remediation of risks to existing merchants in culturally significant districts so that housing developments do not inadvertently displace existing merchants. For example, avoid implementing development financing that prevents leasing space to “low credit” (i.e., small) business.

Thank you again for your continued engagement with and support of Japantown in your outreach efforts. We especially appreciate the responsiveness of your team, copied below.

Sincerely,



Emily M. Murase
Executive Director

Cc: Kimia Haddadan
Shelley Caltagirone
Malena Leon-Farrera

Rachael Tanner
President
San Francisco Planning Commission
Via email

June 21, 2022

Dear President Tanner:

The Japantown Task Force (JTF) has prioritized engaging in the public process to develop San Francisco's 2022 Housing Element Update (SFHE) and we thank the Planning Department, and the Housing Element Update team in particular, for connecting with and listening to community stakeholders in good faith.

Overview

A subcommittee of the JTF Land Use and Transportation Committee conducted a review of the Draft Environmental Impact Report (DEIR) and shared its findings with the full Land Use Committee, the Ad-Hoc Technical Committee on the Japan Center Malls, and the JTF Board of Directors. We are concerned that the proposals it encompasses could exert extreme development pressure and harmful impacts on Japantown.

As you know, Japantown is one of only three remaining Japantowns in the United States and became the City's first Cultural District in 2013, a designation designed to preserve and stabilize at-risk areas of unique cultural heritage. It is also a community that has been eviscerated by racist government policy, most recently through City sanctioned urban renewal that reduced Japantown from 40 blocks to its current core of 6 city blocks, displacing hundreds of families and businesses in the process.

We support the need of every neighborhood – including Japantown – to share the responsibility of addressing the very real housing crises. We also support creating more opportunities for the Japanese American community to return to and reside in Japantown after being forcibly removed and displaced, both by the race-based and wholly unwarranted wartime incarceration and the City's redevelopment programs. **However, we think the DEIR contains proposals that unfairly overburden Japantown.** JTF would like to note the following of particular concern:

- 1) **Dramatic Increases to Height Limits and Lifting of Density Limits** – Figure 2-7 (Volume 1, page 185) shows an almost five-fold increase in height limits along Geary Boulevard between Laguna and Fillmore Streets, from the current 50' limit to 240'. The DEIR also shows a 70% increase to existing height limits one block north of Post Street, between Laguna and Webster Streets, from the current 50' limit and lifts housing density limits for all of these blocks.

The combination of these upzoning changes could result in **more than doubling** the housing supply in Japantown by 2050 – an increase of 2,700 more housing units by 2050 – representing a **108% increase** above the 2,500 units as of 2021 and allowing 400 more housing units by 2050 than the 2014 Housing Element. These changes could lead to significant impacts on 1) cultural and historic resources, 2) transportation and circulation, 3) shadow, and possibly 4) wind. And yet, there are NO analyses of these potential impacts in the DEIR.

It is important to note that, in the March 2022 SF Housing Element draft Sites Inventory and Rezoning Program Report, potential height limit increases for Japantown were between 55' and 85', NOT 240' and 85'. ***There was no communication with Japantown on showing these significant changes in the DEIR before its publication.***

- 2) **Singled out for Significant Growth** – Of the three Cultural Districts impacted by the DEIR (the others being the Castro and Sunset Chinese Cultural Districts), Japantown is the only community that is expected to absorb massive growth.
- 3) **Elimination of Community Engagement** – Japantown is designated as a potential Housing Sustainability District which could result in ministerial approvals for projects that meet the 20% affordable unit benchmarks. This would presumably supplant any community engagement for potentially significant development and impacts, stripping the community of any self-determination.

At the same time, the Housing Element includes policies that seek to redress harm to the Japanese American community caused by past discriminatory government actions. Our previous comment letter expressed our recognition and support for these policies. However, the above proposals in the DEIR are in direct conflict with the equity-centered values of the Housing Element Update.

Furthermore, the mitigation measures included in the DEIR are not adequate to address the potential impact of the significant changes shown in the report. **Such dramatic changes, as noted above, warrant further impact analyses. This is the basis of the following comments, recommendations, and requests for clarifications.**

Comments/Request for Clarification/Recommendations

1. How were the increased building heights and housing units for Japantown determined? What unit size(s) were assumed?
2. How would the Housing Sustainability District considered for Japantown be applied to future housing development? Would the 20% affordability requirement be applied to NEW housing development? The proposed 20% seems to be too low, especially given

the disproportionate impacts on Japantown, the forced removal of Japanese Americans from Japantown, and the subsequent loss of generational wealth resulting from displacement caused by governmental actions.

3. The DEIR states that the increased height limits and density in Japantown will lead to development pressure which will result in a greater probability that historic buildings in Japantown may be altered, demolished, relocated, and/or added to vertically or horizontally. Yet, the SFHE Update includes policies that seek to address harm to American Indian, Black, *Japanese*, Filipino and other communities brought by past discriminatory government actions. The Historic Preservation Commission approved two resolutions (Resolutions 0746 and 1127) that sought redress of such harms by calling on the Planning Department to develop proactive strategies to address structural and institutional racism, including improving efforts to collaborate with community members to identify and safeguard aspects of tangible and intangible heritage associated with marginalized racial and social groups, including Asian and Pacific Islander communities. This would also involve considering EIR alternatives for building projects that would produce significant impacts on historic resources.
4. There are myriad cultural assets and anchors in Japantown that have been carefully documented (i.e. Japantown Historic Context Statement, the 2013 Japantown Cultural Heritage Economic Sustainability Strategy or JCHESS). Although 72% of Japantown parcels lie within the City's first Cultural District, the DEIR notes that 73% of Japantown's historic aged parcels have not yet been evaluated for their historic significance. Yet, without evaluation, the DEIR states that only 4% of Japantown's Cultural District are likely to be historic resources. It is imperative that the evaluation of historic aged parcels in Japantown for their historic significance be completed before housing projects are considered. The impacts on Japantown's historic resources are not limited to individual buildings and sites; they extend to the entire cultural district's tangible and intangible historic resources. Therefore, historic buildings and other spaces should be preserved and not lost or adversely changed. Such buildings should NOT be demolished or changed in such ways that would be incompatible with the existing historic character of Japantown.
5. The DEIR proposes mitigation measures to address adverse impacts on historic resources. They do not go far enough to uphold the Historic Preservation Commission's Resolutions 0746 and 1127 to remedy past injustices. How will the redress policies and affordability requirements protect Japantown from the impacts of the significant increase in building heights and densities on its historic resources and cultural district?
6. The City should take a very rigorous and diligent approach with property owners/developers who want to change Japantown's historic and cultural assets. The community should be informed and involved early in the planning and design process, so that important historic and cultural assets in Japantown be preserved for future generations. Property owners/developers should work together with the community on

height, density, location, as well as air quality, noise, vibration, water, power, and health impacts on the community.

7. The City must require that current residents of buildings affected by proposed housing projects should not be displaced and be allowed to safely relocate during construction and be guaranteed housing in the proposed project upon completion at the same rent.
8. The City should require that individual housing projects in Japantown incorporate design features that would ensure that the safety of pedestrians, bicyclists and drivers are protected.
9. The City should consider the overall future parking demand in Japantown resulting from the significant increase in housing proposed under the SFHE Update policies, when evaluating the parking demand of individual building projects and their transportation impacts, as well as when considering changes to the Japantown garage. Given the importance of the retail and cultural spaces in Japantown, and the need to accommodate parking for visitors from across the City and Bay Area region, it is imperative that the Japantown garage supply NOT be decreased and be sized to adequately meet the future parking demand of residents, workers, and visitors to Japantown.
10. The DEIR should provide more comprehensive analyses of shadow impacts in areas most impacted by the SFHE Update policies, such as Japantown. Notably, the current DEIR does NOT include a shadow analysis of the City-owned Peace Plaza, historically significant open space dedicated to the cultural life of Japantown. In addition to analyzing impacts on publicly-owned parks and open spaces, the DEIR should evaluate the impacts of taller buildings on privately owned public open spaces and overall access to sun within buildings such as in common and recreational spaces, as they become more essential to the quality of life with greater housing and population density.
11. The City should consider requiring integration of common recreational/open spaces as part of new developments that increase housing density significantly. For example, if the Japan Center Malls were to be replaced with tall dense housing and retail space, there could be rooftop or mid-section/terraced open green spaces that provide access to fresh air, daylight, and nature.
12. Given the high concentration of seniors in Japantown, consideration should be given to ensuring that access to sun, air and light is maximized, given that seniors are more impacted by building shadows due to their limited mobility.
13. The DEIR should provide wind analyses of taller buildings in Japantown, and that stronger mitigation measures be proposed. The cumulative wind impacts of taller buildings on the small Japantown footprint must be evaluated in the DEIR, and particularly, the relative wind impacts as experienced by seniors and children. Further,

the wind impacts of individual building projects should be evaluated and designed to avoid Significant wind impacts generated by taller buildings.

14. The DEIR states that the City will acquire and develop more parks and open space, as well as public services facilities, such as fire stations, police stations, schools and libraries, to meet the increased demand. There is no detail in the DEIR about where such facilities would be located in or near Japantown. This merits further clarification.

Again, we fundamentally support the need for expanded housing in Japantown. However, we request that the above additional points of analyses and clarifications be completed to make the Environmental Impact Report more comprehensive than it is currently. In its present state, the DEIR is vague, incomplete, and potentially very damaging to San Francisco Japantown. We look forward to your response to our requests, recommendations, and comments.

Sincerely,



Emily M. Murase
Executive Director

Cc: Rich Hillis
Julian Banales
Shelley Caltagirone
Jonas Ionin
Elizabeth White

October 14, 2022

San Francisco Planning Commission
Rich Hillis, Director of Planning
VIA EMAIL

RE: San Francisco Housing Element Update, Draft 4 and Companion Documents

Dear Director Hillis:

The Japantown Task Force (JTF) commends the Housing Element team members on the continued focus of the Housing Element on racial and social equity to guide San Francisco housing policy and programs over the next eight years.

Upon reviewing Draft 4 (October 2022) of the Housing Element Update and its companion documents, the Land Use and Transportation Committee of JTF offers the following feedback on behalf of the JTF board of directors. Given the seven-day comment period, it was incredibly challenging for us to provide commentary on Draft 4, and virtually impossible to discuss Draft 4 with the broader Japantown community. Therefore, we continue to encourage the Planning Department and Commission to conduct targeted outreach with San Francisco communities, in order to ensure that community needs are reflected in the Housing Element. Given that Draft 4 of the Housing Element *Goals/Objectives/Policies/Actions* (Goals/Objectives) remains largely unchanged from Draft 3 released in March, our comments focus on the *Site Inventory/Rezoning Program* (Site Inventory/Rezoning) and *Analysis of Governmental and Non-Governmental Constraints* (Constraints Analysis) documents, which were substantially revised and expanded from the March drafts.

COMMENTS ON SITE INVENTORY/REZONING REPORT

Bigger Gap to Close with Rezoning by January 31, 2026

Compared to the March Site Inventory/Rezoning report, the October Site Inventory/Rezoning report shows a larger gap (34,183 units vs. 22,558 units) between the RHNA (Regional Housing Needs Allocation) to San Francisco and the amount of housing the City is projecting to be built under current zoning and City/State law. The October report notes that, in order to close the gap, the City must complete rezoning sites to increase the amount of allowable housing by January 31, 2026, or three years after the statutory deadline for the Housing Element approval/certification by the State. Given the ambitious citywide rezoning program laid out in the report, we hope that the Planning Department utilizes all of the tools at its disposal to educate and engage the public about the implications of such rezoning.

We also recommend that the Planning Department coordinate its rezoning program with other City agencies, who will be responsible for designing and implementing public improvements and enhanced City services needed to accommodate and mitigate the impacts of such rezoning, such as transit, open space, and streetscape.

Rezoning Program's Applicability to Priority Equity Geographies

Like the March report, the October Site Inventory/Rezoning report calls for rezoning sites along transit corridors, such as Geary Boulevard. However, the October report states that the Rezoning Program will not include "Priority Equity Geographies" or Areas of Vulnerability, which include Japantown, **unless requested through community-led processes** (bold text for emphasis). We appreciate this clarification, since it was not stated in the March report or the April Draft EIR analysis.

Taller Height Limits along Major Transportation Corridors

Notwithstanding the qualifier noted above, the October Site Inventory/Rezoning report shows three Rezoning Scenarios that proposes more housing along Geary in Japantown. All three scenarios show taller height limits along Geary than was shown in the March report. They show **height limit increases from the current 50' height limit to a new 240' height limit**, compared to the new height limit of 85' in the March report. Two of the scenarios (A and B) show increases in height limits to 240' for property within 800' of Geary Boulevard, as well.

As expressed in our June comment letter on the Draft EIR, we are gravely concerned about this dramatic increase in height limits (almost five-fold) along Geary Boulevard between Laguna and Fillmore streets, and the disproportionate impacts that such buildings and the additional housing and population could have on Japantown. Dramatic height limit increases could lead to significant impacts on (1) cultural and historical resources, (2) transportation and circulation, (3) shadow, and possibly (4) wind. We understand that any increases in height limits would be undertaken at the community's request, but we are concerned about the signals to property owners that the report sends about the potential height limit increases and the concomitant increases in property value.

Form-Based Density Controls

As noted in the March report, the October Site Inventory/Rezoning report proposes removing density controls based on lot size along Geary in Japantown and allowing property owners to accommodate as many housing units that make sense within the building envelope, as prescribed by height and bulk limits and setbacks. This would mean more housing density within the taller 240' height limits on property along Geary. For Scenarios A and B, more housing would be allowed within the taller 240' height limits on property within 800' of Geary as well.

As stated above, we are gravely concerned about the disproportionate impacts that the additional housing and density accommodated under both increased building heights and form-based density controls would have on Japantown.

Protecting Japantown from Designation as a Housing Sustainability District

The March report and the April Draft EIR showed Japantown as a potential Housing Sustainability District, which could result in ministerial approvals for projects that meet the 20% affordable unit benchmarks. In our June comment letter on the DEIR, we expressed concern about such designation and how it would presumably supplant any community engagement for potentially significant development and impacts, stripping the community of any self-determination.

The October report notes that areas vulnerable to displacement, such as Japantown, would not be designated as a Housing Sustainability District. If this understanding is correct, we appreciate the October report's protection of Japantown and other areas vulnerable to displacement from being designated a Housing Sustainability District. We would appreciate confirmation that our understanding is correct.

COMMENTS ON CONSTRAINTS ANALYSIS

Compared to the March 2022 Analysis of Governmental and Non-Governmental Constraints (Constraints Analysis), the October 2022 Constraints Analysis has been expanded to address in greater detail the constraints to housing production and policies/actions designed to reduce such constraints. We appreciate the clear summary of each constraint and the policies/actions that would reduce such constraints laid out in the October analysis.

Area Plans

In March, we sent a comment letter on Draft 2 of the Housing Element which recommended adding a policy that would support neighborhoods in Priority Equity Geographies, such as Japantown, to develop their own Area Plans.

Instead of Area Plans, the October Constraints Analysis offers a compromise approach to neighborhoods like Japantown, which states that in order to ensure that long-range planning processes do not exacerbate existing political struggles and animosity and result in delay of housing approvals and increased community discontent, Policy 29 in the Housing Element calls for **community-led processes** in Priority Geographies (such as Japantown) **that provide defined community benefits or mitigations for effects of new development with increased affordable housing**, in order to reduce burdens on advocates of vulnerable populations and community members, and establish more predictable outcomes for housing applications.

Our interpretation of this policy and actions is that in Priority Geographies, such as Japantown, *in lieu of an Area Plan*, the community would produce a set of community-informed community benefits in advance of individual housing projects, which would be incorporated into individual

projects, so that community members would not have to advocate or fight for the inclusion of such benefits in the project. In those cases, the project approval would be streamlined, including reducing notification requirements, consolidated appeal hearings, or ministerial approvals (no Planning Commission hearings).

If this interpretation is correct, we surmise that this policy and actions assume that the Japantown community can come to an agreement on a package of community benefits that will sufficiently mitigate concerns about new development. We expect that this will be challenging to accomplish, especially given the multiple impacts from new development and viewpoints/stakeholders in the community. There's also no guarantee that this package of community benefits will be accepted as feasible by the City or by developers.

Any discussion of community benefits should be preceded by a community-wide discussion of the values and vision for Japantown's future physical footprint. Such a discussion would occur through an area planning process or similar process.

Although the Constraints Analysis references the fact that the Better Neighborhoods Plan in Japantown was not approved, the Japantown community built on the Better Neighborhoods Plan to create the Japantown Cultural Heritage and Economic Sustainability Strategy (JCHESS) in 2013, and we would like to complete our vision planning efforts with the creation of an area plan. Therefore, we urge the Planning Department and Commission to work with the Japantown community on creating an area plan.

Development Agreements

The October Constraints Analysis discusses the challenges that projects on large sites with Development Agreements face when substantial investments in infrastructure, streets, parks, and other community facilities are required.

In Japantown, the Hotel Kabuki/Malls/Kabuki Theater blocks (Malls blocks) spanning Laguna to Fillmore streets between Geary Boulevard and Post Street could be developed in the future, and would likely be subject to a Development Agreement, which is a mutual contract between the City and private parties. Given the City-owned Japan Malls parking garage and the City-owned Peace Plaza Park on these blocks, substantial development on these blocks would likely involve substantial investments in rebuilding the garage and the Peace Plaza.

The October Analysis points out that Policy 24 promotes mixed-income development projects that maximize permanently affordable housing balanced against other permanent community benefits. It calls for public-private partnership solutions to front-end the necessary funding for infrastructure investments to expedite housing for large development agreement projects. Such funding could include Infrastructure Financing Districts, Tax Increment Financing, or other methods to provide direct City investment allocation of public financing.

Development of the Malls blocks will likely involve City investment and funding in infrastructure to ensure that permanently affordable housing is built on those blocks. Any development

agreement for such projects must include community benefits, with the community as a participant or third-party beneficiary, so that the community can monitor the City's and private parties' implementation of such benefits and hold them accountable if the benefits are not produced.

As noted in our June comment letter on the DEIR, we fundamentally support the need for expanded housing in Japantown. However, we want to ensure that the community determines if and how Japantown will be rezoned to accommodate such housing. We also want to ensure that the Planning Department and the Japantown community engage in a discussion of values and vision for Japantown's future before discussing community benefits which would be included in future housing development projects.

Thank you for considering our comments. We look forward to your response and continued dialogue.

Sincerely,

A handwritten signature in black ink, appearing to read "Emily M. Murase". The signature is fluid and cursive, with the first name "Emily" being more prominent.

Emily M. Murase, PhD
Executive Director



NOTICE OF ELECTRONIC TRANSMITTAL

Planning Department Response to Comments on the Draft EIR for the 2022 Housing Element Update

DATE: November 2, 2022
TO: Angela Calvillo, Clerk of the Board of Supervisors
FROM: Elizabeth White, EIR Coordinator, 628.652.7557
or CPC.HousingElementUpdate EIR@sfgov.org
RE: Response to Comments on the Draft EIR for the 2022 Housing Element Update

In compliance with San Francisco's Administrative Code Section 8.12.5 "Electronic Distribution of Multi-Page Documents," the Planning Department is submitting a link to the multi-page responses to comments on a Draft EIR document in digital format to the Clerk of the Board for distribution to the members of the board of supervisors. The Planning Commission will consider certification of the EIR for the 2022 Housing Element Update at its meeting on November 17, 2022.

In addition, informational hearing on the draft 2022 Housing Element Update at the Planning Commission is scheduled for November 10, 2022 with an initiation hearing anticipated on November 17, 2022.

The Board of Supervisor's Committee of the Whole hearing pertaining to the draft Housing Element 2022 Update is scheduled for November 15, 2022 at 3:00 p.m. If adopted by the Planning Commission, the 2022 Housing Element Update would be before the Board for consideration of adoption in 2023.

For questions regarding the environmental review for this project, please contact Elizabeth White at the above contact information.

Link: [Responses to Comments on 2022 Housing Element Update EIR](#)



DRAFT EIR

RESPONSES TO COMMENTS ON THE EIR

RTIC

San Francisco Housing Element 2022 Update

San Francisco Planning
Case No. **2019-016230ENV**
State Clearinghouse No. 2021060358

<i>Draft EIR Publication Date:</i>	April 20, 2022
<i>Draft EIR Public Hearing Date:</i>	June 9, 2022
<i>Draft EIR Public Comment Period:</i>	April 20, 2022–July 12, 2022
<i>Final EIR Certification Hearing Date:</i>	November 17, 2022



San Francisco
Planning

This Page Intentionally Left Blank



MEMORANDUM

Date: November 2, 2022
Case No.: **2019-016230ENV**
Project Title: **San Francisco Housing Element 2022 Update**
To: Members of the Planning Commission and Interested Parties
From: Lisa Gibson, Environmental Review Officer
Re: Attached Responses to Comments on Draft Environmental Impact Report for the San Francisco Housing Element 2022 Update (Planning Department Case No. 2019-016230ENV)

Attached for your review, please find a copy of the Responses to Comments document for the Housing Element 2022 Update draft environmental impact report (EIR). The Responses to Comments document, along with the draft EIR, will be before the planning commission for final EIR certification on November 17, 2022. Please note that the public review period for the draft EIR ended on July 12, 2022. Comments received at the final EIR certification hearing will not be responded to in writing. The agenda for the November 17, 2022, planning commission hearing showing the start time and order of items at the hearing will be available at <https://sfplanning.org/hearings-cpc-grid> by close of business on Thursday, November 10, 2022.

The purpose of the November 17, 2022 planning commission hearing is for the commission to certify if the final EIR is adequate, accurate and objective, reflecting the independent judgment and analysis of the commission.

The planning commission does not conduct a hearing to receive comments on the Responses to Comments document, and no such hearing is required by the California Environmental Quality Act (CEQA). Interested parties, however, may write to the commission at commissions.secretary@sfgov.org (preferred) or 49 South Van Ness Avenue, Suite 1400, San Francisco, CA 94103 to express an opinion on the Responses to Comments document or the commission's decision to certify the final EIR.

This Responses to Comments document together with the draft EIR constitutes the final EIR. The draft EIR may be downloaded from <https://tinyurl.com/SFHE2022> (also accessible at <https://sfplanning.org/environmental-review-documents>). If you have any questions concerning the Responses to Comments document or the environmental review process, please contact Elizabeth White, EIR coordinator, at 628.652.7557 or CPC.HousingElementUpdateEIR@sfgov.org.

Thank you for your interest in this project and your consideration of this matter.

Please be advised that due to the COVID-19 emergency, the planning commission may conduct this hearing remotely using videoconferencing technology or in-person at City Hall. Additional information may be found on the department's website at sfplanning.org.

This Page Intentionally Left Blank

DRAFT EIR

RESPONSES TO COMMENTS ON THE EIR

RTC

San Francisco Housing Element 2022 Update

San Francisco Planning
Case No. **2019-016230ENV**
State Clearinghouse No. 2021060358

<i>Draft EIR Publication Date:</i>	April 20, 2022
<i>Draft EIR Public Hearing Date:</i>	June 9, 2022
<i>Draft EIR Public Comment Period:</i>	April 20, 2022–July 12, 2022
<i>Final EIR Certification Hearing Date:</i>	November 17, 2022



San Francisco
Planning

This Page Intentionally Left Blank

TABLE OF CONTENTS

<u>Chapter</u>	<u>Page</u>
1. Introduction	1-1
A. Purpose of the Responses to Comments Document	1-1
B. Environmental Review Process	1-2
C. Document Organization	1-4
2. Revisions and Clarifications to the Project Description	2-1
A. Project Description Revisions	2-1
B. Environmental Effects of Revisions to the Project	2-14
3. List of Commenters on the Draft EIR	3-1
4. Comments and Responses	4-1
A. Organization of Comments and Responses	4-1
B. Project Description	4-2
Comment PD-1: Assumptions	4-2
Comment PD-2: Environmental Baseline	4-18
Comment PD-3: Reuse of Commercial Buildings as Residential	4-28
C. Plans and Policies	4-32
Comment PP-1: San Francisco Plans and Policies	4-32
D. Effects Found Not to Be Significant	4-34
Comment ENS-1: Land Use and Planning	4-34
Comment ENS-2: Aesthetics	4-36
Comment ENS-3: Population and Housing	4-38
Comment ENS-4: Greenhouse Gas Emissions	4-44
Comment ENS-5: Recreation	4-47
Comment ENS-6: Public Services	4-50
Comment ENS-7: Geology and Soils	4-52
Comment ENS-8: Hydrology and Water Quality	4-54
Comment ENS-9: Hazardous Materials	4-56
E. Cultural Resources	4-57
Comment CR-1: Built-Environment Historic Resources	4-57
F. Transportation and Circulation	4-65
Comment TR-1: Vehicle Miles Traveled	4-65
Comment TR-2: Safety	4-66
Comment TR-3: Parking	4-66

G.	Wind	4-68
	Comment WI-1: Approach to Analysis	4-68
H.	Shadow	4-70
	Comment SH-1: Approach to Analysis.....	4-70
	Comment SH-2: Open Space	4-73
I.	Utilities and Service Systems.....	4-73
	Comment UT-1: Water Supply.....	4-74
	Comment UT-2: Wastewater	4-84
	Comment UT-3: Emergency Firefighting Water System.....	4-86
J.	Alternatives	4-90
	Comment ALT-1: Range of Alternatives	4-90
	Comment ALT-2: Preservation Alternative	4-114
	Comment ALT-3: Project Objectives.....	4-117
	Comment ALT-4: Environmentally Superior Alternative	4-118
	Comment ALT-5: No Project Alternative.....	4-120
K.	General (CEQA).....	4-124
	Comment GC (CEQA)-1: EIR, General	4-124
	Comment GC (CEQA)-2: CEQA Outreach Process.....	4-132
	Comment GC (CEQA)-3: Environmental Review for Future Actions Consistent with the Housing Element 2022 Update.....	4-137
L.	General (Non-CEQA).....	4-139
	Comment GC (NON-CEQA)-1: Not a Comment on the Draft EIR.....	4-139
	Comment GC (NON-CEQA)-2: Project Merits.....	4-143
	Comment GC (NON-CEQA)-3: Community Outreach Process for the Housing Element 2022 Update	4-163
	Comment GC (NON-CEQA)-4: Implementation Process	4-167
M.	Comments Received after Close of Comment Period	4-170
5.	EIR Revisions.....	5-1
A.	Revisions Associated with Responses to Comments	5-1
B.	Staff-Initiated Revisions to Draft EIR Cover and Title Pages	5-5
C.	Staff-Initiated Revisions to Draft EIR Table of Contents	5-6
D.	Staff-Initiated Revisions to Draft EIR Summary Chapter	5-7
E.	Staff-Initiated Revisions to Introduction (Draft EIR Chapter 1)	5-9
F.	Staff-Initiated Revisions to Project Description Chapter (Draft EIR Chapter 2)	5-11
G.	Staff-Initiated Revisions to Plans and Policies Chapter (Draft EIR Chapter 3)	5-21
H.	Staff-Initiated Revisions to Environmental Setting and Impacts Chapter (Draft EIR Chapter 4).....	5-23
I.	Staff-Initiated Revisions to Effects Found Not to Be Significant Section (Draft EIR Section 4.1)	5-24
J.	Staff-Initiated Revisions to Cultural Resources Section (Draft EIR Section 4.2).....	5-27
K.	Staff-Initiated Revisions to Transportation and Circulation Section (Draft EIR Section 4.4)	5-33

L.	Staff-Initiated Revisions to Noise and Vibration Section (Draft EIR Section 4.5).....	5-34
M.	Staff-Initiated Revisions to Air Quality Section (Draft EIR Section 4.6).....	5-35
N.	Staff-Initiated Revisions to Wind Section (Draft EIR Section 4.7).....	5-44
O.	Staff-Initiated Revisions to Other CEQA Considerations (Draft EIR Section 5).....	5-44
P.	Staff-Initiated Revisions to Alternatives Chapter (Draft EIR Chapter 6).....	5-45
Q.	Staff-Initiated Revisions to Report Preparers Chapter (Draft EIR Chapter 7).....	5-50
R.	Staff-Initiated Revisions to Draft EIR Appendices.....	5-50

Attachments

Attachment 1:	Draft EIR Public Hearing Transcript
Attachment 2:	Draft EIR Comment Letters and Emails
Attachment 3:	Historic Preservation Commission Public Hearing Transcript
Attachment 4:	Revised Housing Element Update Policies and Implementing Actions (draft 4, October 2022) (EIR Appendix B)
Attachment 5:	Analysis of Impacts of Accelerated Construction of Regional Housing Needs Allocation
Attachment 6:	Revised Housing Element 2022 Update Modeling and Projections (EIR Appendix C)
Attachment 7:	Revised Cultural Resources Supporting Information (EIR Appendix F)
Attachment 8:	Revised Transportation Supporting Information (EIR Appendix G)
Attachment 9:	Revised Air Quality Supporting Information (EIR Appendix I)

Figures

Page

Figure 2-1	Well-Resourced Areas <u>[Revised]</u>	2-4
Figure 2-8	Areas of the City Under Consideration for Possible Housing Sustainability Districts <u>[Revised]</u>	2-13
RTC Figure 4-1	Projected Heights and Density Controls Shown in DEIR.....	4-12
RTC Figure 4-2	Projected Heights and Density Controls under the Proposed Action: Potential Example 1.....	4-13
RTC Figure 4-3	Projected Heights and Density Controls under the Proposed Action: Potential Example 2.....	4-14
Figure 2-1	Well-Resourced Areas <u>[Revised]</u>	4-17
Figure 2-1	Well-Resourced Areas <u>[Revised]</u>	5-3
Figure 2-8	Areas of the City Under Consideration for Possible Housing Sustainability Districts <u>[Revised]</u>	5-20
Figure 4.6-7	2035 Proposed Action: Change in Traffic-Related PM _{2.5} Contributions Compared to 2035 Midpoint Conditions <u>[Revised]</u>	5-39
Figure 4.6-9	2050 Proposed Action: Change in Traffic-Related PM _{2.5} Contributions Compared to 2050 Environmental Baseline Conditions <u>[Revised]</u>	5-41

Figure 6-3	Projected Difference by Planning District in Housing Growth and Distribution Between 2050 Environmental Baseline and Eastside Alternative <u>[Revised]</u>	5-46
Figure 6-5	Projected Difference by Planning District in Housing Growth and Distribution Between 2050 Environmental Baseline and Preservation Alternative <u>[Revised]</u>	5-47
Figure 6-7	Projected Difference by Planning District in Housing Growth and Distribution Between 2050 Environmental Baseline and Dispersed Growth Alternative <u>[Revised]</u>	5-48
Figure 6-9	Projected Difference by Planning District in Housing Growth and Distribution Between 2050 Environmental Baseline and Plan Bay Area 2050 <u>[Revised]</u>	5-49

Tables

Page

RTC Table 3-1	Commenters on the Draft EIR during the Public Review Period	3-1
RTC Table 4-1	Average Housing Units per Year from Construction and Total Housing Units.....	4-25
RTC Table 4-2	Summary of Water Supply Impacts.....	4-81
RTC Table 4-3	Race and Equity-Related Policies and Strategies	4-103
Table 4.2-1	Completed and Planned Historic Context Statements Informing the San Francisco Cultural Resources Survey <u>[Revised]</u>	5-29

1. INTRODUCTION

A. Purpose of the Responses to Comments Document

The purpose of this responses to comments (RTC) document is to present public comments on the draft environmental impact report (EIR) for the San Francisco Housing Element 2022 Update (housing element update or proposed action); respond in writing to comments on environmental issues; and revise the EIR as necessary to provide additional clarity. Pursuant to California Environmental Quality Act (CEQA) section 21091(d)(2)(A) and (B), the San Francisco Planning Department (department) has considered the comments received on the draft EIR, evaluated the issues raised, and is providing written responses to each substantive environmental issue raised by the commenters during public review. In accordance with CEQA, this RTC document focuses on clarifying the project description, addressing physical environmental issues associated with the proposed action, and describing text changes to the draft EIR initiated by department staff.

None of the comments received or text changes provide new information that warrants recirculation of the draft EIR. The comments and text changes do not identify new significant impacts or a substantial increase in the severity of previously identified impacts. Furthermore, the comments and text changes do not identify feasible project alternatives or mitigation measures that are considerably different from those that were analyzed in the draft EIR.

The draft EIR and this RTC document constitute the final environmental impact report (final EIR) for the proposed action, in fulfillment of CEQA requirements and consistent with CEQA Guidelines section 15132. The final EIR has been prepared in compliance with CEQA, including the CEQA Guidelines, and San Francisco Administrative Code chapter 31. It is an informational document for use by (1) governmental agencies and the public to aid in the planning and decision-making process by disclosing the physical environmental effects of the proposed action and identifying possible ways of reducing or avoiding the potentially significant impacts and (2) the planning commission and other city entities (e.g., the San Francisco Board of Supervisors), where applicable, prior to their decisions to approve, disapprove, or modify the proposed action. General plan amendments must first be initiated by the planning commission. Prior to considering project approvals, the planning commission would certify the final EIR and, thereafter, consider recommending the general plan amendments to the board of supervisors. The board of supervisors would consider adopting an ordinance amending the general plan to include the housing element update. The board of supervisors may approve or reject but may not modify the housing element update as recommended by the planning commission, pursuant to planning code section 340(d). The housing element must also be certified as compliant with state housing element law by the California Department of Housing and Community Development (HCD).

B. Environmental Review Process

The EIR process provides an opportunity for the public to review and comment on the proposed action's potential environmental effects and further inform the environmental analysis. As a first step in complying with the procedural requirements of CEQA, the department published a notice of preparation (NOP) of an EIR and notice of public scoping meeting.

Notice of Preparation and Public Scoping Meeting

The department, as the lead agency responsible for administering environmental review of projects within the city under CEQA, published the NOP for the proposed action on June 16, 2021 (included as Appendix A in Volume II of the draft EIR). The department sent a notice of availability of the NOP to the State Clearinghouse, responsible agencies, and interested individuals and organizations. The department held a virtual scoping meeting on June 29, 2021. The purpose of the scoping meeting and publication of the NOP was to explain the environmental review process for the proposed action and provide an opportunity to take public comments related to the environmental issues of the housing element update, including input on the scope of the analysis in the EIR. Comments received during the scoping process were considered in preparation of the EIR (see **Table 1-1**, draft EIR p. 1-5, for a summary of the comments received on the NOP).

Draft EIR

The department prepared the draft EIR for the proposed action in accordance with CEQA, the CEQA Guidelines, and San Francisco Administrative Code chapter 31. The draft EIR was published on April 20, 2022, and circulated to local, state, and federal agencies as well as interested organizations and individuals. Originally, the department circulated the draft EIR for a public comment period of 62 days (until June 20, 2022). On June 16, 2022, the department extended the comment period to July 12, 2022 (for a total of 83 days).

The planning department distributed paper copies of the EIR for public review at the following locations:

- (1) San Francisco Planning Department, Planning Information Counter, 49 South Van Ness Avenue, and
- (2) San Francisco Main Library, 100 Larkin Street. Electronic copies of the EIR were also available for review by download on the department's web page: <https://tinyurl.com/SFHE2022> (also accessible at <https://sfplanning.org/environmental-review-documents>).

The planning department also distributed the notice of availability of the draft EIR by email to recipients who provided email addresses, published the notice of availability of the draft EIR in the San Francisco Examiner on April 20, 2022, sent the notice of availability of the draft EIR to the State Clearinghouse, posted the notice of availability of the draft EIR at the San Francisco County Clerk's office, and sent copies of the notice of availability of the draft EIR to public libraries and recreational centers in San Francisco for posting.

The planning commission conducted a public hearing regarding the draft EIR on June 9, 2022, to solicit additional comments from members of the public and receive comments from the planning commission. The public hearing was a hybrid meeting; comments were collected remotely by phone call and in person in

Room 400 at city hall. A court reporter at the public hearing transcribed the verbal comments verbatim and prepared a written transcript (see Attachment 1 of this RTC document).

During the draft EIR public review period, the department received written comments from three public agencies, including the letter from the historic preservation commission, discussed below; seven non-governmental organizations; and 85 individuals (or groups of individuals). Many of the written comments contained similar or duplicate text. Multiple submissions were provided by some of these commenters, and multiple representatives of the same public agency and/or non-governmental organization provided comments. During the draft EIR comment period, the department received requests to extend the comment period beyond June 20, 2022; the department extended the comment period to 5:00 p.m. on July 12, 2022, in response to these comments. After the close of the draft EIR public review period on July 12, 2022, the department received written comments from three individuals. Attachment 2 of this RTC document includes copies of the comments submitted during the draft EIR public review period and the comments received from these three individuals after the close of the public review period.

Because the proposed action could affect historic resources, the San Francisco Historic Preservation Commission (historic preservation commission) held a public hearing on June 1, 2022. A court reporter at the public hearing transcribed the verbal comments verbatim and prepared a written transcript. Subsequent to that public hearing, the historic preservation commission submitted a comment letter to the department. Because the intent of the historic preservation commission hearing was for that commission to formulate comments for consideration by the planning commission, this RTC document includes only the comment letter submitted by the historic preservation commission. The transcript of verbal comments made during the historic preservation commission hearing on June 1, 2022, is included for informational purposes as Attachment 3 of this RTC document.

Responses to Comments Document and Final EIR

This RTC document addresses all substantive written and verbal comments received during the draft EIR public review period for the EIR as well as three emails received after the close of the public review period. Late comments are not required to be included in this RTC document, but the department has chosen to include them. They have been responded to as appropriate in RTC Chapter 4, Comments and Responses. Furthermore, CEQA Guidelines section 15204(a) states that the focus of public review should be “on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated.” In addition, “[w]hen responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR.” CEQA Guidelines section 15088 specifies that the lead agency is required to respond to comments on the major environmental issues raised during the draft EIR public review period. Therefore, this RTC document focuses on the sufficiency and adequacy of the EIR with respect to the significance of the physical environmental impacts of the proposed action that were evaluated in the EIR.

The department distributed this RTC document to the planning commission as well as the general public and any agencies, neighborhood organizations, and persons who commented on the draft EIR on November 2, 2022.

The planning commission will consider the adequacy of the final EIR—consisting of the EIR and the RTC document—with respect to the requirements of CEQA and San Francisco Administrative Code chapter 31 during that planning commission hearing. If the planning commission finds that the final EIR is adequate, accurate, and complete and complies with CEQA requirements, it will certify the final EIR under CEQA.

If the final EIR is certified, the planning commission will then review and consider whether to recommend approval of the housing element update to the board of supervisors. As part of the actions related to its recommendations, the planning commission will adopt CEQA findings related to the housing element update's significant impacts,¹ including adopting or rejecting mitigation measures and alternatives to avoid or reduce significant impacts, and adopt the mitigation monitoring and reporting program (MMRP). Consistent with CEQA Guidelines section 15097, the MMRP is designed to ensure implementation of the mitigation measures identified in the final EIR and adopted by decision makers. In addition, the planning commission must make a statement of overriding considerations for significant and unavoidable impacts that cannot be mitigated to a less-than-significant level (CEQA Guidelines section 15093[b]).

The MMRP includes mitigation measures to be implemented by the city in connection with the proposed action and mitigation measures to be implemented by project sponsors in connection with the approval of future projects that are consistent with the housing element update. Project-specific mitigation measures would be imposed on future projects, as applicable.

C. Document Organization

This RTC document consists of the following chapters and attachments:

- **Chapter 1: Introduction** – This chapter discusses the purpose of the RTC document, the environmental review process for the proposed action, and the organization of the RTC document.
- **Chapter 2: Revisions and Clarifications to the Project Description** – This chapter clarifies and summarizes staff-initiated changes to the description of the proposed action, as described in draft EIR Chapter 2, Project Description. The minor revisions and clarifications consist of new information that updates, supplements, or replaces certain project description information and the associated environmental analysis previously presented in the draft EIR. This chapter explains why these revisions and clarifications to the proposed action would not result in any new environmental impacts that were not already discussed in the draft EIR or a substantial increase in the severity of previously identified significant environmental impacts.
- **Chapter 3: List of Commenters on the Draft EIR** – This chapter provides a list of the agencies, organizations, and individuals who submitted written comments during the draft EIR public review period or verbal comments at the public hearing regarding the draft EIR. The list is organized into the following categories: federal, state, regional, and local agencies; boards and commissions; organizations; and individuals. The list

¹ CEQA sections 21002, 21002.1, and 21081 and CEQA Guidelines sections 15091 and 15092.

identifies whether the persons submitted comments in writing (letter or email) or verbally at the EIR public hearing (transcript), or both.

- **Chapter 4: Comments and Responses** – This chapter presents all substantive comments, excerpted verbatim from written comments and the transcript of the planning commission public hearing, regarding the draft EIR. Attachment 1 of this RTC document includes a written transcript of the planning commission public hearing regarding the draft EIR. Attachment 2 of this RTC document includes copies of the written comments submitted during the draft EIR public review period as well as three emails received after the close of the comment period. The comments are organized by topic and, where appropriate, by subtopic, including the same environmental topics addressed in draft EIR Chapter 4, Environmental Setting and Impacts.

This RTC document codes the comments in the following ways:

- “A-”: Comments from agencies are designated by “A-” and an acronym for the agency’s name.
- “O-”: Comments from non-governmental organizations are designated by “O-” and an acronym for the organization’s name.
- “I-”: Comments from individuals are designated by “I-” and the commenter’s last name.

Within each category, commenters are listed in alphabetical order. In cases where commenters provided verbal comments at the public hearing and submitted written comments, or submitted more than one letter or email, the comment codes end with a sequential number. For example, comment codes A-Diamond and A-Diamond_2 denote multiple written and verbal comments submitted by the same commenter.

Following each comment or group of similar comments on a topic are the department’s responses. The responses generally provide clarification of the draft EIR text. They may also include revisions or additions to the draft EIR. Such changes are shown as indented text, with new text underlined and deleted text shown with ~~striketrough~~.

- **Chapter 5: EIR Revisions** – This chapter includes all changes to the draft EIR text and figures noted in the responses to comments or to clarify, expand, or update the information presented in the draft EIR. The revisions to the draft EIR derive from two sources: 1) comments raised in one or more of the comments received by the department during the draft EIR public review period; and 2) staff-initiated changes that correct minor inaccuracies and typographical errors or clarify or update material found in the draft EIR subsequent to its publication and circulation. Revisions associated with responses to comments are presented in Section A and staff-initiated changes are presented in Sections B through R. As discussed in RTC Chapter 5, the changes would not result in significant new information with respect to the proposed action, including the level of significance of any impacts, or any new significant impacts.
- **Attachments** – This RTC document includes the following appendices (called “attachments” to distinguish them from the draft EIR appendices):
 - Attachment 1: Draft EIR Public Hearing Transcript
 - Attachment 2: Draft EIR Comment Letters and Emails

- Attachment 3: Historic Preservation Commission Public Hearing Transcript
- Attachment 4: Revised Housing Element Update Policies and Implementing Actions (draft 4, October 2022) (EIR Appendix B)
- Attachment 5: Analysis of Impacts of Accelerated Construction of Regional Housing Needs Allocation
- Attachment 6: Revised Housing Element 2022 Update Modeling and Projections (EIR Appendix C)
- Attachment 7: Revised Cultural Resources Supporting Information (EIR Appendix F)
- Attachment 8: Revised Transportation Supporting Information (EIR Appendix G)
- Attachment 9: Revised Air Quality Supporting Information (EIR Appendix I)

The written comments in Attachment 2 are organized in the order presented in the list of the agencies, organizations, and individuals who submitted written comments during the draft EIR public comment period.

2. REVISIONS AND CLARIFICATIONS TO THE PROJECT DESCRIPTION

Since publication of the draft EIR on April 20, 2022, planning staff initiated minor revisions and clarifications to the housing element update described in draft EIR Chapter 2, Project Description. This chapter summarizes these minor revisions and clarifications, shows the corresponding updates to the text in the draft EIR (new text is underlined and deleted text is shown in ~~striketrough~~), and describes the environmental impacts of the revisions. EIR text revisions shown in this chapter relate specifically to the changes made in draft EIR Chapter 2, Project Description. Additional EIR text revisions and revisions made in response to the comments received on the draft EIR are presented in RTC Chapter 4, Comments and Responses. All text changes to the draft EIR, including revisions in this chapter, are presented in RTC Chapter 5, EIR Revisions. The revisions clarify, expand, or update the information presented in the draft EIR.

Section 15088.5 of the CEQA Guidelines requires recirculation of a EIR when “significant new information” is added to the EIR after publication of the draft EIR but before certification. The CEQA Guidelines state that information is “significant” if “the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement.” Recirculation is not required if “new information in the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.”

As discussed below, the revisions and clarifications to the housing element update project description do not add significant new information to the draft EIR.

A. Project Description Revisions

Summary of Revisions

A summary of the minor revisions and clarifications made to draft EIR Chapter 2, Project Description, is provided below.

- The text was clarified that the housing element update would shift an increased share of the city’s projected future housing growth within well-resourced areas, but also not limited to well-resourced areas.
- The text was clarified to add “removal of other constraints on the maintenance, improvement, or development of housing” as future actions that could occur after adoption of the housing element update.
- The text was clarified to note that the state’s opportunity area maps are updated annually and, thus, boundaries may slightly fluctuate year to year. The high- and highest-resource area boundaries (i.e., well-resourced areas) shown in **draft EIR Figure 2-1** are based on state data from 2021; the same resource area boundaries are used to inform the proposed action changes shown in other figures in this EIR.

- The text was clarified to describe the CEQA review of future actions consistent with the housing element update.
- A fourth draft of the goals, policies, and actions was released on October 6, 2022; text describing the goals, policies, and actions was revised accordingly. Attachment 4 of this RTC document includes a revised EIR Appendix B, Housing Element Update Policies and Implementing Actions.
- The text was revised to update the number of housing units to be accommodated in the proposed rezoning program as a future action after adoption of the housing element update from 20,000 to 34,000. The updated number is due to analytical refinements of the housing element update since the April 2022 draft EIR publication, as described further below under “Updates to the Text in the Draft EIR.”
- The text was revised to acknowledge the General Plan Land Use Index will be updated to reflect relevant housing element update objectives and policies.
- **Draft EIR Figure 2-8**, Areas of the City Under Consideration for Possible Housing Sustainability Districts, was revised to include approximately one percent more geography than was previously included in the figure.

Updates to the Text and Figures in the Draft EIR

On draft EIR p. 2-1, the last sentence of the second full paragraph has been revised as follows:

The underlying policies and actions would guide development patterns and the allocation of resources to San Francisco neighborhoods. In general, the housing element update would shift an increased share of the San Francisco’s projected future housing growth to transit corridors and low-density residential districts within, but not limited to, well-resourced areas (see Figure 2-1).²

On draft EIR p. 2-1, footnote 2 has been revised as follows:

² *Well-resourced areas* are high- and highest-resource areas, which are neighborhoods identified by the State of California that provide strong economic, health, and educational outcomes for its residents. The state annually updates the opportunity area maps based on updated economic, education, and health data. As a result, the opportunity area map boundaries may slightly fluctuate year to year. The high- and highest-resource area boundaries (i.e., well-resourced areas) shown in Figure 2-1 are based on state data from 2021; the same resource area boundaries are used to inform the proposed action changes shown in other figures in this EIR (e.g., Figure 2-7, p. 2-25, and Figure 2-8, p. 2-28, etc.). More information is available at: <https://www.sfhousingelement.org/well-resourced-neighborhoods>.

On draft EIR p. 2-1, the fourth sentence of third paragraph has been revised as follows:

As such, the proposed action would not result in any direct physical changes to the environment, but would result in reasonably foreseeable changes. Specifically, the San Francisco Planning Department (department) assumes that adoption of the housing element update would lead to future actions, such as planning code amendments to increase height limits along transit corridors and to modify density controls in low-density areas that are primarily located on the west and north sides of the city, designation of housing sustainability

districts, removal of other government constraints on the maintenance, improvement, or development of housing.^{3a} and approval of development projects consistent with the goals, policies, and actions of the housing element update.

On draft EIR p. 2-1, footnote 3a has been added as follows:

^{3a} The housing element update proposes removing governmental constraints to the maintenance, improvement, or development of housing for all income levels. As noted above, one constraint removal could be the establishment of housing sustainability districts. Others could include establishment of streamlined and/or ministerial approval review processes for certain housing applications such as those that may have increased on-site affordability or that are located in well-resourced neighborhoods outside of areas vulnerable to displacement, among other considerations. Please refer to p. 2-6 for further information about constraints to the maintenance, improvement, or development of housing for all income levels.

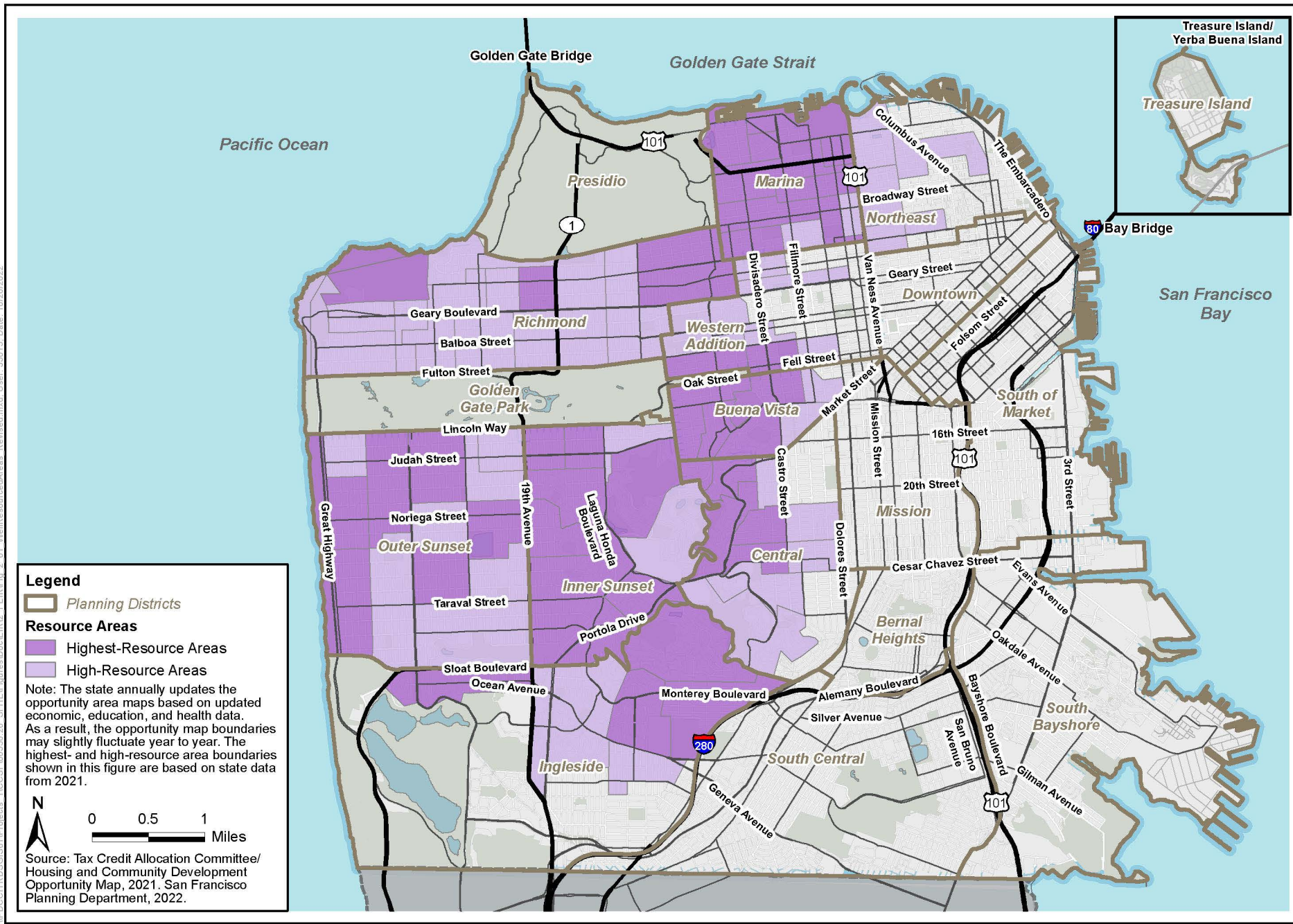
Draft EIR Figure 2-1 on draft EIR p. 2-3 has been revised. The revised figure is provided on the following page. The only changes to the figure are the source year in the legend has been revised to 2021 and the following note has been added to the legend:

Note: The state annually updates the opportunity area maps based on updated economic, education, and health data. As a result, the opportunity map boundaries may slightly fluctuate year to year. The highest- and high-resource area boundaries shown in this figure are based on state data from 2021.

On draft EIR p. 2-8, the first paragraph under “Housing Element Update Process” has been revised as follows:

The department launched the public process for updating the housing element in June 2020, and a first phase of outreach was completed in December 2020. This outreach included 1,631 survey respondents, 118 online platform participants, and approximately 30 community engagement events (listening sessions, presentations, and expert consultations). Based on this community outreach and engagement, the department published a first draft of goals, policies, and actions in April 2021. During the second phase of outreach (April-September 2021), the department collaborated with 21 community organizations to lead over 22 focus groups, participated in 25 community conversations hosted by various community or neighborhood organizations, and hosted six conversations with housing experts. The findings of this outreach process were presented on October 14, 2021 at the planning commission hearing, and the second draft was released on January 14, 2022. A third draft of goals, policies, and actions was released on March 24³⁰, 2022, and presented to the planning commission ~~in early spring 2022~~ on April 7, 2022, and will be submitted to the HCD for its review and feedback. The department released a fourth draft of goals, policies, and actions on October 6, 2022. Any final revisions will be incorporated into a final draft for adoption, which will be presented to the planning commission at a general plan amendment initiation hearing, followed by a hearing for planning commission adoption. If recommended by the planning commission, the board of supervisors would adopt or disapprove at a public hearing. If adopted, the housing element update would be submitted to the HCD for final certification.

\\PDC\TRD\SIG\01\Projects_1\CCSF\00536-20_SFHEFigures\Doc\SFHEIR2_FIRFig_2_01_WellResourcedAreas_Revised.mxd User: 35015 Date: 10/26/2022



On draft EIR p. 2-10, footnote 13a has been added to the last sentence of the last paragraph under “Type of EIR and Future Use” has been revised as follows:

The department will therefore focus the CEQA review of future actions^{13a} consistent with the housing element update on significant adverse impacts on the physical environment, if any, that were not anticipated in the housing element update EIR.

On draft EIR p. 2-10, footnote 13a has been added as follows:

^{13a} “CEQA review of future actions” or similar phrases in the EIR (e.g., further environmental review, independent CEQA review, etc.) means: a) the department will assess if the future action is a “project” as defined by CEQA Guidelines section 15378, and b) if the future action is a project, the department will determine and conduct the appropriate level of CEQA review for the future action (e.g., statutory or categorical exemption, streamlined review under CEQA Guidelines sections 15183 or 15183.3, subsequent EIR under CEQA Guidelines 15162, etc.) and appropriate environmental topic analysis.

On draft EIR p. 2-11, the bullet under “C. Project Objectives” has been updated, consistent with the fourth draft of the San Francisco Housing Element 2022 Update (October 2022), as follows:

- Goal 2: Repair the harms of historic racial and ethnic discrimination against American Indian, Black, and other people of color

On draft EIR p. 2-11, the last paragraph under “C. Project Objectives” has been revised as follows:

The primary objective of the housing element update is to promote the development of more housing through 2050 than is anticipated under existing 2014 housing element policies, while also advancing racial and social equity. To meet the equity objectives, the proposed policies seek to change the geographic distribution of where housing growth would occur in the city. As illustrated in Figure 2-1, p. 2-2, most of the well-resourced areas, as defined by state's 2021 opportunity area maps, are in the northern and western portions of the city. Most of the moderate and low-resource areas are in the eastern and southern portions of the city. The state annually updates the opportunity area maps based on updated economic, education, and health data. As a result, the opportunity area map boundaries may slightly fluctuate year to year. The high- and highest-resource area boundaries (i.e., well-resourced areas) shown in Figure 2-1 are based on state data from 2021; the same resource area boundaries are used to inform the proposed action changes shown in other figures in this EIR (e.g., Figure 2-7, p. 2-25, and Figure 2-8, p. 2-28, etc.). The proposed action recommends equitable distribution of growth throughout the city, which would mean increased development in the most up-to-date well-resourced areas. In well-resourced areas, the proposed action recommends promoting small and midrise multi-family development through height increases along certain transit corridors and through removing density limits or increasing allowable density limits in low-density areas.”

On draft EIR pp. 2-20 through 2-23, under “Proposed Goals, Policies, and Actions,” the text has been revised to reflect the fourth draft of the San Francisco Housing Element 2022 Update, October 2022. The policies have been refined based on community engagement and feedback from the California Department of Housing and Community Development. New policies that are relevant to the assessment of the proposed action’s physical effects on the environment, included as part of the fourth draft that were not in the third draft of housing element update policies (March 2022), are policies 26, 27, 29, 30, and 36. The text has been revised as follows:

Not all of the goals, policies, and actions included in the housing element update will lead to physical effects on the environment. Examples of housing element update policies that are relevant to the assessment of the proposed action’s physical effects on the environment include:

- Policy 2: Preserve affordability of existing subsidized housing, government-owned or cooperative owned housing, or SRO hotel rooms where the affordability requirements are at risk or soon to expire.
- Policy 3: Acquire and rehabilitate privately-owned housing as permanently affordable to better serve residents and areas vulnerable to displacement with unmet affordable housing needs.
- Policy 4: Facilitate the legalization of unauthorized dwelling units while improving their safety and habitability.
- Policy 7: Pursue permanently affordable housing investments that are specific to the geographic, cultural, and support needs of recently arrived or newly independent residents or residents from marginalized groups, including transgender and LGBTQ+ people.
- Policy 8: Expand permanently supportive housing and services for individuals and families experiencing homelessness as a primary part of a comprehensive strategy to eliminate homelessness.
- Policy 11: Establish and sustain homeownership programs and expand affordable housing access for American Indian, Black, Japanese, Filipino, and other communities to redress harm directly caused by past discriminatory government actions including redlining, urban renewal, the Indian Relocation Act, or WWII Japanese incarceration.
- Policy 12: Invest in and expand access to cultural anchors, land, and spaces that are significant to American Indian, Black, Japanese, Filipino, and other communities directly harmed by past discriminatory government actions including redlining, urban renewal, the Indian Relocation Act or WWII Japanese incarceration to redress histories of dispossession, social disruption, and physical displacement.
- Policy 15: Expand permanently affordable housing investments in Priority Equity Geographies²⁰ to better serve American Indian, Black, and other People of color within income ranges underserved, including extremely-, very low-, and moderate-income households.
- Policy 16: Improve access to well-paid jobs and business ownership for American Indian, Black and other communities of color, particularly those who live in Priority Equity Geographies, to build the wealth needed to afford and meet their housing needs.

- Policy 17: Expand investments in Priority Equity Geographies to advance equitable access to resources while ensuring community stability.
- Policy 18: Tailor zoning changes within Priority Equity Geographies and intersecting Cultural Districts to serve the specific needs of American Indian, Black, and other communities of color while implementing programs to stabilize communities and meet community needs.
- Policy 19: Enable low and moderate-income households, particularly American Indian, Black, and other people of color, to live and prosper in Well-resourced Neighborhoods by increasing the number of permanently affordable housing units in those neighborhoods.
- Policy 20: Increase mid-rise and small multi-family housing types by adopting zoning changes or density bonus programs in Well-resourced Neighborhoods and adjacent lower-density areas near transit, including along SFMTA Rapid Network and other transit.
- Policy 21: Prevent the potential displacement and adverse racial and social equity impacts of zoning changes, planning processes, or public and private investments especially for populations and areas vulnerable to displacement.
- Policy 22: Create dedicated and consistent local funding sources and advocate for regional, State, and Federal funding to support building permanently affordable housing for very low-, low-, and moderate-income households that meets the Regional Housing Needs Allocation targets.
- Policy 23: Retain and increase the number of moderate- and middle-income households by increasing their homebuying opportunities and reversing the shortage in housing that is affordable for these households.
- Policy 24: Enable mixed-income development projects to maximize the number of permanently affordable housing constructed, in balance with delivering other permanent community benefits that advance racial and social equity.
- Policy 25: Reduce governmental constraints on development in Well-resourced Neighborhoods to enable small and mid-rise multi-family buildings providing improved housing choice and affordability.
- Policy 26: Streamline and simplify permit processes to provide more equitable access to the application process, improve certainty of outcomes, and ensure meeting State- and local-required timelines, especially for 100% affordable housing and shelter projects.
- Policy 27: Improve coordination, alignment, shared mission, and functionality of post-entitlement permit processes across agencies and jurisdictions to speed housing construction starts after approvals, especially for 100% affordable housing and development agreements.
- Policy 29: Complete community-led processes in Priority Equity Geographies that provide defined community benefits or mitigations for effects of new development consistent with state and federal law in order to reduce burdens on advocates of vulnerable populations and community members and establish more predictable outcomes for housing applications.

- Policy 30: Support the reduction of non-governmental challenges that enable affordable housing and small and mid-rise multi-family buildings as a prominent housing type.
- Policy 31: Facilitate small and mid-rise multi-family buildings that private development can deliver to serve middle-income households without deed restriction, including through adding units in lower density areas or by adding Accessory Dwelling Units (ADUs).
- Policy 32: Promote and facilitate aging in place for seniors and multi-generational living that supports extended families and communal households.
- Policy 33: Prevent the outmigration of families with children and support the needs of families to grow.
- Policy 34: Encourage co-housing to support ways for households to share space, resources, and responsibilities, especially to reinforce supportive relationships within and across communities and generations.
- Policy 35: Require new commercial developments and large employers, hospitals, and educational institutions to help meet housing demand generated by anticipated job growth to maintain an appropriate jobs-housing fit, and address housing needs of students.
- Policy 36: Maximize the use of existing housing stock for residential use by discouraging vacancy, short-term use, and speculative resale.
- Policy 37: Facilitate neighborhoods where proximity to daily needs and high-quality community services and amenities promotes social connections, supports caregivers, reduces the need for private auto travel, and advances healthy activities.
- Policy 38: Ensure transportation investments create equitable access to transit and are planned in parallel with increase in housing capacity to advance well-connected neighborhoods consistent with the City's Connect SF vision, and encourage sustainable trips in new housing.
- Policy 39: Support the repair and rehabilitation of housing to ensure life safety, health, and well-being of residents, especially in Environmental Justice Communities,²⁰ and to support sustainable building practices.
- Policy 40: Enforce and improve planning processes and building regulations to ensure a healthy environment for new housing developments, especially in Environmental Justice Communities.
- Policy 41: Shape urban design policy, standards, and guidelines to enable cultural and identity expression, advance architectural creativity and durability, and foster neighborhood belonging.
- Policy 42: Support cultural uses, activities, and architecture that sustain San Francisco's diverse cultural heritage.
- Policy 2: Preserve affordability of existing subsidized housing, government-owned or cooperative-owned housing, or SRO hotel rooms where the affordability requirements are at risk or soon to expire.

- Policy 3. Reform and support the City's acquisition and rehabilitation program to better serve areas and income ranges underserved by affordable housing options and areas vulnerable to displacement.
- Policy 4. Preserve the affordability of unauthorized dwelling units while improving their safety and habitability.
- Policy 7. Pursue investments in permanently affordable housing that are specific to neighborhoods that serve as entry points to recently arrived residents from certain groups, such as transgender and LGBTQ+ refugees or immigrants, or specific to populations such as transitional aged youth or transgender people.
- Policy 11. Establish and sustain homeownership housing programs designed around a reparations framework for American Indian, Black, Japanese, Filipino, and other communities directly harmed by past discriminatory government actions in the past including redlining, Redevelopment and Urban Renewal, the Indian Relocation Act, or WWII Japanese incarceration, as a means of redressing the harms and with the goal of stabilizing these communities and bringing back those who have been displaced from the city.
- Policy 12. Invest in cultural anchors and expand access to land and spaces that hold cultural importance for American Indian, Black, Japanese, Filipino, and other communities directly harmed by discriminatory government actions in the past including redlining, Redevelopment and Urban Renewal, the Indian Relocation Act or WWII Japanese incarceration as a means of redressing histories of dispossession, social disruption, and physical displacement based on a reparations framework.
- Policy 15. Expand permanently affordable housing investments in Priority Equity Geographies²⁰ to better serve American Indian, Black, and other People of color within income ranges underserved, including extremely-, very low-, and moderate-income households.
- Policy 17. Expand investments in Priority Equity Geographies to advance equitable access to resources while ensuring community stability.
- Policy 18. Tailor zoning changes within Priority Equity Geographies and intersecting Cultural Districts to serve the specific needs of American Indian, Black, and other communities of color.
- Policy 19. Enable low and moderate-income households, particularly American Indian, Black, and other people of color, to live and prosper in Well-resourced Neighborhoods by increasing the number of permanently affordable housing units in those neighborhoods.
- Policy 20. Increase mid-rise and small multi-family housing types in Well-resourced Neighborhoods near transit, including along SFMTA Rapid Network and other transit, and throughout lower-density areas, by adopting zoning changes or density bonus programs.
- Policy 21. Prevent the potential displacement and adverse racial and social equity impacts of zoning changes, planning processes, or public and private investments especially for populations and in areas vulnerable to displacement.

- Policy 22. Create a dedicated and consistent local funding stream and advocate for State and Federal funding to support building permanently affordable housing for very low-, low-, and moderate-income households that meets the Regional Housing Needs Allocation targets.
- Policy 23. Retain and increase the number of moderate- and middle-income households through building permanently affordable workforce housing and reversing the shortage in affordable housing built for these households.
- Policy 24. Support mixed-income development projects to maximize the number of permanently affordable housing constructed, in balance with delivering other permanent community benefits that advance racial and social equity.
- Policy 25. Reduce development constraints such as lengthy City permitting process and high construction costs to increase housing choices and improve affordability.
- Policy 26. Facilitate small and mid-rise multi-family buildings as a prominent housing type that private development can deliver to serve middle-income households without deed restriction, including through expansion or demolition of existing lower density housing, or by adding Accessory Dwelling Units (ADUs).
- Policy 27. Promote and facilitate aging in place for seniors and multi-generational living that supports extended families and communal households.
- Policy 28. Prevent the outmigration of families with children and support the needs of families to grow.
- Policy 29. Encourage co-housing to support ways for households to share space, resources, and responsibilities, especially to reinforce supportive relationships within and across communities and generations.
- Policy 30. Require new commercial developments and large employers, hospitals, and educational institutions to help meet housing demand generated by anticipated job growth to maintain an appropriate jobs-housing fit, and address housing needs of students.
- Policy 32. Facilitate neighborhoods where proximity to daily needs and high-quality community services and amenities promotes social connections, supports caregivers, reduces the need for private auto travel, and advances healthy activities.
- Policy 33. Ensure transportation investments advance equitable access to transit and are planned in parallel with increase in housing capacity to create well-connected neighborhoods consistent with the City's Connect SF vision, and encourage sustainable trips in new housing.
- Policy 34. Support the repair and rehabilitation of housing to ensure life safety, health, and well-being of residents, especially in Environmental Justice Communities,²¹ and to support sustainable building practices.
- Policy 35. Enforce and improve planning processes and building regulations to ensure a healthy environment for new housing developments, especially in Environmental Justice Communities.

- ~~Policy 36. Shape urban design policy, standards, and guidelines to enable cultural and identity expression, advance architectural creativity and durability, and foster neighborhood belonging.~~
- ~~Policy 37. Support cultural uses, activities, and architecture that sustain San Francisco's dynamic and unique cultural heritages.~~

²⁰ ~~More information about priority equity geographies is available at: <https://sfhousingelement.org/priority-equity-geographies>.~~

²¹ ~~More information about environmental justice communities is available at: <https://sfplanning.org/project/environmental-justice-framework-and-general-plan-policies#ej-communities>.~~

²⁰ ~~More information about priority equity geographies is available at: <https://sfhousingelement.org/priority-equity-geographies>.~~

²¹ ~~More information about environmental justice communities is available at: <https://sfplanning.org/project/environmental-justice-framework-and-general-plan-policies#ej-communities>.~~

On draft EIR p. 2-23, the first full paragraph under the bullet list has been revised as follows:

In addition to the goals, policies, and actions to be included as updates to the housing element itself, the housing element update would require conforming amendments to policies in other general plan elements (i.e., elements other than the housing element) including in the Land Use Index. The revisions are minor in nature and are not expected to have any environmental impacts that are separate and distinct from the impacts of the housing element update analyzed in this EIR. To the extent the conforming amendments could lead to physical effects on the environment, those effects would be similar to the effects of the housing element amendments themselves, and are analyzed in this EIR.

On draft EIR p. 2-23, the first paragraph under “Future Actions that Would Implement the Housing Element Update’s Goals, Policies, and Actions” has been revised as follows:

As previously discussed, the department assumes that adoption of the housing element update would lead to future actions, such as planning code amendments to increase height limits along transit corridors and to modify density controls in low-density areas that are primarily located on the west and north sides of the city, designation of housing sustainability districts, removal of other constraints on the maintenance, improvement, or development of housing, and approval of development projects consistent with the goals, policies, and actions of the housing element update described above.

On draft EIR p. 2-24, the first sentence of the first paragraph under “Changes in Land Use Density and Distribution” has been revised as follows:

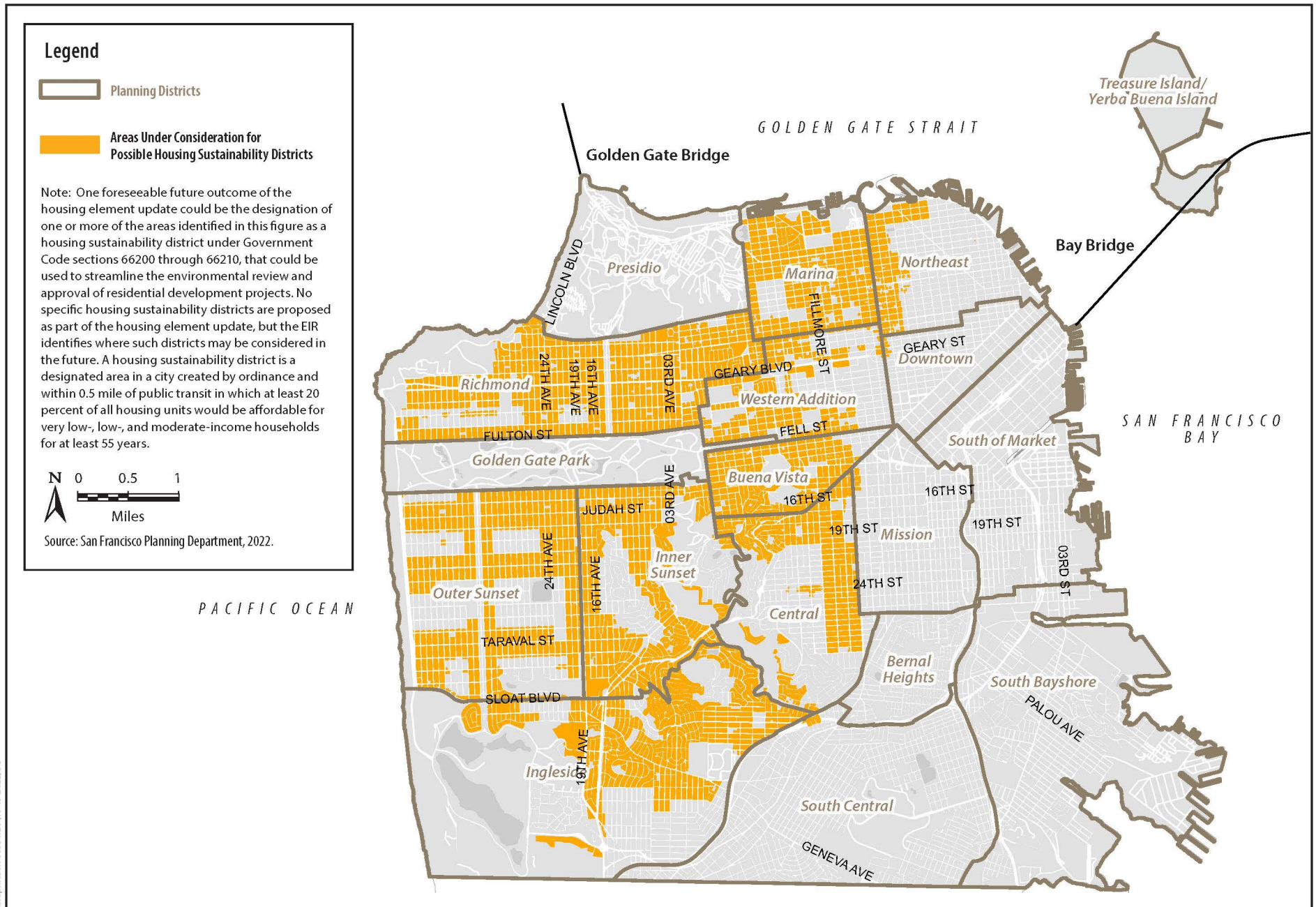
In general, although housing development would occur in all areas of the city where allowed by zoning, the housing element update would endeavor to shift an increased share of the city’s future housing growth to transit corridors and low-density residential districts within but not limited to, well-resourced areas.

On draft EIR pp. 2-26 to 2-27, the text under “Site Inventory” has been revised due to analytical refinements of the housing element update since the April 2022 draft EIR publication based on additional research, analysis, and information. Those refinements included downward adjustments of both the estimated units expected in some pipeline projects (development agreements and large projects) and underutilized and vacant sites, among others. These downward adjustments increased the proposed rezoning program to approximately 34,000

housing units from 20,000 housing units. It is noted that this amount includes a buffer in the housing element inventory of at least 15 percent more capacity than required per the regional housing needs allocation. The text has been revised to the number in the Site Inventory (October 2022, draft 4), 34,000 new housing units, as follows:

In accordance with housing element update Policy 20~~e~~ and in accordance with the sites inventory requirements under California Government Code sections 65583(c)(1)(A) and 65583.2(h), the housing element update will include a proposed rezoning program demonstrating how the city would meet its RHNA and affirmatively furthering fair housing laws. The proposed zoning program will identify specific changes to height, density, review processes, and development controls consistent with the housing element update that would accommodate approximately ~~20,000~~ 34,000 new housing units. This EIR may be used to streamline the environmental review for the adoption of the proposed rezoning program. The approximately ~~20,000~~ 34,000 new housing units to be accommodated in the proposed zoning program are a portion of the approximately 50,000 additional housing units projected by 2050 under the proposed action and evaluated in this EIR. In addition, the department anticipates that this EIR will be used to streamline the environmental review for future zoning and other land use control changes that would implement the objective of the housing element update to further support the production of an average of 5,000 housing units per year through 2050.

Draft EIR Figure 2-8 on draft EIR p. 2-28 has been revised to include approximately one percent more geography within the possible areas under consideration for housing sustainability districts than was previously included in the figure. The revised figure is provided on the following page.



B. Environmental Effects of Revisions to the Project

The minor revisions and clarifications related to the projected future housing growth anticipated within but not limited to the well-resourced areas, the slight fluctuations in the boundaries of the high- and highest-resource areas in the state's opportunity maps, and the increase in the number of new housing units (from 20,000 to 34,000) that would be accommodated in the proposed rezoning program would not result in significant new information to the draft EIR. The general pattern of housing growth distribution within the well-resourced areas upon which the program EIR analysis is based remains the same. In addition, the draft EIR evaluated future growth consistent with the housing element update throughout the entire city, not just in the well-resourced areas. The draft EIR used the opportunity map that was available at the time the analysis was started (2021). Although the clarifications explain that the opportunity maps are updated annually, projected growth would still occur consistent with the housing element update, and growth would not be precluded outside the areas covered by the opportunity maps, no matter the boundary. Further, the overall number of housing units projected to occur in the city by 2050 with adoption of the housing element update (150,000 housing units) compared to the overall number anticipated under the existing 2014 housing element (102,000 housing units) would remain the same as evaluated in the draft EIR. As noted in "Approach to the Analysis," draft EIR pp. 4-4 through 4-6, the environmental impact analysis in the EIR uses projected future conditions (2050) under existing 2014 housing element policies as the baseline against which the environmental impacts of the housing element update are assessed, not existing (i.e., 2020, 2021, or 2022) conditions. The department projects that, under existing housing element policies, approximately 102,000 housing units would be constructed by 2050 (i.e., the 2050 environmental baseline). Under the proposed action, the department projects that approximately 150,000 housing units would be constructed in the city by 2050 compared to 2020 conditions. In other words, the department predicts that approximately 50,000 more housing units would be constructed by 2050 with adoption of the housing element update compared to the 2050 environmental baseline, or more than the 34,000 new housing units that would be accommodated in the proposed rezoning program. See Response PD-2 in RTC Chapter 4, Comments and Responses, for more details. Thus, these minor revisions and clarifications would not result in any new significant impacts that were not already identified in the draft EIR or a substantial increase in the severity of an impact that was identified in the draft EIR. For informational purposes, regardless of the updated numbers, the department will conduct future CEQA review, as needed, of future actions consistent with the housing element update, such as planning code amendments to increase height limits along transit corridors.

The minor revisions and clarifications related to future actions after adoption of the housing element update, as well as the removal of other constraints on the maintenance, improvement, or development of housing, are additional examples of the actions already described in the draft EIR. These minor revisions and clarifications would not alter the use of the land in the city; therefore, it is not anticipated that these actions would result in a direct physical change in the environment or a reasonably foreseeable indirect physical change in the environment. To the extent that these additional future actions would result in direct or reasonably foreseeable indirect physical changes in the environment, the draft EIR adequately evaluates such impacts. The minor revisions to the goals, policies, and actions would not change the overall number of housing units projected in the city by 2050 or the general pattern of distribution of the housing units. In addition, these revisions would not

result in any physical environmental impacts beyond those evaluated in the draft EIR. Most revised policies are refinements of existing text; new policies that are relevant to the assessment of the proposed action's physical effects on the environment, where added, are indicated above. The staff fully replaced relevant housing element update goals, policies, and actions presented in the draft EIR to be consistent with draft 4 (October 2022). This was done for the ease of reading; it is not an indication that the housing element update fully replaced the draft 3 goals, policies, and actions evaluated in the draft EIR.

The revision to **draft EIR Figure 2-8**, Areas of the City under Consideration for Possible Housing Sustainability Districts, includes an additional one percent of the geography from the figure previously shown in the draft EIR. The additional areas added to the figure are consistent with **RTC Figures 4-2 and 4-3** in Response PD-1 in RTC Chapter 4, Comments and Responses, which show other possible distributions of future housing development growth that could occur consistent with the housing element update policies. The total geography shown in this revised **draft EIR Figure 2-8** is approximately 24 percent of the city and does not exceed the threshold set by California Government Code sections 66200 through 66210, which specify that no more than 30 percent of the city can be designated as a housing sustainability district. As described on p. 2-27, "Designation of any future housing sustainability district would require adoption of an ordinance by the board of supervisors amending the planning, and business and tax regulations code." The revision to the area under consideration for a housing sustainability district would not result in any physical environmental impacts not already identified in the draft EIR or a substantial increase in the severity of an impact identified in the draft EIR.

Conclusion

These minor revisions and clarifications would not result in any new significant impact not already identified in the draft EIR or a substantial increase in the severity of an impact identified in the draft EIR, nor do they suggest a feasible alternative or mitigation measure considerably different from those considered in the draft EIR.

Based on the above, the minor revisions and clarifications described under "A. Project Description Revisions" would not result in significant new information pursuant to CEQA, and recirculation is not required pursuant to CEQA Guidelines section 15088.5.

This Page Intentionally Left Blank

3. LIST OF COMMENTERS ON THE DRAFT EIR

This RTC document includes responses to all substantive comments regarding environmental issues received on the draft EIR prior to the close of the draft EIR comment period on July 12, 2022. The comments addressed include written comments submitted by letter or email, as well as verbal comments from the draft EIR public hearing held at the San Francisco Planning Commission on June 9, 2022. This chapter provides a list of the agencies, organizations, and individuals who submitted comments on the draft EIR. **RTC Table 3-1** lists the commenters' names, along with the corresponding commenter codes used in RTC Chapter 4, Comments and Responses, for each set of comments; the comment format (e.g., email); and the comment date.

This RTC document codes the comments in the following ways:

- "A-": Comments from agencies are designated by "A-" and an acronym for the agency's name.
- "O-": Comments from non-governmental organizations are designated by "O-" and an acronym for the organization's name.
- "I-": Comments from individuals are designated by "I-" and the commenter's last name.

Within each category, commenters are listed in alphabetical order. In cases where commenters provided verbal comments at the public hearing and submitted written comments, or submitted more than one letter or email, comment codes end with a sequential number. For example, comment codes A-Diamond and A-Diamond_2 denote multiple written and verbal comments submitted by the same commenter.

Attachment 1 of this RTC document includes a transcript of the planning commission draft EIR public hearing. Attachment 2 of this RTC document includes the comment letters submitted. Attachment 3 of this RTC document includes a written transcript of the historic preservation commission public hearing.

RTC Table 3-1. Commenters on the Draft EIR during the Public Review Period

Commenter Code	Name of Person and Title (if applicable)	Agency/ Organization (if applicable)	Comment Format ¹	Date ²
Federal, State, Regional, and Local Agencies, Boards, and Commissions				
A-Caltrans	Yunsheng Luo, Associate Transportation Planner	California Department of Transportation (Caltrans)	Email	May 16, 2022
A-Diamond	Sue Diamond, Commissioner	San Francisco Planning Commission	Transcript	June 9, 2022
A-Diamond_2	Sue Diamond, Commissioner	San Francisco Planning Commission	Email	July 11, 2022

Commenter Code	Name of Person and Title (if applicable)	Agency/ Organization (if applicable)	Comment Format ¹	Date ²
A-HPC	Not Specified	San Francisco Historic Preservation Commission	Letter	June 7, 2022
A-Imperial	Theresa Imperial, Commissioner	San Francisco Planning Commission	Transcript	June 9, 2022
A-Moore	Kathrin Moore, Commissioner	San Francisco Planning Commission	Transcript	June 9, 2022
A-Tanner	Rachael Tanner, Commissioner	San Francisco Planning Commission	Transcript	June 9, 2022
Organizations				
O-CCLT	Bruce Wolfe	Cares Community Land Trust	Transcript	June 9, 2022
O-CHA	Lori Brooke	Cow Hollow Association	Email with PDF Attachment	July 12, 2022
O-EJA	Francisco Da Costa	Environmental Justice Advocacy	Transcript	June 9, 2022
O-GGVNA	Phile Faroudja	Golden Gate Valley Neighborhood Association	Email	June 30, 2022
O-JPIA	Owen Hart, President	Jordan Park Improvement Association	Email with Word Attachment	July 11, 2022
O-JTF	Emily Murase	Japantown Task Force	Email	June 21, 2022
O-LHIA	Kathy Devincenzi	Laurel Heights Improvement Association	Email with PDF Attachment	July 12, 2022
O-RDR	Don Misumi	Richmond District Rising	Transcript	June 9, 2022
O-REP	Joseph Smooke	Race & Equity in All Planning Coalition	Transcript	June 9, 2022
O-REP_2	Jeantelle Laberinto	Race & Equity in All Planning Coalition	Transcript	June 9, 2022
O-REP_3	Joseph Smooke	Race & Equity in All Planning Coalition	Email	July 12, 2022
O-SOMCAN	Angelica Cabande	South of Market Community Action Network	Transcript	June 9, 2022
O-SPEAK	Eileen Boken	Sunset-Parkside Education and Action Committee	Email	July 11, 2022
O-YCD	Zach Weisenburger	Young Community Developers	Transcript	June 9, 2022

Commenter Code	Name of Person and Title (if applicable)	Agency/ Organization (if applicable)	Comment Format ¹	Date ²
Individuals				
I-Adam	Adam	Individual	Transcript	June 9, 2022
I-Arora	Ann Arora	Individual	Email	July 7, 2022
I-Ayers	Charles Ayers	Individual	Email	June 8, 2022
I-Bargar	Cliff Bargar	Individual	Email	June 8, 2022
I-Bash	Ty Bash	Individual	Email	April 21, 2022
I-Besmer	Jeremy Besmer	Individual	Email	June 8, 2022
I-Boken	Eileen Boken	Individual	Transcript	June 9, 2022
I-Boudreau	Sarah Boudreau	Individual	Email	June 8, 2022
I-Bratun-Glen	Zachary Bratun-Glennon	Individual	Email	July 12, 2022
I-Britamon ³	Jonathan Britamon	Individual	Transcript	June 9, 2022
I-Bunemann ³	Jonathan Bunemann	Individual	Email	June 7, 2022
I-Burns	Linda and Tom Burns	Individual	Email	July 10, 2022
I-Chen	Michael Chen	Individual	Email	June 8, 2022
I-Chintala	George Chintala	Individual	Email	July 12, 2022
I-Chong,L	Linda Chong	Individual	Email	July 11, 2022
I-Chong,RB	Richard and Beverly Chong	Individual	Email	July 10, 2022
I-Conner	Scot Conner	Individual	Email	June 8, 2022
I-Cuddeback	Sam Cuddeback	Individual	Email	June 16, 2022
I-Damerdji	Salim Damerdji	Individual	Email	June 8, 2022
I-Day	Andrew Day	Individual	Email	June 9, 2022
I-DiMento	Joseph DiMento	Individual	Email	June 8, 2022
I-Ed	Ed	Individual	Email	June 10, 2022
I-Eisler,J	Jessica Eisler	Individual	Email	July 8, 2022
I-Eisler,M	Michael Eisler	Individual	Email	July 8, 2022
I-Elmendorf	Christopher Elmendorf	Individual	Email with PDF attachment	May 10, 2022
I-Esfandiari	Bobak Esfandiari	Individual	Email	June 8, 2022
I-Federman	Dan Federman	Individual	Email	June 8, 2022
I-Frankel	Will Frankel	Individual	Email	June 8, 2022

Commenter Code	Name of Person and Title (if applicable)	Agency/ Organization (if applicable)	Comment Format ¹	Date ²
I-Fruchtman	Robert Fruchtman	Individual	Email	June 8, 2022
I-Fruchtman_2	Bob Fruchtman	Individual	Transcript	June 9, 2022
I-Gauss	Miriam Gauss	Individual	Email	June 19, 2022
I-Glick	Linda Glick	Individual	Email	July 11, 2022
I-Golden,A	Alexandra Golden	Individual	Email	July 12, 2022
I-Golden,J	Jonathan Golden	Individual	Email	July 12, 2022
I-Greenfield	Jason Greenfield	Individual	Email	July 12, 2022
I-Hart	Owen Hart	Individual	Email	July 10, 2022
I-Hestor	Sue Hestor	Individual	Transcript	June 9, 2022
I-Hong	Dennis Hong	Individual	Email	June 9, 2022
I-Hong_2	Dennis Hong	Individual	Email	July 11, 2022
I-Howell	Linda and Larry Howell	Individual	Email	July 10, 2022
I-Ivan	David Ivan	Individual	Email	June 9, 2022
I-Jacobi	Mary Jacobi	Individual	Email	July 11, 2022
I-Johnson	Corey Johnson	Individual	Email	June 8, 2022
I-Kanter	David Kanter	Individual	Email	June 8, 2022
I-Kaplan	Ira Kaplan	Individual	Email	June 8, 2022
I-Kattouw	Roan Kattouw	Individual	Email	June 8, 2022
I-Keller	Nathaniel Keller	Individual	Email	June 16, 2022
I-Kind	Elizabeth A. Kind	Individual	Email	July 11, 2022
I-Klenk	Matthew Klenk	Individual	Email	June 8, 2022
I-Kline	Laura Kline	Individual	Email	June 17, 2022
I-Kline_2	Laura Kline	Individual	Email	June 17, 2022
I-Lee	Laurance Lee	Individual	Email	June 8, 2022
I-Madsen	Elena Madsen	Individual	Email	July 8, 2022
I-Mahoney	David Mahoney	Individual	Email	June 18, 2022
I-Marks	Laurie Marks	Individual	Email	June 16, 2022
I-Marks_2	Laurie Marks	Individual	Email	July 8, 2022
I-Martin	Richard Martin	Individual	Email	July 7, 2022
I-Marzo	Steve Marzo	Individual	Email	June 8, 2022

Commenter Code	Name of Person and Title (if applicable)	Agency/ Organization (if applicable)	Comment Format ¹	Date ²
I-Massenburg	Mary Ann Massenburg and Robert D. Purcell	Individual	Email	July 12, 2022
I-Mathews	Linda Mathews	Individual	Email	July 11, 2022
I-Miller	Laurie Miller	Individual	Email	July 12, 2022
I-Mogannam	Mary Mogannam	Individual	Email	July 11, 2022
I-Munoz	Martin Munoz	Individual	Email	June 8, 2022
I-Nakahara	Glynis Nakahara	Individual	Email	June 9, 2022
I-Nakahara_2	Glynis Nakahara	Individual	Transcript	June 9, 2022
I-O'Neill	Shannon and Shawn O'Neill	Individual	Email	July 10, 2022
I-Paul,J	Julie Paul	Individual	Email	June 21, 2022
I-Paul,J_2	Julie Paul	Individual	Email	July 5, 2022
I-Paul,J_3	Julie Paul	Individual	Email	July 9, 2022
I-Paul,M	Mike Paul	Individual	Email	July 5, 2022
I-Paul,M_2	Mike Paul	Individual	Email	July 10, 2022
I-Perla	Jessica Perla	Individual	Email	June 8, 2022
I-Powell	Brandon Powell	Individual	Email	June 8, 2022
I-Pressman	Lauren Pressman Greenfield	Individual	Email	July 10, 2022
I-Randecker	Stacey Randecker	Individual	Email	June 9, 2022
I-Resnansky	Kristin Resnansky	Individual	Email	June 20, 2022
I-Robbins	Sallie Robbins	Individual	Email	July 2, 2022
I-Robbins_2	Sallie Robbins	Individual	Email	July 7, 2022
I-Roberson	Kelly Roberson	Individual	Email	May 7, 2022
I-Roberson_2	Kelly Roberson	Individual	Email	July 8, 2022
I-Roberson_3	Kelly Roberson	Individual	Email	July 11, 2022
I-Rogers	Sarah Rogers	Individual	Email	June 8, 2022
I-Rose	Jeremy Rose	Individual	Email	June 8, 2022
I-Russell	Kenneth Russell	Individual	Email	June 8, 2022
I-Schember	Christopher Schember	Individual	Email	June 22, 2022
I-Schuttish	Georgia Schuttish	Individual	Transcript	June 9, 2022
I-Schuttish_2	Georgia Schuttish	Individual	Email	July 11, 2022

Commenter Code	Name of Person and Title (if applicable)	Agency/ Organization (if applicable)	Comment Format ¹	Date ²
I-Schuttish_3	Georgia Schuttish	Individual	Email	July 13, 2022*
I-Schwartz	Elliot Schwartz	Individual	Email	June 8, 2022
I-Simmons	Scott Simmons	Individual	Email	June 8, 2022
I-Storey	Meg Storey	Individual	Email	June 17, 2022
I-Subin	Zach Subin	Individual	Email	June 8, 2022
I-Thalheimer	Richard Thalheimer	Individual	Email	August 11, 2022*
I-Titus	Alan Titus	Individual	Email	July 11, 2022
I-Truong	Justin Truong	Individual	Email	June 28, 2022
I-Tyburski	Jonathan Tyburski	Individual	Email	June 9, 2022
I-Underwood	Victoria Underwood	Individual	Email with PDF attachment	July 7, 2022
I-Underwood_2	Victoria Underwood	Individual	Email	July 8, 2022
I-Vijayaraghavan	Srinivasan Vijayaraghavan	Individual	Email	June 8, 2022
I-Watson	David Watson	Individual	Email	June 8, 2022
I-Webb	James Webb	Individual	Email	June 8, 2022
I-Weinberg	Barbara Weinberg	Individual	Email	July 10, 2022
I-Welborn	Tess Welborn	Individual	Transcript	June 9, 2022
I-Whitfield	Charles Whitfield	Individual	Email	June 8, 2022
I-Winkler	Calla Winkler	Individual	Email	July 10, 2020
I-Wuerfel	Nancy Wuerfel	Individual	Email	July 26, 2022*
I-Yamagami	Dick & Jan Yamagami	Individual	Email	June 17, 2022
I-Yovanopoulos	Anastasia Yovanopoulos	Individual	Transcript	June 9, 2022

Notes:

¹ Transcript: comments made during draft EIR public hearing at the planning commission.

² Comments submitted after July 12, 2022, the closing date of the public comment period, are highlighted by an asterisk (*). Late comments are not required to be included in this RTC document, but the department has chosen to include them and they have been responded to as appropriate in RTC Chapter 4, Comments and Responses.

³ I-Britamon and I-Bunemann may be the same commenter.

4. COMMENTS AND RESPONSES

This chapter presents all substantive comments, excerpted verbatim from a transcript of the public hearing regarding the draft EIR and written comments, received during the draft EIR public review period as well as three emails received after the close of the public review period. It also provides responses to those comments. The chapter begins with a description of the overall organization of the comments and responses, followed by the comments and responses.

A. Organization of Comments and Responses

The comments are organized by environmental topic area and, where appropriate, by subtopic. The comments are also generally presented in the same order as the environmental topic areas in the draft EIR. Comments related to general California Environmental Quality Act (CEQA) procedural requirements and topics are addressed under “K. General (CEQA)” (e.g., general comments regarding the adequacy of the draft EIR); comments not related to substantive environmental issues or CEQA (e.g., general comments regarding the proposed action’s merits) are addressed under “L. General (NON-CEQA)” near the end of this chapter. Comments received after the close of the draft EIR comment period are addressed under “M. Comments Received after Close of Comment Period.”

The following prefixes represent the abbreviated environmental topic areas used to group responses:

PD	Project Description	SH	Shadow
ENS	Effects Found Not to Be Significant	UT	Utilities and Service Systems
PP	Plans and Policies	ALT	Alternatives
CR	Cultural Resources	GC (CEQA)	CEQA
TR	Transportation and Circulation	GC (NON-CEQA)	General NON-CEQA
WI	Wind		

Comments are coded as follows:

- “A-”: Comments from agencies are designated by “A-” and an acronym for the agency’s name.
- “O-”: Comments from non-governmental organizations are designated by “O-” and an acronym for the organization’s name.
- “I-”: Comments from individuals are designated by “I-” and the commenter’s last name.

This section presents verbatim comments and concludes with the commenter’s name and/or the commenter’s agency or organization affiliation, the comment date, and the comment code. In cases in which a commenter

spoke at the draft EIR public hearing (held by the planning commission on June 9, 2022) and submitted written comments, or submitted more than one comment letter or email, the commenter's last name, or acronym or abbreviation for the organization represented by the commenter, is followed by a sequential number, according to the date of submission.

For the full text of each comment, refer to either Attachments 1 or 2 of this RTC document. Attachment 1 includes a written transcript of the planning commission public hearing regarding the draft EIR, and Attachment 2 includes copies of the written comments submitted on the draft EIR.

The department's responses follow each comment or group of similar comments on a topic. The responses generally provide clarification of the draft EIR text. They may also include revisions or additions to the draft EIR. Such changes are shown as indented text, with new text underlined and deleted text shown with ~~striketrough~~. Corrections and/or clarifications to the draft EIR presented in the responses are repeated in RTC Chapter 5, EIR Revisions.

B. Project Description

The comments and corresponding responses in this section cover topics in draft EIR Chapter 2, Project Description. In addition, this section covers topics under "E. Analysis Assumptions" in draft EIR Chapter 4, Environmental Setting and Impacts." These include topics related to:

- PD-1: Assumptions
- PD-2: Environmental Baseline
- PD-3: Reuse of Commercial Buildings as Residential

Comment PD-1: Assumptions

This response addresses the comments from the commenters listed below. Out of the 28 individual comments, 16 comments are unique and therefore quoted in full below this list. Where the same comment is made by a number of individuals, the text is provided verbatim but not repeated multiple times. The names of the individuals who made the same comment are provided following the comment. Complete letters, emails, and the transcript are provided in full in Attachments 1 and 2 of this RTC document.

- | | | |
|-----------------|----------------|----------------|
| • A-Diamond_2-1 | • I-Chen-3 | • I-Munoz-1 |
| • A-Moore-7 | • I-Damerджи-1 | • I-Powell-1 |
| • O-JPIA-6 | • I-Day-1 | • I-Russell-1 |
| • O-JTF-1 | • I-Federman-1 | • I-Subin-1 |
| • O-JTF-6 | • I-Frankel-1 | • I-Tyburski-1 |
| • O-LHIA-6 | • I-Hong_2-1 | • I-Watson-1 |

- | | | |
|-------------|--------------|---------------|
| • O-REP_3-4 | • I-Hong_2-6 | • I-Winkler-2 |
| • O-SPEAK-3 | • I-Jacobi-2 | • I-Winkler-3 |
| • I-Bash-1 | • I-Kaplan-1 | |
| • I-Chen-1 | • I-Lee-1 | |

“I believe the FEIR must include more than one possible future distribution of the proposed height and density in order to better equip the City to use this EIR to cover other height and density distributions that may ultimately be adopted as part of any future planning code amendments to implement the Housing Element. By including only one possible solution, the DEIR appears to be guiding decisionmakers toward a specific outcome on the height/density distribution for the potential eventual planning code amendments without there having been any public hearings on what that distribution should be. At a minimum, the DEIR should include another distribution with a more equitable allocation of height across all of the west side with everyone on the west side bearing their fair share of the height increase without the imposition of 85’ or 65’ on any residential side street.” (*Sue Diamond, Planning Commission, July 11, 2022, [A-Diamond_2-1]*)

“Those are my comments for the moment. The document is thorough; the document though is very hard to read; the size of the maps and how printed material loses the ability to subtly distinguish between the color shades that are being used. I wish there would be a better way for people to compare alternatives, including understanding exactly where changes within the overall fabric of the city occur.

It is the scale of the maps and the subtlety of tones by which a lot of the detail probably very well thought but gets lost on the reading end by those people who have these documents in front of them.” (*Kathrin Moore, Planning Commission, June 9, 2022, [A-Moore-7]*)

“We also suggest that the Planning Commission be far more proactive in reaching out to the impacted neighborhoods so that they have the opportunity to have their concerns heard. Regardless of where the Commission seeks to increase the housing stock in the city, no residential side streets should have height limitations as great as 85 feet. This proposed change will irreparably damage the urban fabric of our city and the character of our neighborhoods.” (*Owen Hart, Jordan Park Improvement Association, July 11, 2022, [O-JPIA-6]*)

“We are concerned that the proposals it encompasses could exert extreme development pressure and harmful impacts on Japantown.

As you know, Japantown is one of only three remaining Japantowns in the United States and became the City’s first Cultural District in 2013, a designation designed to preserve and stabilize at-risk areas of unique cultural heritage. It is also a community that has been eviscerated by racist government policy, most recently through

City sanctioned urban renewal that reduced Japantown from 40 blocks to its current core of 6 city blocks, displacing hundreds of families and businesses in the process.

We support the need of every neighborhood – including Japantown – to share the responsibility of addressing the very real housing crises. We also support creating more opportunities for the Japanese American community to return to and reside in Japantown after being forcibly removed and displaced, both by the race-based and wholly unwarranted wartime incarceration and the City’s redevelopment programs. However, we think the DEIR contains proposals that unfairly overburden Japantown. JTF would like to note the following of particular concern:

- 1) Dramatic Increases to Height Limits and Lifting of Density Limits – Figure 2-7 (Volume 1, page 185) shows an almost five-fold increase in height limits along Geary Boulevard between Laguna and Fillmore Streets, from the current 50’ limit to 240’. The DEIR also shows a 70% increase to existing height limits one block north of Post Street, between Laguna and Webster Streets, from the current 50’ limit and lifts housing density limits for all of these blocks.

The combination of these upzoning changes could result in more than doubling the housing supply in Japantown by 2050 – an increase of 2,700 more housing units by 2050 – representing a 108% increase above the 2,500 units as of 2021 and allowing 400 more housing units by 2050 than the 2014 Housing Element. These changes could lead to significant impacts on 1) cultural and historic resources, 2) transportation and circulation, 3) shadow, and possibly 4) wind. And yet, there are NO analyses of these potential impacts in the DEIR.

It is important to note that, in the March 2022 SF Housing Element draft Sites Inventory and Rezoning Program Report, potential height limit increases for Japantown were between 55’ and 85’, NOT 240’ and 85’. There was no communication with Japantown on showing these significant changes in the DEIR before its publication.” *(Emily Murase, Japantown Task Force, June 21, 2022, [O-JTF-1])*

“How were the increased building heights and housing units for Japantown determined? What unit size(s) were assumed?” *(Emily Murase, Japantown Task Force, June 21, 2022, [O-JTF-6])*

“To date, much new development has occurred in the South of Market and eastern neighborhoods near the Downtown because developer profit has been larger in those areas than in the western areas. This is where developers have chosen to build. As a developer explained to me, it costs the same amount of money to build a unit of housing in the South of Market as it does to construct a unit of housing on Geary Boulevard, but the South of Market unit would sell or rent for more money. Yet, the DEIR fails to acknowledge this reality and is founded on the false premise that the construction that has occurred in the South of Market and eastern areas resulted from unfairness. Also, since the Planning Department approved all the development in the South of Market and eastern areas, it would appear from the City’s premise that Department approvals must have been unfair.” *(Kathy Devincenzi, Laurel Heights Improvement Association, July 12, 2022, [O-LHIA-6])*

“Recent reports about the extraordinarily high rate of vacant units (more than 40,000 units or 10% of the city’s housing stock) have not been taken into consideration. Production goals should be adjusted to take this information about vacancies into consideration. According to the RHNA guidelines from ABAG, a healthy vacancy rate is considered to be more than 5%, yet San Francisco’s vacancy rate is more than double this benchmark which indicates that the issues with San Francisco’s housing market are due factors other than a lack of supply.” *(Joseph Smooke, Race & Equity in All Planning Coalition, July 12, 2022, [O-REP_3-4])*

“CHALLENGING THE HOUSING ELEMENT DEFINITION OF THE WESTSIDE AS A HIGH RESOURCE AREA

SPEAK strongly challenges this characterization, which could be seen as arbitrary and capricious.

The Westside is not a jobs rich area. The merchant corridors provide only a small fraction of the jobs with most residents working outside the area.

With the exception of Lowell High School and St Ignatius Preparatory, schools on the Westside are no better than the rest of the City and could not be considered outstanding.

The Westside is not a transit rich area. Most transit lines run east/west to get residents to work in other parts of the City and region. Transit frequency is not reliable. For these reasons, the Westside has the highest rate of car ownership in the City.

Until the most current redistricting, the Sunset-Parkside had only Stern Grove as a major park. Golden Gate Park was entirely in District 1. Golden Gate Park access has recently been limited due to a Board of Supervisors decision.

The Westside lacks the infrastructure for significant growth.” *(Eileen Boken, Sunset-Parkside Education and Action Committee, July 11, 2022, [O-SPEAK-3])*

“As I stated during our call, I was surprised and frustrated to see that only one-third of Church Street, along SFMTA’s J- Church line and a main north/south public transit corridor, is currently being considered for rezoning under the Housing Element. When I began to explore the reason for this, I learned that the re-zoning map the Department used was based on the outer boundary of the High/Highest Opportunity Areas as defined by the State Treasurer of California for 2021 (Exhibit B). Later that same year, in December of 2021, this same Opportunity Map was updated to include Church Street in its entirety (and the areas immediately adjacent) as a High/Highest Resource Area (Exhibit A). As such, excluding parts of Church Street from rezoning would be in direct conflict of Policy 20 of the Housing Element report to “Increase mid-rise and small multi-family housing types in Well-resourced Neighborhoods near transit, including along SFMTA Rapid Network. This is particularly troubling since the Housing Element is intended to serve as a road map for housing creation with long-term implications through 2031, while the rezoning decision hinges on a snapshot of time (and are excluding areas that have met its criteria consistently in other years).

A Momentary Snapshot In Time

In the process of preparing this letter, I reviewed the opportunity maps for the five-year period between 2018 and 2022 and identified the following:

(1) Church Street (and the areas immediately adjacent) between 30th Street and Market Street was identified as a High/Highest Resource area in the 2018, 2019 and 2022 Opportunity Map.

(2) A closer examination of the numbers based on which the 2020 and 2021 Opportunity Map was drawn reveals that, during these two years, only the education score dipped slightly below the threshold to be classified as a High/Highest Resource area, while the economic and environmental scores were well above their respective thresholds. Following this two-year period, Church Street in its entirety was again classified as a High/Highest Resource area in the 2022 Opportunity Map

(3) Per the Methodology used for the TCAC/HCD Opportunity Map – “Opportunity mapping also has limitations. For example, maps’ accuracy is dependent on the accuracy of the data behind them. Data may be derived from self-reported surveys of subsets of an area’s population, and sometimes may not be recorded or reliable in some areas”.

I think it is imperative that the Planning Department does not adopt a narrow lens approach by taking a momentary snapshot in time of Church Street with regards to rezoning under the Housing Element. The Opportunity Maps of three out of the last five years place Church Street, in its entirety, as a High/Highest Opportunity area. Furthermore, the 2022 Opportunity Map (most recent data) places Church Street, in its entirety, back within the High/Highest Opportunity area, firming the fact that this area is not losing its place as a High/Highest resource area, but has rather experienced a temporary blip of data inconsistency.

Planning for densification along Transit Corridors

Policy 20 of the Housing Element states:

“Increase mid-rise and small multi-family housing types in Well-resourced Neighborhoods near transit, including along SFMTA Rapid Network and other transit, and throughout lower-density areas, by adopting zoning changes or density bonus programs.

- a. Increase the opportunity for mid-rise multifamily buildings through changes to height limits, removal of density controls, and other zoning changes along SFMTA’s Muni Forward Rapid Network and other transit lines such as California Street, Union Street, Lombard Street, Geary Blvd., Judah Street, Noriega Street, Ocean Ave, Taraval Street, Sloat Blvd., 19th Ave, Park Presidio Blvd., West Portal Ave., Junipero Serra Blvd., **Church Street**, Divisadero Street, 17th and Market/Castro, and Van Ness Ave.*

Within the Housing Element document and re-zoning recommendations, the Planning Department lists Church Street (and the areas immediately adjacent) not only as an area for rezoning, but specifically as an area “allowing midrise multi-family near transit”. The document goes further to define midrise multi-family near transit to mean “increase height between 55’-85’ around select group of routes within one or two blocks, or certain NC corridors”. Yet the map highlights the area for the rezoning along Church Street begins at 21st street and ending at Cesar Chavez. (See exhibit F). This leaves the area north of 21st Street with RM-1 zoning and the area south of Cesar Chavez with RH-2 and NC-1 zoning (Exhibit G).

If we identify transit as a necessity for densification, how could we exclude 2/3 of Church Street (and the areas immediately adjacent) from rezoning?

Conclusion

Church Street (and the areas immediately adjacent) between 30th Street and Market Street was identified as a High/Highest Resource area in the 2018, 2019 and 2022 Opportunity Map. For reasons that this author cannot explain, Church Street (and the areas immediately adjacent) between of 21st Street and Market, and between 30th street and Cesar Chavez, were reclassified as Moderate Resource areas for the year 2020 and 2021, before regaining their status as High/Highest Resource area in 2022. SFMTA's J-Church line, which operates along Church Street between 30th and Market and a main north/south public transit line within this part of town and the only rail line. Policy 20 of the Housing Element recommends increasing mid-rise and small multi-family housing types in Well-Resourced Neighborhoods near transit, including along SFMTA Rapid Network and other transit, and throughout lower-density areas, by adopting zoning changes or density bonus programs. Church Street in its entirety meets all criteria under Policy 20, except for a two-year period (2020 and 2021). Unfortunately, Planning is using these years as the base for the rezoning recommendation. This is particularly troubling since the area south of Cesar Chavez and along the J-Church Line, an area well served by Schools, parks, shopping and dining as well as religious institutions, will remains RH-2 or NC-1. The Housing Element is intended to serve as a road map for housing creation with long-term implications through 2031. We should not allow a blip in data to exclude a neighborhood from an opportunity to build more housing along a transit corridor." (*Ty Bash, April 21, 2022, [I-Bash-1]*)

"This Environmental Impact Report does not fully accommodate San Francisco's RHNA requirements. The DEIR seeks to satisfy Mayor Ed Lee's 2017 goal of producing 5,000 homes per year through 2050. But San Francisco's 2023-2030 RHNA is 82,069 units, which is roughly 10,000 homes per year. The DEIR's sites inventory report attempts to make up for this gap by rezoning for 20,000 units "above baseline," but this figure makes the faulty assumption that all units in the pipeline will actually become housing. To the contrary, Professor David Broockman's comment letter indicates that, based on the historical rate at which pipeline units turn into actual housing, San Francisco would need to rezone for 70,000 units above-baseline in order for the necessary inventory to actually come into existence." (*Michael Chen, June 8, 2022, [I-Chen-1]; the following commenters provided the same comment: I-Damerdjii-1, I-Day-1, I-Federman-1, I-Frankel-1, I-Kaplan-1, I-Lee-1, I-Munoz-1, I-Powell-1, I-Russell-1, I-Subin-1, I-Tyburski-1, and I-Watson-1*)

"This course of events is still avertable. If the Planning Department writes an EIR for the proper number of units, San Francisco would be put in a much stronger position to pass a compliant housing element and avoid the consequences of being found out of compliance." (*Michael Chen, June 8, 2022, [I-Chen-3]; the following commenters provided the same comment: I-Damerdjii-1, I-Day-1, I-Federman-1, I-Frankel-1, I-Kaplan-1, I-Lee-1, I-Munoz-1, I-Powell-1, I-Russell-1, I-Subin-1, I-Tyburski-1, and I-Watson-1*)

“Would the on going Park Merced Housing project be consider as part of this upcoming DEIR-Westside? It looks like this area covers part of District 7 and 11.” (*Dennis Hong, July 11, 2022, [I-Hong_2-1]*)

“Considering one major change in another projects Scope; One Oak went from housing units to apartments was not sure if this DEIR provided for apartment units. I think apartments are more suitable for housing.” *Dennis Hong, July 11, 2022, [I-Hong_2-6]*)

“I support the content of the questions and comments as they are stated below and remain anxious about the effect of your proposals/actions on our lives.

Some initial questions/comments:

1. Why has 60% of the city been totally excluded from this Plan? Some of the areas excluded include the areas closest to major employment centers, areas of the highest transportation infrastructure, areas of the highest concentration of restaurants/shops/services/etc. Areas most attractive to the fastest growing demographic in San Francisco.
 2. In the remaining approximately 40% of the city why has over 50% of that area been excluded from meaningful changes with only minor changes in densification and no changes in heights? Who decided to do this?
 3. Why is the Fulton #5 Bus corridor excluded? This exclusion simply intensifies the impacts elsewhere. Who decided this?
 4. Why is the draconian impact along California St/Geary Blvd/Judah St/Taraval/19th confined to a 1-1/2 block or less distance? Are the people in these new units unable or unwilling to walk more than 200ft? If the Plan used the City’s previous standard of ¼ mile from ANY bus route the impacts on the neighborhoods would be moderate rather than horrific and a reasonable starting point for this entire process.” (*Mary Jacobi, July 11, 2022, [I-Jacobi-2]*)
-

“Questions and Comments:

1. Pg 2-5 Housing Element Background states: ‘Adoption of the Housing Element Update WILL NOT... modify existing controls on land use, height or density...’
2. Pg 2-11 Project Objectives states: ‘In well-resourced areas, the proposed action recommends promoting small and midrise multi-family development through height increases along certain transit corridors and through removing density limits or increasing density limits in low-density areas...’
3. Pg 2-24 Changes in Land Use Density and Distribution states: ‘Modifying allowable density limits and increasing allowable height limits along existing and projected rapid network transit corridors...’ and ‘removing or increasing allowable density limits within 800 ft of these corridors...’

Contradictions anyone???" (*Calla Winkler, July 10, 2022, [I-Winkler-2]*)

"4. The business and residential landscape of the City has changed tremendously with the last several years, even before the pandemic ravaged our borders. High taxes and the sky-rocketing cost of living, not to mention the ever-growing homeless problem, have decimated our City's growth and reputation as a destination spot for tourists. The monoliths Oracle and Hewlett-Packard were only two of the 74 California based company headquarters that have left San Francisco in the first half of 2021 alone. Our city had the largest decline in population of any city in the country during the pandemic – 6.3% packed up and left. That equals 54,813 residents.

5. Question: Did the Planning Department take into account those 54,813 homes that are now vacant? What about the empty buildings that housed the 74 companies that departed? Do we just leave them to disintegrate into the landscape and build anew??" (*Calla Winkler, July 10, 2022, [I-Winkler-3]*)

RESPONSE PD-1

The comments relate to the assumptions for the proposed action used in the draft EIR. Some comments seek clarification regarding the overall modeling and projections used in the draft EIR, the program nature of the EIR, the maps of well-resourced areas in the city, and the analysis of future actions that would implement the proposed action.

This response is organized as follows:

- Program EIR
- Modeling and Projections
- Well-Resourced Areas
- Conclusion

In addition, one comment expresses concern regarding communication about alleged changes to the projected heights and density controls assumed for Japantown. Please refer to Response GC (CEQA)-2 for a discussion of how the department complied with CEQA requirements for outreach related to the housing element update environmental review. Please also note that housing element update policy 20, action a, states that any potential zoning changes in Priority Equity Geographies, such as the Japantown Cultural District, should come through community-led processes (draft 4, October 2022). Finally, one comment expresses general concerns and opinions for aspects of the housing element update, based on its merits; please refer to Response GC (NON-CEQA)-2 for a discussion of the merits of the proposed action.

As explained below, the responses and associated revisions and clarifications in response to comments do not add significant new information to the draft EIR, pursuant to CEQA Guidelines section 15088.5.

Program EIR

CEQA allows for the preparation of multiple types of EIRs. The level of detail in an EIR is driven by the nature of the project, regardless of the type of EIR. An EIR should “be prepared with a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences.”¹ At the same time, the level of detail in an EIR should “correspond” to the “degree of specificity involved in the underlying activity which is described in the EIR.”² Thus, an EIR for a development project will necessarily be more detailed than an EIR prepared for a large-scale plan (e.g., the housing element update), “because the effects of the construction can be predicted with greater accuracy.”³

A programmatic analysis is appropriate for a project that will involve a series of actions that are (1) related geographically, (2) logical parts in a chain of contemplated actions, (3) connected as part of a continuing program, and (4) carried out under the same authorizing statute or regulatory authority, with similar environmental impacts that can be mitigated in similar ways. As discussed on draft EIR pp. 1-3, 2-10, 4-4, and 4-5, this EIR analyzes the proposed action at a programmatic level, in accordance with CEQA Guidelines section 15168. To the extent that any future changes to land use controls could result in significant adverse effects on the physical environment that were not anticipated in the housing element update EIR, those changes would require further environmental review. CEQA Guidelines section 15168 notes that the use of a programmatic analysis “ensure[s] consideration of cumulative impacts that might be slighted in a case-by-case analysis; avoid[s] duplicative reconsideration of basic policy considerations; allow[s] the lead agency to consider broad policy alternatives and program wide mitigation measures at an early time, when the agency has greater flexibility to deal with basic problems or cumulative impacts; and allow[s] a reduction in paperwork.”

The maps included in the draft EIR are not intended to precisely indicate future rezoning programs or future housing development growth. Rather, the maps present one possible distribution of future housing development growth that could occur and informs the environmental impact analysis presented in the program EIR, as indicated in the note provided on most of the figures in the draft EIR (e.g., **draft EIR Figure 2-6** on p. 2-19, **draft EIR Figure 2-7** on p. 2-25, **draft EIR Figure 2-9** on p. 2-31, **draft EIR Figure 2-10** on p. 2-32, **draft EIR Figure 2-11** on p. 2-33). Although the impact analysis in the EIR is based on these representative future conditions, future housing development could occur in any areas of the city where zoning allows.

Draft EIR Figure 2-7, draft EIR p. 2-24, depicts the projected heights and density controls for future development consistent with the housing element update that the department used to inform the analysis in the EIR.

In response to the comments regarding additional possible distribution patterns, two additional examples of possible distribution patterns of future development growth are included for informational purposes here in the RTC document. These examples are provided along with a figure that includes the same possible distribution as **draft EIR Figure 2-7** but with different symbols. These examples are also in the October 2022 draft of the

¹ CEQA Guidelines section 15151.

² CEQA Guidelines section 15146.

³ Ibid.

department's Sites Inventory and Rezoning Program.⁴ RTC Figure 4-1, p. 4-12, shows the information presented in draft EIR Figure 2-7, and RTC Figures 4-2 and 4-3, pp. 4-13 and 4-14, show two additional examples of where future development consistent with the housing element could occur.

Future actions that would implement the housing element update would provide more specificity to these examples, such as future zoning programs (discussed below). Like draft EIR Figure 2-7, these additional example maps do not constitute a legislative proposal; when a future zoning change is proposed, the department will conduct future CEQA review, as needed.

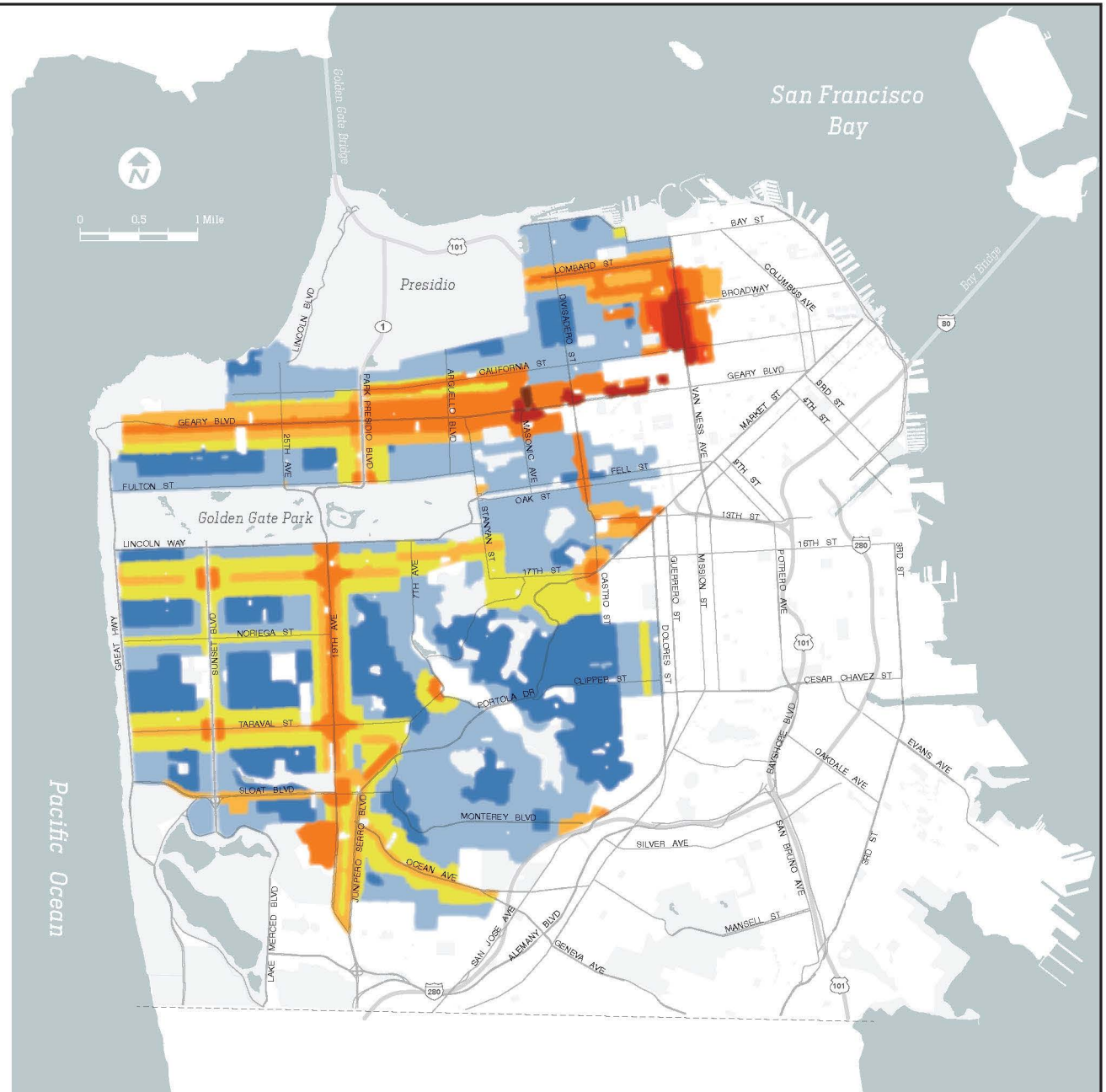
⁴ San Francisco Planning Department, *Draft Sites Inventory and Rezoning Program*, October 2022, <https://www.sfhousingelement.org/draft-sites-inventory-and-rezoning-program>, accessed October 14, 2022.

Housing Element Projected Heights and Density Shown in DEIR

This map represents one possible distribution of future housing development growth that could occur based on modeling conducted by the Planning Department to inform the programmatic environmental impact analysis presented in the EIR. It is an illustrative example of different zoning changes that could implement the policies of the Housing Element 2022 Update.

- Increased density up to four housing units with no height change
- Density decontrol with no height limit change
- 55 feet
- 65 feet
- 85 feet
- 140 feet
- 240 feet
- 300 feet

Areas that are proposed for increased heights would also receive density decontrol, if applicable (e.g., in zoning districts where unit density is limited by lot area).



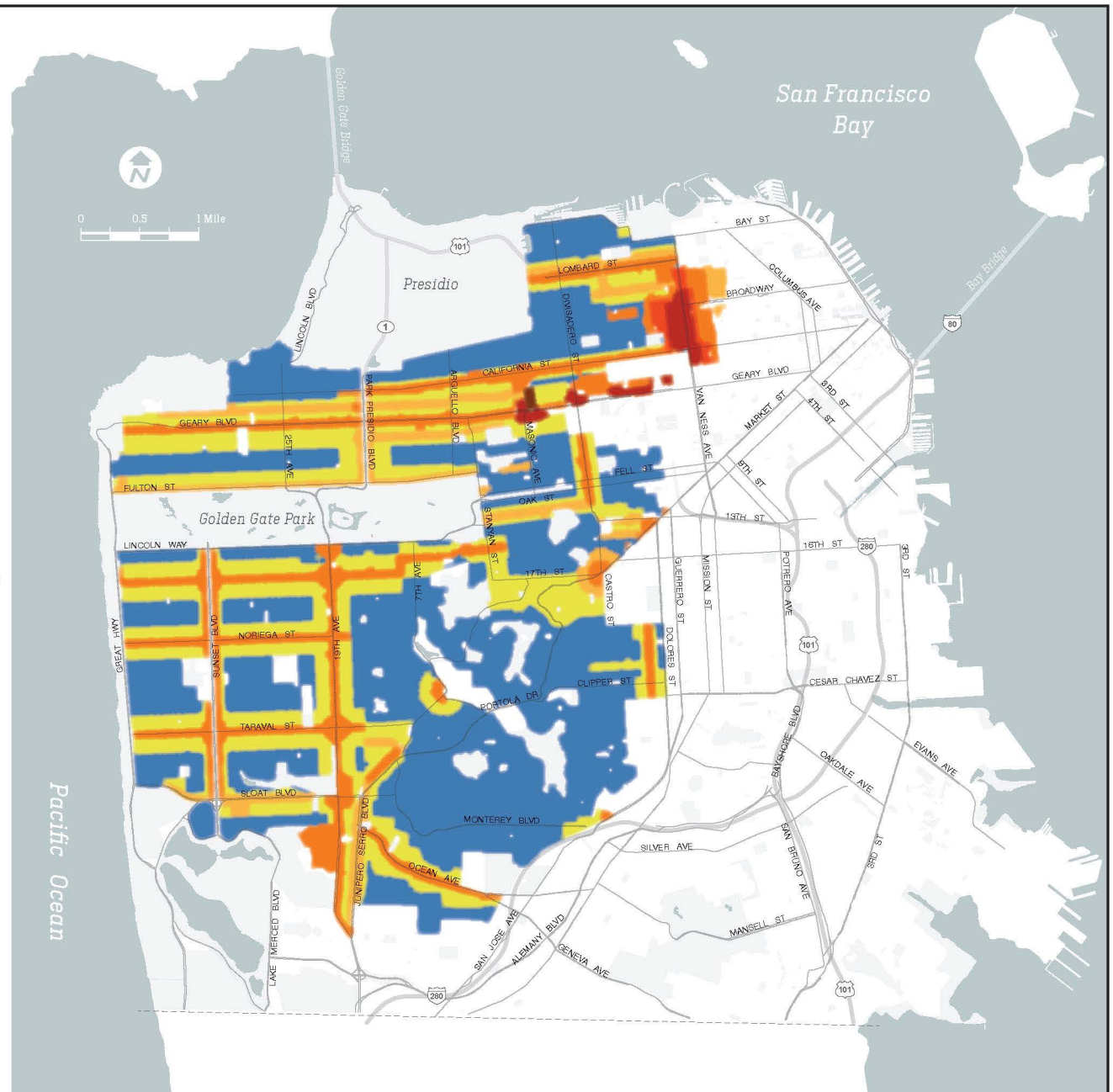
Housing Element Projected Heights and Density Controls Under the Proposed Action: Potential Example 1

This map is an example of another possible distribution of future housing development growth that could occur based on modeling conducted by the Planning Department to inform the programmatic environmental impact analysis presented in the EIR. It is an illustrative example of different zoning changes that could implement the policies of the Housing Element 2022 Update.

- Increased density up to four housing units (six on corner lots)* with no height change
- 55 feet
- 65 feet
- 85 feet
- 140 feet
- 240 feet
- 300 feet

Areas that are proposed for increased heights would also receive density decontrol, if applicable (e.g., in zoning districts where unit density is limited by lot area).

*The draft EIR identified a foreseeable change to increase allowable density limits in low-density areas to four housing units. This example would do the same, but also increase allowable density limits in low-density areas to six housing units on corner lots.



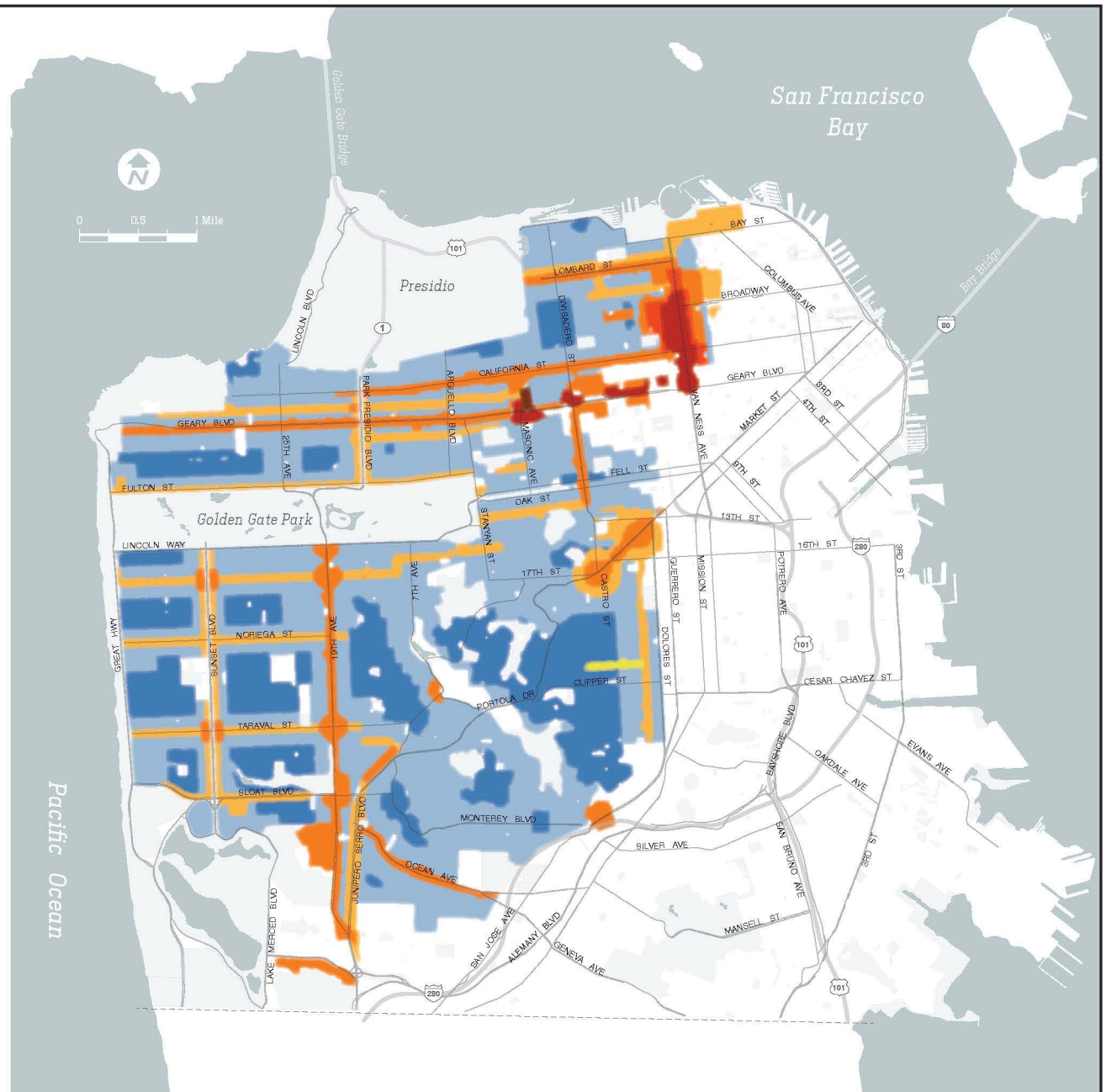
Housing Element Projected Heights and Density Controls Under the Proposed Action: Potential Example 2

This map is an example of another possible distribution of future housing development growth that could occur based on modeling conducted by the Planning Department to inform the programmatic environmental impact analysis presented in the EIR. It is an illustrative example of different zoning changes that could implement the policies of the Housing Element 2022 Update.

- Increased density up to four housing units (six on corner lots)* with no height change
- Density decontrol with no height limit change
- 55 feet
- 65 feet
- 85 feet
- 140 feet
- 240 feet
- 300 feet

Areas that are proposed for increased heights would also receive density decontrol, if applicable (e.g., in zoning districts where unit density is limited by lot area).

*The draft EIR identified a foreseeable change to increase allowable density limits in low-density areas to four housing units. This example would do the same, but also increase allowable density limits in low-density areas to six housing units on corner lots.



Regarding the comment about comparing the figures, the example maps above may allow for such comparison of the possible distribution of future development growth. When viewed electronically in PDF format, as opposed to printed, readers can zoom in on any map to see more details.

To compare the projected distribution of growth under each alternative, refer to the following figures:

- **Draft EIR Figure 6-3**, p. 6-9, and **draft EIR Figure 6-4**, p. 6-10, for maps of housing growth and distribution as well as the projected heights under the Eastside Alternative
- **Draft EIR Figure 6-5**, p. 6-13, and **draft EIR Figure 6-6**, p. 6-14, for maps of housing growth and distribution as well as the projected heights under the Preservation Alternative
- **Draft EIR Figure 6-7**, p. 6-16, and **draft EIR Figure 6-8**, p. 6-17, for maps of housing growth and distribution as well as the projected heights under the Dispersed Growth Alternative
- **Draft EIR Figure 6-9**, p. 6-19, and **draft EIR Figure 6-10**, p. 6-20, for maps of housing growth and distribution as well as the projected heights under Plan Bay Area 2050

Each figure presents the possible distribution of future housing development growth that could occur under the alternatives and Plan Bay Area 2050. In addition, **draft EIR Table 6-2**, pp. 6-22 through 6-41, identifies whether the impacts anticipated under the Eastside, Preservation, and Dispersed Growth alternatives or Plan Bay Area 2050 would be similar to, greater than, or less than the impacts that would occur under the proposed action for all resource topics. As noted in the errata to the draft EIR dated May 19, 2022, the department made minor revisions to correct the text under the inset map on the following figures to read “2050 Environmental Baseline” instead of “2020 Conditions:” **draft EIR Figure 6-3**, **draft EIR Figure 6-5**, **draft EIR Figure 6-7**, and **draft EIR Figure 6-9**; the revised figures are included in RTC Chapter 5, EIR Revisions.

Modeling and Projections

As discussed on draft EIR p. 4-4, the department projected future housing production and distribution under the 2050 environmental baseline, the proposed action, and the alternatives to inform the environmental impact analysis in this program EIR. The Housing Element 2022 Update Modeling and Projections Memorandum is included as Appendix C of the EIR. While the impact analysis in the EIR is based on these projected future conditions, the projected height and housing distribution maps in the EIR are not intended to be precise maps of where future development would occur. As stated on draft EIR p. 4-5 and on **draft EIR Figures 2-6, 2-7, 2-9, 2-10, and 2-11**, the figures present the possible distributions of future housing development growth that could occur and used to inform the environmental analysis in this program EIR. Future housing development could occur in any areas of the city where zoning allows. The depictions are used to identify the type and magnitude of impact anticipated from the increased density and redistribution of housing growth anticipated under the proposed action compared to the 2050 environmental baseline.

For the forecast housing growth and distribution assumed in the draft EIR, please refer to “Housing Element Update Process” on draft EIR pp. 2-8 and 2-9. As discussed there, the housing element update is informed by recently completed housing-related initiatives, including the Housing Affordability Strategies Report. The report analyzes several land use concepts and how they could improve housing affordability over the next 30 years,

particularly for low- and moderate-income households. The report analyzes development feasibility, along with amendments to city policies, and the public investments required to add approximately 5,000 new housing units per year—approximately double recent production trends—which would result in the construction of approximately 150,000 housing units by 2050, with at least one-third of the housing units being permanently affordable to households with low and moderate incomes. The land use concepts in the Housing Affordability Strategies Report inform the development pattern analyzed by this EIR.

Some comments seek clarification about the modeling inputs, including the assumed vacancy rate, unit size, and specific pipeline projects. For purposes of the EIR, the environmental analysis conservatively assumes full occupancy of the 150,000 units projected under the housing element update and did not make assumptions about a specific vacancy rate. The modeling conducted for the housing element update did not assume a specific unit size. Regarding the specific pipeline projects, the housing element update modeling considered the Park Merced and One Oak projects as part of the 2050 environmental baseline. Transportation analysis zone data for all modeled land use patterns are available in Appendix C to the EIR.

Well-Resourced Areas

In general, the housing element update would shift an increased share of the city's projected future housing growth to transit corridors and low-density residential districts within, but not limited to, well-resourced areas. Regarding the comment about state opportunity map boundaries changing, the commenter is correct that the state annually updates the opportunity area maps, based on updated economic, education, and health data. As a result, the opportunity area map boundaries may slightly fluctuate year to year. The high- and highest-resource area boundaries (i.e., well-resourced areas) shown in **draft EIR Figure 2-1** are based on state data from 2021; the same resource boundaries are used to inform the proposed action changes shown in other figures in this EIR. The increase in projected future housing growth (relative to the 2050 environmental baseline) would still be within well-resourced areas, regardless of the boundary changes. This is not to say that housing growth would not occur outside the well-resourced areas over the next 30 years; rather, housing element goals, policies, and actions would focus more of this projected growth in well-resourced areas than would otherwise occur without the update.

Based on this comment, the department made minor revisions to clarify what data the department used (i.e., 2021), explain the state's process for annually updating the opportunity area maps, and clarify that the projected future housing growth is not limited to well-resourced areas. This following text was added to the legend of **draft EIR Figure 2-1**, p. 2-2:

Note: The state annually updates the opportunity area maps based on updated economic, education, and health data. As a result, the opportunity map boundaries may slightly fluctuate year to year. The highest-and high-resource area boundaries shown in this figure are based on state data from 2021.

The revised figure is provided on the following page. It is also noted that the commenter is a correct that there is a housing element update policy (policy 20, action a) that identifies increasing the opportunity for mid-rise multi-family buildings in well-resourced neighborhoods along the streets noted by the commenter, such as Church Street.

\\PDC\TRD\SIG\01\Projects_1\CCSF\00536-20_SFHEFigures\Doc\SFIR2_FIRFig_2_01_WellResourcedAreas_Revised.mxd User: 35015 Date: 10/26/2022

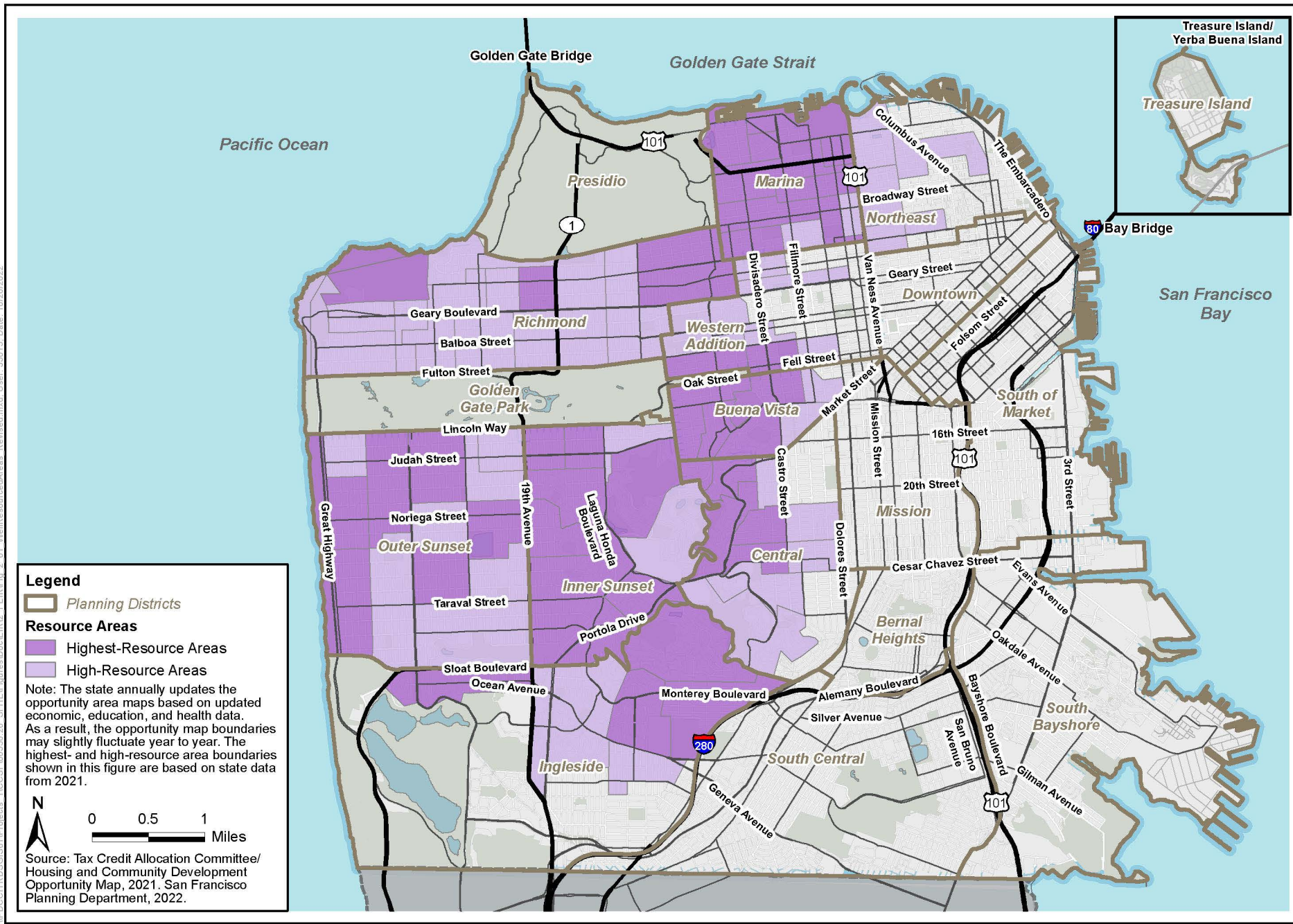


Figure 2-1
Well-Resourced Areas [Revised]

Conclusion

No additional analysis or change to the EIR conclusions regarding this topic is required.

Comment PD-2: Environmental Baseline

This response addresses the comments from the commenters listed below; each comment on this topic is quoted in full below this list. Out of the 19 individual comments, seven comments are unique and therefore quoted in full below. Where the same comment is made by a number of individuals, the text is provided verbatim but not repeated multiple times. The names of the individuals who made the same comment are provided following the comment. Complete letters, emails, and the transcript are provided in full in Attachments 1 and 2 of this RTC document.

- | | | |
|-----------------|-------------------|-----------------|
| • A-Tanner-2 | • I-Federman-1 | • I-Russell-1 |
| • I-Chen-2 | • I-Frankel-1 | • I-Schuttish-2 |
| • I-Damerджи-1 | • I-Fruchtman_2-1 | • I-Subin-1 |
| • I-Day-1 | • I-Kaplan-1 | • I-Tyburski-1 |
| • I-Elmendorf-1 | • I-Lee-1 | • I-Watson-1 |
| • I-Elmendorf-2 | • I-Munoz-1 | |
| • I-Elmendorf-5 | • I-Powell-1 | |

“And then of course this is looking at the 2050 time period. I think for some members of the public who were writing in, I think that was a little bit confusing, just a lot of comments of, you know, we are not planning for the right amount of housing.

And I think maybe there is some work we do to try and communicate what and why we are using the 2050 baseline because I think a lot of e-mails were saying, you know, we are not planning for the RHNA cycle, and

I don’t think that’s exactly what’s happening, but that’s how it’s being read by the public.

So, maybe we can illuminate that a bit for folks so that it’s easier for them to understand kind of why we are using that timeline.” (*Rachael Tanner, Planning Commission, June 9, 2022, [A-Tanner-2]*)

By not fully accommodating San Francisco’s RHNA, the DEIR sets San Francisco up for an enormous headache. Undershooting on the EIR would put an upper limit on the number of units produced by the city’s housing element. This bind, in turn, would give the California HCD ground to reject the city’s pipeline/status-quo capacity analysis. In the best case scenario, SF Planning would need to redo the requisite environmental review for a compliant plan prior to the deadline on a very limited time frame. This would mean long nights and early mornings struggling to meet a difficult deadline, and it would be unlikely to put SF Planning staff in a position to

do their best work. In the worst case scenario, the city would be unable to meet the deadline altogether, thus falling out of compliance, losing affordable housing funds, and being exposed to the builder's remedy." (*Michael Chen, June 8, 2022, [I-Chen-2]*; the following commenters provided the same comment: *I-Damerdji-1, I-Day-1, I-Federman-1, I-Frankel-1, I-Kaplan-1, I-Lee-1, I-Munoz-1, I-Powell-1, I-Russell-1, I-Subin-1, I-Tyburski-1, I-Watson-1*)

"The EIR should report anticipated housing production from 2023-2030 under the preferred and principal alternatives.

The DEIR reasonably elects to use a "future conditions baseline" corresponding to the year 2050 for gauging environmental impacts. However, it should also project housing production through 2030 (the end of the 6th cycle planning period) for the preferred and principal alternatives, so that city officials and members of the public can better understand which alternatives comply with state law. Cf. *Sequoyah Hills Homeowners Assn. v. City of Oakland* (1993) 23 Cal.App.4th 704, 715 ("CEQA does not require extended consideration of project alternatives that are not [legally] 'feasible'")." (*Christopher Elmendorf, May 10, 2022, [I-Elmendorf-1]*)

"At present, as explained in point #2 below, it is doubtful that any alternative in the DEIR is "legally feasible."

2. The EIR should analyze alternatives that would fully accommodate the city's RHNA, not just a previously announced mayoral housing goal.

The preferred and principal alternatives in the DEIR appear to be drawn from a study that was undertaken with the goal of achieving former Mayor Ed Lee's objective of producing 5000 homes/year through 2050.² This goal is repeated fifteen times in the DEIR.

But it was a goal set in 2017, long before the 6th-cycle RHNA numbers were announced and even predating SB 828, the bill which laid the foundation for larger RHNAs. San Francisco's RHNA for the 2023-2030 planning period (82,069 units) translates into roughly 10,000 units/year, or twice the rate of production contemplated by the preferred and principal alternatives in the DEIR.

Can a plan whose stated goal is 5000 units/year be squared with a RHNA calling for twice as much? Only with very dubious assumptions. The draft Sites Inventory and Rezoning Program (March 2022) makes heroic claims about new units from the city's "housing pipeline" and sites identified for acquisition by the Mayor's Office of Housing and Community Development.

On this basis, the sites inventory report concludes that rezoning for merely 20,000 "above baseline" units by 2030—units that would not be built if the regulatory status quo remained in place—will suffice. Yet as the comment letter from UC Berkeley professor David Broockman and San Francisco YIMBY shows, a historically-ground assessment of pipeline capacity suggests that the city should aim to rezone for about 70,000 above-baseline units by 2030. (Such actions would also, of course, yield many, many additional homes between 2030 and 2050, much like the contemplated rezoning for 20,000 above-baseline units by 2030 is expected to yield 50,000 by 2050.)

Ironically, the DEIR's own projections of housing production belie the housing element's assertions. Although the DEIR includes no year-2030 projections, it does forecast that the regulatory status quo would yield only 56,000 housing units by 2035 (4-7). Assuming a flat time trend, that's equivalent to $(8/13) * 56,000 = 34,461$ units by 2030, which implies that the housing element should lay the groundwork for rezoning and constraint removal sufficient to yield at least $82,069 - 34,461 = 47,608$ above-baseline units by 2030. In other words, on the assumptions stated in the DEIR, the rezoning plan should be roughly 2.5 times as capacious as the DEIR's "preferred" alternative." (*Christopher Elmendorf, May 10, 2022, [I-Elmendorf-2]*)

"The EIR should acknowledge the legal effect of a housing element.

The DEIR describes the housing element as a "long-term plan with no direct impacts" (4-6), one which "would not implement specific changes to existing land use controls (e.g., zoning)" (S-2). The DEIR relies on the asserted lack of "direct impacts" to justify the choice of a future- conditions baseline. I support the city's choice of a future-conditions baseline, but I would be cautious about grounding this decision on the asserted lack of direct or near-term impacts.

Although the housing element is not a zoning ordinance, HCD's Sites Inventory Form directs cities to designate how much density will be allowed after rezoning on each inventory site (see Table B, columns M – P). Meanwhile, the Housing Accountability Act generally prohibits cities from denying or "rendering infeasible" an affordable housing project, as defined, if the project "is proposed on a site that is identified as suitable ... for very low, low-, or moderate-income households in the jurisdiction's housing element, and [is] consistent with the density specified in the housing element, even though it is inconsistent with both the jurisdiction's zoning ordinance and general plan land use designation." (Gov't Code 65589.5(d)(5)(A) (emphasis added).)

The upshot is that while San Francisco would still have discretion after adopting its housing element to enact a different rezoning plan (with conforming housing-element amendments), the city's failure to complete a legally adequate rezoning would not leave the zoning status quo in place. Rather, the city would be legally compelling to waive zoning and other land-use restrictions that prevent the development of inventory sites at "post-rezoning" densities contemplated by the housing element.

I don't think this reality prevents the city from grounding environmental review on a future- conditions baseline, but the EIR should forthrightly acknowledge the legal effect of the housing element, lest opponents attack it for not fully disclosing the consequences of the housing element's adoption." (*Christopher Elmendorf, May 10, 2022, [I-Elmendorf-5]*)

"This draft EIR is not a realistic EIR. For instance, San Francisco's goal assigned by the state or by [indiscernible] is to accommodate 82,000 new housing units, not 50,000, and the draft EIR states that the "no alternative action" or there is a no action alternative, is an alternative even though it does not address what would happen if the city were to have an in-compliant housing element with the state. It does not discuss any impacts there.

Additionally, the goal of 150,000 new units by 2050 does not -- is not a pace at which San Francisco can meet RHNA goals for the state's cycle. San Francisco is required to build 10,000 units of -- or to accommodate 10,000 housing units per year, not 5,000 per year.

None of the alternatives are realistic, and the city has not adequately planned for enough housing units to meet RHNA. Thank you." *(Bob Fruchtman, June 9, 2022, [I-Fruchtman_2-1])*

"The 2014 Element which is sort of hanging around as the no -- the no -- the no change one -- alternative. There are a lot of things in there that I don't think were ever fully implemented, certain policies like Policy 2.2, "Discourage the demolition of a sound existing housing unless the demolition results in the net increase in affordable housing."

I mean, that's something we have seen for 10 years, and that relates to what's on page 4.2-19 to 27, the residential development history. It says the "70's downzoning was due to worried affluent residents."

Well, many of those neighborhoods weren't affluent residents then and they still aren't today, and there's no mention of all the changes that have happened in the last 10 years, 20 years, early 21st century as you know. De facto demolitions and mergers, income inequality, displacement, evictions, monster homes, etc." *(Georgia Schuttish, June 9, 2022, [I-Schuttish-2])*

RESPONSE PD-2

The comments relate to use of the 2050 environmental baseline and impact analysis, anticipated housing production between 2023 and 2031 for the proposed action, and compliance with state law.

The response below substantiates the draft EIR's compliance with CEQA and how it interacts with the requirements of housing element law.

The response is organized as follows:

- Environmental Baseline
- Housing Element Law
- EIR Projections vs. Regional Housing Needs Allocation
- Impact Analysis
 - Overall Environmental Impacts
 - Timing of Environmental Impacts
- Conclusion

Please refer to Response ALT-1 for a discussion of the range of alternatives analyzed in the draft EIR.

Environmental Baseline

As discussed under “Environmental Baseline” on draft EIR p. 4-6 in Chapter 4, the analysis in CEQA documents typically identifies impacts by comparing conditions with the proposed project to existing conditions. However, if the housing element update is not adopted, this EIR assumes that housing development would continue to occur under the policies and measures of the existing 2014 housing element, which would be updated to comply with current housing element law; please refer to Response ALT-5 for a discussion of the No Project Alternative. The environmental impact analysis uses projected future conditions (2050) under existing 2014 housing element policies as the baseline against which environmental impacts of the housing element update are assessed, not existing (i.e., 2020, 2021, or 2022) conditions. Comparing and assessing impacts of the housing element update with current/existing conditions would mislead the public and decision makers into believing that (1) there would be no or few changes to existing conditions from continued development under the existing 2014 housing element and (2) that all impacts from future (2050) development are the result of the housing element update rather than accounting for development that could occur under the existing 2014 housing element. Those conclusions would be incorrect and would substantially overestimate the environmental impacts caused by the housing element update. Thus, because the housing element update is a long-term plan, use of an existing, current conditions, or 2020 baseline would be misleading to the public and decision makers. Instead, use of a future 2050 baseline better informs decision makers as to the impacts of adopting the housing element update rather than continuing with the status quo. The department projects that approximately 102,000 housing units would be constructed by 2050 under the existing 2014 housing element (2050 environmental baseline), or an average of approximately 3,400 units per year.

Housing Element Law

The following discussion clarifies state requirements for housing elements—specifically, the housing element update’s relationship to the RHNA. As discussed under “Housing Element Legal Requirements” on draft EIR pp. 2-5 and 2-6 in draft EIR Chapter 2, the housing element update is subject to numerous state requirements. For example, although the jurisdiction must show that suitable and available land for residential development exists to meet the RHNA, it is not required to physically construct the units. The housing element update must be certified as compliant with state housing element law by the California Department of Housing and Community Development (HCD). As identified on draft EIR p. 2-7, “the city’s fair share of the regional housing need for 2023-2031 was calculated as approximately 82,070 units or approximately 10,260 units per year.”

EIR Projections vs. Regional Housing Needs Allocation

To inform the draft EIR analysis, the department used computer modeling to project the likelihood and pattern of development under the environmental baseline and proposed action, including the best projections available when this modeling began in early 2020.⁵ The Association of Bay Area Governments published the Final Regional Housing Needs Allocation (RHNA) Plan: San Francisco Bay Area, 2023–2031 in December 2021, after the

⁵ For more information on the computer modeling that informed the housing element update projections, refer to Appendix C of the draft EIR, Housing Element 2022 Update Modeling and Projection Memorandum.

department commenced environmental analysis (early 2020) and after the department published the notice of preparation of an environmental impact report (NOP) (i.e., June 16, 2021).⁶

As stated on p. 2-1 of the draft EIR, “[t]he housing element update establishes goals, policies, and actions to address the existing and projected housing needs of San Francisco. The goals, policies, and actions are required to plan for the regional housing targets allocated to San Francisco by regional agencies for 2023 to 2031 **and meet future housing demand in San Francisco**” [emphasis added]. Thus, the housing element update, or proposed action, addresses state requirements through 2031 and beyond. The EIR identifies the reasonably foreseeable environmental impacts that could occur as a result of the housing element update, or proposed action, through 2050. Under the proposed action, for purposes of environmental review, the department assumes that approximately 150,000 housing units would be constructed in the city by 2050 compared to 2020 conditions, or an average of approximately 5,000 housing units per year through 2050. This assumption is based on substantial evidence of past housing production in San Francisco as well as policy directives from mayors London Breed and Edwin Lee. Over the last 40 years, the city met the goal of producing 5,000 housing units per year once (in 2016) and came close to meeting this goal in 2019 when the city constructed 4,800 housing units.⁷ As described in the Appendix C to the EIR, Housing Element 2022 Update Modeling and Projections, Mayor Edwin Lee’s executive directive 17-02⁸ (September 2017) set a goal of achieving 5,000 housing units per year as a target for the city. Mayor London Breed’s executive directive 18-02⁹ (August 2018) continued this goal.

As noted in the department’s Draft Governmental and Non-Governmental Constraints Analysis (October 2022) for the housing element update, many factors affect housing production. This includes government constraints, like land use controls in zoning and decision-making process, and non-governmental constraints like construction cost and workforce availability. The constraints analysis states: “To rebalance the production and supply of housing at all income levels, the City will need to stabilize the entire process by addressing harmed communities at a systemic? [sic] level, revising regulations, expanding housing choices and affordability in areas with higher resources, securing substantial and sustained additional public funding, and supporting the workforce who build housing with the ability to return to the city.” (p. 4).

Although the housing element update includes plans and policies that would enable the city to accommodate 82,070 units by 2031 as required by the RHNA and housing element law, the draft EIR reasonably analyzed an aggressive but reasonably foreseeable scenario in which 5,000 housing units per year would be constructed. The draft EIR, which is supported by substantial evidence, provides the public and decision makers with an

⁶ In October 2020, the draft RHNA for San Francisco was 72,080 housing units between 2023 and 2031, or approximately 10,000 units less than the final RHNA. Association of Bay Area Governments’ Executive Board, October 15, 2020, Agenda Item 7. Regional Housing Needs Allocation, Item 07a Attachment B Presentation RHNA.pdf, slide 8, accessed online at: https://abag.ca.gov/sites/default/files/meetings/agendas/4898_A_ABAG_Executive_Board_20-10-15_Generic.pdf.

⁷ City and County of San Francisco, Planning Department, San Francisco Housing Affordability Strategies, March 2020, https://default.sfplanning.org/publications_reports/Housing_Affordability_Strategies_Report.pdf, accessed October 24, 2022.

⁸ Mayor Edwin Lee’s executive directive 17-02 (September 27, 2017) set a goal of achieving 5,000 units per year as a target for the city to achieve. Source: <https://sfmayor.org/article/executive-directive-17-02>, accessed October 24, 2022.

⁹ Mayor London Breed’s executive directive 18-02 (August 30, 2018) continued the goal of achieving 5,000 units per year as a target for the city. Source: https://sfplanning.org/sites/default/files/resources/2018-08/ADU_ExecutiveDirective18_01_FINAL.pdf, accessed October 24, 2022.

assessment of the physical environmental impacts of the housing element update, based on accepted analysis methods using the best information available. As described on draft EIR p. 2-8:

Past housing element policies have fallen short of resulting in the actual construction of a sufficient number of below market rate housing units to fully meet the RHNA. Thus, the housing element update's overall goal is to increase construction of housing units above past production levels. The draft goals, policies, and actions in the housing element update are informed by other recently completed housing-related initiatives, including the Housing Affordability Strategies Report. The report analyzes several land use concepts and how they could improve housing affordability over the next 30 years, particularly for low- and moderate-income households. The Housing Affordability Strategies Report analyzes development feasibility, along with amendments to city policies, and necessary public investments **required to add approximately 5,000 new housing units per year – approximately double current production trends** (emphasis added)– which would result in construction of approximately 150,000 housing units by 2050, and with at least one-third of the housing units as permanently affordable to households with low and moderate incomes.

RTC Table 4-1 provides the average number of housing units per year from new construction as well as the total number of housing units during the timeframe for the RHNA, existing 2014 housing element projections, the housing element update, alternatives to the housing element update, and Plan Bay Area 2050. As shown in RTC Table 4-1 and noted in draft EIR Chapter 2, an average housing production level of more than 10,000 units per year would be a 400 percent increase compared with the city's average net housing production for the past two decades (i.e., 2,545 housing units per year). An average of 10,000 housing units per year would be a 300 percent increase compared with the housing production level projected under the 2050 environmental baseline (i.e., 3,400 housing units per year) and a 200 percent increase compared with the housing production level projected for the housing element update and the alternatives through 2050 (i.e., 5,000 housing units per year).

RTC Table 4-1. Average Housing Units per Year from Construction and Total Housing Units

Scenario	Timeframe	Average Housing Units per Year from New Construction	Total Housing Units during Timeframe
Production (Actual) ^a	2001 to 2020	2,545	50,890
Regional Housing Needs Allocation ^b	2023 to 2031	10,260	82,070 ¹
Existing 2014 Housing Element, aka 2050 Environmental Baseline (Projection), and No Project Alternative (Projection) ^c	2021 to 2050	3,400	102,000
Housing Element Update as well as the Eastside, Preservation, and Dispersed Growth Alternatives (Projection) ^c	2021 to 2050	5,000	150,000
Plan Bay Area 2050 ^d	2021 to 2050	6,253	187,600

Notes:

¹ The draft October 2022 Sites Inventory and Rezoning Program identified that San Francisco could contribute approximately 1,800 units to the RHNA through substantial rehabilitation, conversion, and preservation of affordable housing.

Sources:

- a. Production: San Francisco Planning Department, *2020 San Francisco Housing Inventory*, 2021, Table 2, page 19.
- b. Regional Housing Needs Allocation: Association of Bay Area Governments, Final Regional Housing Needs Allocation (RHNA) Plan: San Francisco Bay Area, 2023–2031, https://abag.ca.gov/sites/default/files/documents/2022-04/Final_RHNA_Methodology_Report_2023-2031_March2022_Update.pdf, accessed September 11, 2022.
- c. Existing 2014 Housing Element, No Project Alternative, Housing Element Update, Eastside Alternative, Preservation Alternative, Dispersed Growth Alternative: San Francisco Planning Department, 2021.
- d. Plan Bay Area 2050: The source of Plan Bay Area 2050 growth projections is the Metropolitan Transportation Commission. The department converted the Metropolitan Transportation Commission’s household data into housing units using a 3 percent vacancy rate for analysis in this EIR.

Comments express that the draft EIR should have studied the impacts of construction of 82,070 housing units (the RHNA) by 2031. The housing element update includes goals, policies, and actions and subsequent implementation programs to make sites available to accommodate housing development for each income level allocated to San Francisco by the RHNA (i.e., 82,070 total housing units). For the purpose of CEQA, the draft EIR analyzes the impacts of housing development that is reasonably foreseeable between 2020 and 2050. This approach is supported by substantial evidence, as described above. It provides the public and decision makers with the most accurate and understandable picture possible using the best information available.

Please refer to Response PD-1 for a discussion of the assumptions used to inform this program EIR.

Impact Analysis

As explained above, the draft EIR, as an informational document, meets the requirements of CEQA. The draft EIR provides the public and decision makers with an assessment of the physical environmental impacts of the housing element update, based on substantial evidence, and the most accurate and understandable picture possible using the best information available. Regardless, for informational purposes, the following demonstrates that the draft EIR adequately addresses the potential environmental impacts from construction of 82,070 housing units by 2031. In addition, Attachment 5 of this RTC document has been added. As explained

below and Attachment 5, such impacts would be substantially the same as impacts from construction of 150,000 units by 2050. Although certain impacts could occur sooner, or could be slightly greater due to the concentration of construction in a shorter time frame, those impacts would not be substantially different than the impacts identified in the draft EIR.

Overall Environmental Impacts

Under the proposed action, based on department projections, the EIR analyzes the programmatic impacts of construction of approximately 150,000 housing units in the city by 2050 compared to 2020 conditions. This number (150,000) includes the city's RHNA numbers (82,070). Construction of the 150,000-housing unit total would be a 182 percent increase over the 82,070 housing units allocated to the city as its RHNA for 2023 to 2031. Thus, the analysis in the draft EIR – which analyzes physical environmental impacts from more housing units over a longer timeframe (150,000 housing units over 30 years) – adequately addresses the overall environmental impacts from fewer units over a shorter timeframe (82,070 units over eight years).

Timing of Environmental Impacts

CEQA requires a lead agency to consider the short-term and long-term effects of the project. As described above, the draft EIR adequately addresses the overall effects from the proposed action at a programmatic level, including the construction of 75,000 housing units by 2035 and the construction of 150,000 housing units by 2050. The following substantiates how the draft EIR also adequately addresses the short-term and long-term effects of the construction of 82,070 housing units between 2023 and 2031.

Operations

As discussed under “2035 Midpoint Analysis” on draft EIR p. 4-7 in Chapter 4, for transportation (transit delay and vehicle miles traveled), air quality, and noise, the EIR also provides a midpoint (2035) analysis of anticipated physical environmental effects. Text has also been provided to clarify that this analysis is included in the draft EIR. On draft EIR p. 4-7, the first paragraph under the “2035 Midpoint Analysis” sub header has been revised as follows:

For transportation (transit delay and vehicle miles traveled), air quality, ~~and noise impacts, and utilities and service systems~~, the EIR provides a midpoint (2035) analysis of anticipated physical environmental effects. The 2035 midpoint analysis is ~~only~~ conducted for ~~these transportation, air quality, and noise~~ topics because there is a potential for impacts to be worse in 2035 compared to 2050 due to planned transportation improvements and increasingly stringent emissions standards that would occur after 2035. The department conducted a 2035 midpoint analysis for some utility and service systems to understand the projected demand and timing for when for new or expanded infrastructure may be necessary due to projected housing growth. The 2035 midpoint conditions analysis provide city decision makers an additional point to inform decision making, such as when and where to prioritize future transportation and another infrastructure facilities and improvements. This midpoint analysis also serves as a point of comparison to show how the potential impacts of the proposed action differ between 2035 and 2050.

For purposes of the EIR, the department projects that the city would add approximately 56,000 new housing units under the existing 2014 housing element by 2035 (i.e., the 2035 midpoint condition or baseline for the 2035 midpoint analysis) compared with approximately 75,000 housing units under the proposed action by 2035, a difference of 19,000 housing units. For the topics that included a 2035 midpoint analyses, the most severe impacts would occur in 2050, including significant and unavoidable impacts in the areas of transportation, noise, air quality, and utilities and service systems (water supply and wastewater).

Construction

As discussed under “Approach to Cumulative Impacts” on draft EIR p. 4-9 and throughout the draft EIR, the projections for the housing element update include all anticipated housing and employment growth in the city through 2050. As stated on draft EIR p. 4-9:

While the project-level impact analysis identifies that impacts that would result from the construction and operation of approximately 50,000 housing units by 2050 (i.e., the difference between growth anticipated under the 2050 environmental baseline and the additional housing growth projected under the proposed action), the cumulative impact analysis in this EIR considers the impacts that would result from the addition of approximately 150,000 housing units and 111,000 jobs in the city through 2050 compared to 2020 conditions. Thus, the cumulative impact analysis identifies the impacts that would result from the housing and job growth that would occur in the city through 2050 **without the proposed action** in combination with the additional growth anticipated with the proposed action. (emphasis added)

As discussed in the draft EIR, the construction-related impact analysis of the housing element update accounts for the impacts of overlapping construction associated with future development consistent with the housing element update and other cumulative projects. The construction-related impact analyses are based on reasonably foreseeable projections that forecast the construction of 5,000 housing units per year in the city. Some years may have more than 5,000 housing units, and some years may have fewer than 5,000. Given a standard construction schedule of approximately two years for individual future housing developments, the city could have approximately 10,000 housing units or more under construction in any given year.

Construction-related impacts are typically localized. In addition, construction analyses typically require more details regarding the location and timing of overlapping construction projects; these details are appropriate for a development project level analysis and generally cannot be known at this time for a programmatic analysis like the housing element update. Based on this, the draft EIR adequately addresses the programmatic impacts associated with the accelerated construction of the RHNA number: 82,070 housing units between 2023 and 2031, or 10,260 housing units per year.

For example, Impact NO-1, starting on draft EIR p. 4.5-31, discusses the potential for construction from multiple future development projects occurring simultaneously or consecutively (e.g., multiple housing projects on the same block). Effects on the temporary noise environment are dependent on the distance between projects as well as the distance between each project and sensitive receptors. If the proposed action would lead to the construction of 10,000 housing units per year instead of 5,000 housing units per year, the proposed action's

impact for construction noise would not double or be substantially more severe than that described in the draft EIR because the impact to any sensitive receptor would be localized and highly dependent on the number of projects under construction in the local, or immediate, area and not dependent on the number of projects under construction in the city overall. Similar approaches are taken for other topics with respect to construction impacts (e.g., transportation, air quality).

In addition, as shown in **RTC Table 4-1**, p. 4-25, the draft EIR also studied Plan Bay Area 2050, which projects approximately 187,600 housing units between 2021 and 2050; this assumes the construction of approximately 6,250 housing units per year, or approximately 1,250 more housing units per year than under the proposed action. Please refer to Response ALT-1 for a discussion of the range of alternatives analyzed in the draft EIR.

Based on the above, from a CEQA perspective, the draft EIR adequately addresses the overall environmental impacts of the housing element update and alternatives, including their short-term and long-term effects, as well as the impacts of accelerated construction of the RHNA number of units.

Conclusion

The draft EIR uses an adequate baseline. The environmental analyses were conducted for a reasonably foreseeable scenario (5,000 housing units per year) over a period of 30 years. The draft EIR is based on substantial evidence. It provides the public and decision makers with the most accurate and understandable picture possible, using the best information available to disclose the physical impacts of the proposed action. No additional analysis or change to the EIR conclusions is required.

Comment PD-3: Reuse of Commercial Buildings as Residential

This response addresses the comments from the commenters listed below; each comment on this topic is quoted in full below this list.

- A-Diamond-3
- A-Diamond_2-2
- A-Diamond_2-6
- A-Moore-3
- O-REP_3-5
- I-Underwood_2-3
- I-Underwood_2-5

“Third is why it is way too soon to do anything other than speculate, I’m curious at what point or when or how we go about recognizing that what we’re seeing as a result of the pandemic may not be something we necessarily think will recover.

What I mean is we may not need as much office space downtown as we planned for. And some of that office space may be developed or redeveloped with residential space.

How, if, and when might that elemental shift or have thoughts about office space downtown and substitutes for it affect our thinking about what you are proposing here on the west side?

And I recognize it is not today because it is still very speculative, but how does that potential change over the next few years play into our thinking” (*Sue Diamond, Planning Commission, June 9, 2022, [A-Diamond-3]*)

“I read with distress the many announcements of companies leaving some or all of their office space in the downtown and Mid-Market areas. Not only is the loss of the economic engine worrisome, but it also means loss of many of the smaller retailers dependent on office space use. I think we should acknowledge that the dramatic decline in the use of downtown office space is not simply a short term pandemic phenomenon but has resulted in a significant change in philosophy about remote and hybrid work. As a result, I think we should be studying right now what it would realistically take to convert some of the underutilized downtown office space into other uses such as housing, so that we are creating a vibrant mixed use downtown district that supports retail, office, housing and tourism. The Housing Element update was started before the remote/hybrid work phenomenon occurred, and is focused on the west side as the place where the bulk of the new housing should be built. However, as discussed in the DEIR, there may be insufficient transit and wastewater capacity on the west side and it may be that the City is proposing more housing on the west side than is feasible. While moving residential density to the west side is important, I think we should also be exploring as part of the Housing Element how we can incentivize the conversion of some of the underutilized perhaps older office buildings downtown to residential use.” (*Sue Diamond, Planning Commission, July 11, 2022, [A-Diamond_2-2]*)

“While it is still soon to do anything other than speculate, at what point would we recognize that we may not need as much office space downtown as planned for and some of that space may be developed or redeveloped with residential space. How, if and when might that fundamental shift change our thoughts about the amount of residential development capacity we should plan for on the west side?” (*Sue Diamond, Planning Commission, July 11, 2022, [A-Diamond_2-6]*)

“...redoing the look at the potential shift as hinted by Commissioner Diamond where less office development may create more room for adaptive re-use to housing in the Financial District.” (*Kathrin Moore, Planning Commission, June 9, 2022, [A-Moore-3]*)

“Recent reports about vacant large-scale commercial buildings in the Financial District that have potential for adaptive re-use as affordable housing have not been taken into consideration. Adaptive re-use of existing buildings has a different environmental impact than building new, especially with the potential scale of adaptive reuse that repurposing large commercial buildings could offer.” (*Joseph Smooke, Race & Equity in All Planning Coalition, July 12, 2022, [O-REP_3-5]*)

“Some other callers bought up some of the same subject matters I did in yesterday’s email. One was about the conversion of some of the commercial buildings that remain vacant downtown which I addressed yesterday but feel it’s worth mentioning again below. The response surprised me that the city is waiting for the commercial building owners to approach “the city” if they are interested in converting their buildings to residential and you stated that if it is zoned Commercial it’s automatically “Residential” I have never heard of that before.

I go back to “The City” having a plan and engaging with building owners either through BOMA or other professional organizations and brokers to find out which building owners and buildings might be considered for a relatively easy conversion into either Work/Play/Live occupancy or into retail/residential.

By way of example only, certain properties like the Embarcadero Center building complex could convert one or more of their buildings to residential or 1-3 reducing or consolidating office users and modifying some into residential unit floors. The Embarcadero Center businesses have been devastated by the pandemic because their use is retail and office. I see this time as an opportunity to bring residential into the downtown and financial area to increase foot traffic, sustain retail and restaurant businesses and other services to include weekends and holidays and create a occupancy balance like so many buildings need to be in the financial district and surrounding areas.

With so many buildings having the core infrastructure, multiple elevator bays to service specific floors, and substantial lobbies, all three uses could find a home and find economic support in each other. Modification of empty or semi-empty, high-rise buildings could provide the repeat business and the draw needed to be able to be profitable in good times and be sustainable in challenging times. It also can potentially provide a built-in work force to the area and increased housing units.

The downtown district would be a draw for new locals that would enjoy all the services in the area and easy Bart access, buses and trolleys, the street cars, concerts, the stadium, all the bars and restaurants and the Chase Center etc. Kearney Street from Market to California has suffered from vacancies and seems prime for a revitalization of new and converted buildings and the creation of more housing and support services there too. We have always gone big but now it’s about tiny homes and smaller apartments that are fully loaded and comfortable units for couples and singles. It’s the future and N.Y. has not only done it but made it lucrative, convenient and in demand for working people who want it all. Everyone’s footprint needs to get smaller. Even Pacific Heights is maintaining the historical value and aesthetics of huge single-family homes at the same time converting them into multi-family homes/condos because it makes sense for everyone.” *(Victoria Underwood, July 8, 2022, [I-Underwood_2-3])*

“If nothing, I’ve offered up a vision that could become a plan to convert existing buildings with cooperative owners to potentially support mixed uses and produce more housing units and foot traffic as well as bring more ridership into the city on Bart and create a more vibrant downtown neighborhood.

Additionally, there are dead zones like Van Ness, Kearny, and other areas on Market Street from Van Ness to the Hyatt Regency for which there is no excuse for the condition of a lot of these buildings. Some Geary areas are ripe for multi-tenant and multi-use conversions. Market Street is the main transit corridor in this city and buildings are boarded up and the streets so filthy and unsafe to walk and there is no reason to allow that to continue given what we are facing. In these times it's difficult to build new; costly, taking years start to finish, and impactful to communities. The truth is, we haven't exhausted the potential of the existing buildings we have now. I love city but it's not meeting its full existing potential.

One needs to have a plan, to secure buildings sitting on these specific, large size parcels in areas all over the city that can be acquired and/or converted to be used for the purpose of building affordable housing without impacting already vibrant neighborhoods in a negative way.

What comes first the chicken or the egg? Who knows? But I wish I could feel like the city has vision. With the participation of the real estate community and building owners, you can take the existing inventory of buildings in some of these areas already serviced by transit services and adapt them into places people want to Live/Work/Play.

I see this as the most timely and efficient way to meet the business and housing challenges facing our city. We need a revitalization. A constructive and inspiring way to bring this city back but with a new vision. Not one building should be boarded up and abandoned. Build or demolish. Not one family should be struggling on the street or city workers not being able to Live/Work/Play with dignity within the borders in San Francisco. It's not just about the current problems we need to meet but having that plan that also sets the table for this city's future growth and needs. Question is can we get out of our own way and meet the challenges and the goals we seek.”
(Victoria Underwood, July 8, 2022, [I-Underwood_2-5])

RESPONSE PD-3

The comments relate to the amount of office space in San Francisco's downtown planning district and whether the city should study or consider redevelopment of vacant office (or other commercial) space to create residential space.

Residential uses are permitted in downtown buildings, meaning that, under existing zoning controls, office buildings can be converted to residential uses. Thus, the housing element update and its future implementation actions would not preclude the conversion or redevelopment of vacant office space into residential space.

As discussed under “Proposed Action Overview” in Chapter 2 of the EIR, the department assumes that adoption of the housing element update will lead to future actions, such as planning code amendments to increase height limits along transit corridors and modifications to density controls in low-density areas, which are primarily on the west and north sides of the city; the designation of housing sustainability districts; and approval of development projects consistent with the goals, policies, and actions of the housing element update. Although the housing element update does not include policies that specifically encourage reusing or converting vacant office space as residential space in the downtown planning district, the housing element update would not

preclude individual projects from converting vacant office space to residential uses. In addition, the housing element update includes action 42f, which would incentivize rehabilitation or adaptive reuse of residential uses in existing buildings (draft 4, October 2022). This action aims to preserve cultural resources while supporting sustainable development.

Consideration of whether the downtown planning district should have less office space in the future is beyond the scope of this EIR. Nevertheless, the EIR includes an alternative that would focus residential growth on the east side of the city, which includes downtown. Please see draft EIR p. 6-8 for a description of the Eastside Alternative. This alternative would be an enhanced continuation of the existing development pattern in the city (e.g., with height and density increases), which focuses development on the east side of the city, including the downtown planning district, and maintains lower density in the western neighborhoods. Please also refer to Response GC (CEQA)-1 for more information about the EIR's evaluation of the reasonably foreseeable environmental impacts that could occur with implementation of the housing element update. In addition, please refer to Response GC (NON-CEQA)-2 for information about the merits of the proposed action and refer to Response GC (CEQA)-3 to learn how this EIR could be used to streamline environmental review of future residential projects.

A comment was also made about the adequacy and availability of public infrastructure to support additional housing development on the west side of the city, suggesting that development should be concentrated in the downtown area instead. The draft EIR analysis determined that the proposed action would result in significant and unavoidable transit delays (Section 4.4, Transportation and Circulation) as well as water supply and wastewater impacts (Section 4.9, Utilities and Service Systems). Similar comments regarding infrastructure capacity are addressed in Response GC (CEQA)-1.

No additional analysis or change to the EIR conclusions regarding this topic is required.

C. Plans and Policies

The comments and corresponding response in this section cover topics in draft EIR Chapter 3, Plans and Policies. This topic includes:

- PP-1: San Francisco Plans and Policies

Comment PP-1: San Francisco Plans and Policies

This response addresses the comments from the commenters listed below; each comment on this topic is quoted in full below this list.

- O-LHIA-5
 - I-Hong_2-3
-

“The EIR also fails to recognize that under San Francisco’s Charter, the City’s zoning must be consistent with its general plan. Section 4.105 of San Francisco’s Charter provides that: “The Planning Department, in consultation with other departments and the City Administrator, shall periodically prepare special area, neighborhood and other plans designed to carry out the General Plan, and periodically prepare implementation programs and schedules which link the General Plan to the allocation of local, state and federal resources.”” (*Kathy Devincenzi, Laurel Heights Improvement Association, July 12, 2022, [O-LHIA-5]*)

“How will all these on going State SB’s and AB’s impact this Housing Element 2022 Plan.” (*Dennis Hong, July 11, 2022, [I-Hong_2-3]*)

RESPONSE PP-1

The comments seek clarification about how ongoing changes to housing legislation could affect the housing element update.

Another comment states the EIR is inadequate because it fails to recognize that under the city charter, zoning must be consistent with the general plan. As stated on draft EIR p. 2-20, F. Description of the Proposed Action, the housing element update does not include any specific planning code amendments, zoning changes, development projects, or other implementing measures. The comment is noted. No revisions to the draft EIR are required.

On September 28, 2022, subsequent to publication and circulation of the draft EIR, Governor Gavin Newsom signed Assembly Bill 2011, the Affordable Housing and High Road Jobs Act of 2022 (Government Code section 65912.100 seq.), into law. The act takes effect in July 2023.¹⁰

On draft EIR p. 4-7, the first full paragraph has been revised as follows:

~~Two new~~ Several state housing laws were signed by the governor in September 2021 and September 2022, after the department issued the notice of preparation for this EIR. ~~Those laws include~~ the California Housing Opportunity and More Efficiency (HOME) Act (amending Government Code section 66452.6 and adding sections 65852.21 and 66411.7) ~~and, Government Code 65913.5, and the Affordable Housing and High Road Jobs Act of 2022 (adding section 65912.100 et seq.).~~ These laws seek to increase the state’s housing supply by enabling the development of multi-family buildings in areas zoned for single-family housing (see “Population and Housing” in Section 4.1, Effects Found Not to Be Significant, for further discussion of some of these laws) and enable the development of multi-family affordable housing buildings citywide, and mixed-income buildings on commercial corridors. In general, the ~~California HOME Act and Government Code 65913.5~~ laws serve to increase the development potential in existing single-family neighborhoods and

¹⁰ Senate Bill 6, the Middle-Class Housing Act, was also signed into law by Governor Gavin Newsom on September 28, 2022. The act allows for residential development on parcels zoned with office, retail, or parking as principally permitted uses, if certain conditions are met. This act is not anticipated to have any effect in San Francisco, because residential development is already allowed under the planning code on sites zoned for office, retail, or parking.

~~commercial corridors or citywide for 100 percent affordable housing. By enabling multi-family development in single family zones, t~~These laws may largely achieve the proposed objectives of the housing element update to increase housing supply by allowing multi-family development in ~~single family~~ these neighborhoods and zones. Given the effective date of these laws, they were not considered in the growth projections developed for this EIR. Now considering the passage of these laws, this EIR likely represents a conservative environmental analysis because it likely overestimates the difference in growth anticipated under the 2050 environmental baseline compared to the proposed action.

These revisions and clarifications do not add significant new information to the draft EIR, pursuant to CEQA Guidelines section 15088.5, and do not result in any new significant impact not already identified in the draft EIR or a substantial increase in the severity of an impact identified in the draft EIR prepared for the proposed action.

D. Effects Found Not to Be Significant

The comments and corresponding responses in this section cover topics in draft EIR Section 4.1, Effects Found Not to Be Significant. These include topics related to:

- ES-1: Land Use and Planning
- ES-2: Aesthetics
- ES-3: Population and Housing
- ES-4: Greenhouse Gas Emissions
- ES-5: Recreation
- ES-6: Public Services
- ES-7: Geology and Soils
- ES-8: Hydrology and Water Quality
- ES-9: Hazards and Hazardous Materials

Comment ENS-1: Land Use and Planning

This response addresses the comments from the commenters listed below. Out of the 23 individual comments, two comments are unique and therefore quoted in full below this list. Where the same comment is made by a number of individuals, the text is provided verbatim but not repeated multiple times. The names of the individuals who made the same comment are provided following the comment. Complete letters, emails, and the transcript are provided in full in Attachments 1 and 2 of this RTC document.

- | | | |
|-------------|------------------|---------------|
| • O-JPIA-4 | • I-Eisler,M-4 | • I-Mathews-4 |
| • I-Arora-4 | • I-Greenfield-3 | • I-Miller-4 |

- | | | |
|----------------------|---------------|----------------|
| • I-Bratun-Glennon-4 | • I-Hart-4 | • I-O’Neill-3 |
| • I-Burns-4 | • I-Howell-4 | • I-Paul,J_3-4 |
| • I-Chintala-4 | • I-Kind-4 | • I-Paul,M_2-4 |
| • I-Chong,L-4 | • I-Madsen-4 | • I-Pressman-3 |
| • I-Chong,RB-4 | • I-Marks_2-4 | • I-Titus-4 |
| • I-Eisler,J-4 | • I-Martin-4 | |

“The proposed changes would irreparably divide neighborhoods in direct contradiction to one of the stated objectives of the Housing Element. In the section “Impacts and Mitigation Measures” (4.1-19 of the EIR Vol. I). Impact LU-1 dictates that “the proposed actions would not physically divide an established neighborhood.” Specifically, this section states that “the proposed action would not directly or indirectly create any new physical barriers within the city that would divide established neighborhoods.” Permitting buildings to be constructed to a height more than twice the height of the existing homes would directly and indirectly divide Jordan Park! This change would destroy the character of the neighborhood, eliminate vistas into and out of the neighborhood and materially reduce the natural sunlight in the neighborhood! All these impacts are contrary to the stated objectives of the EIR.” (*Ann Arora, July 7, 2022, [I-Arora-4]; the following commenters provided the same comment: O-JPIA-4, I-Bratun-Glennon-4, I-Burns-4, I-Chintala-4, I-Chong,L-4, I-Chong,RB-4, I-Eisler,J-4, I-Eisler,M-4, I-Hart-4, I-Howell-4, I-Kind-4, I-Madsen-4, I-Marks_2-4, I-Martin-4, I-Mathews-4, I-Miller-4, I-Paul,J_3-4, I-Paul,M_2-4, and I-Titus-4*)

“Further, the proposed changes would irreparably divide our neighborhood, again, in contradiction to one of the stated objectives of the Housing Element that “proposed actions would not divide an established neighborhood.”” (*Shannon and Shawn O’Neill, July 10, 2022, [I-O’Neill-3]; the following commenters provided the same comment: I-Greenfield-3 and I-Pressman-3*)

RESPONSE ENS-1

The comments state that the proposed action would divide communities by allowing the construction of taller buildings—specifically, in the Jordan Park neighborhood. The comments are also concerned about changes regarding the character of neighborhoods, scenic vistas, and natural sunlight as a result of the proposed action.

The draft EIR does not identify any significant impacts related to land use and planning (refer to draft EIR pp. 4.1-19 through 4.1-24). As discussed in Section 4.1, Effects Found Not to Be Significant, under Impact LU-1 on p. 4.1-19, the proposed action would not directly or indirectly create any new physical barriers within the city that would divide established neighborhoods. In addition, the proposed action would not include roadways or lead to the future construction of roadways, such as freeways, that would divide the city or isolate planning areas or

individual neighborhoods within the city. Divisions in communities can occur when new roadways, freeways, or other barriers to travel, such as soundwalls or large retaining walls, are constructed. The construction of buildings that are taller than existing buildings at a given location would not divide a community because the new buildings would not restrict or prohibit travel between different areas of the community (e.g., by placing new buildings within existing publicly accessible streets and alleys).

The character of communities and neighborhoods is not a CEQA issue; therefore, it is not discussed in the EIR. Scenic vistas are discussed under “Aesthetics” in draft EIR Section 4.1, Effects Found Not to Be Significant, and in Response ENS-2. The shadow impacts of the proposed action are discussed in draft EIR Section 4.8, Shadow, and in Responses SH-1 and SH-2.

Comment ENS-2: Aesthetics

This response addresses the comments from the commenters listed below; each comment on this topic is quoted in full below this list.

- A-Diamond-2
- A-Diamond_2-5
- A-Moore-8
- O-CHA-2
- I-Schuttish_2-1

“Second comment, and it’s related, and that is that none of the 10 visual simulations really showed what the development would look like with the residential side street height increases, whether they be 55, 65 or 85 feet.” *(Sue Diamond, Planning Commission, June 9, 2022, [A-Diamond-2])*

“None of the 10 visual simulations really show what development would look like with the residential side street height increases – whether it be 55, 65 or 85’. I think it would be helpful to add visual simulation to better show that change.” *(Sue Diamond, Planning Commission, July 11, 2022, [A-Diamond_2-5])*

“I would agree with Commissioner Diamond on the simulations of where I’d propose and where impacts are, that is in Section 1.4, 10, visual simulations of impact, they are almost undiscernible and perhaps a closer view or printing them on a larger scale would help to better understand that; otherwise, thank you, and this is a document that requires more time for us to understand and properly comment on.” *(Kathrin Moore, Planning Commission, June 9, 2022, [A-Moore-8])*

“What makes the Marina neighborhoods beautiful is the topography which allows for shared vistas and shared open space from Pacific Heights down to Cow Hollow and out to the water’s edge along the Marina Green. CHA carefully protects height limits within our boundaries to stay within 40 feet. As a result, visitors and residents driving into the city from the Golden Gate Bridge view the vistas of the neighborhoods and the beautiful topography.” (*Lori Brooke, Cow Hollow Association, July 12, 2022, [O-CHA-2]*)

“Below is a photo taken in 1961 that was recently published (July 2022) in the online version on the San Francisco Chronicle. This aerial view shows blocks in the Fillmore.

Please include this in the DEIR to illustrate an impact of a massive rezoning, which Redevelopment was fundamentally.

Since this photo was fairly early in the Redevelopment process, I assume that many other blocks were obliterated later on. (Even as late as 1979 blocks adjacent to Fillmore Street north of Geary Blvd were still empty lots).

Please include this photo in the DEIR (and maybe the Draft Element) along with a further discussion of the long term impact of this Redevelopment on housing and housing supply in San Francisco and how this Redevelopment compares with proposals to re-zone (upzone) San Francisco per the Draft Housing Element to meet the RHNA goals.” (*Georgia Schuttish, July 11, 2022, [I-Schuttish_2-1]*)

RESPONSE ENS-2

The comments related to aesthetics request additional visual simulations to show the residential side-street height increases. Also requested are visual simulations at a larger scale. In addition, the comments want the EIR to include a description of the vistas in the Marina neighborhood and a photo from 1961, along with a description of the long-term impacts of the San Francisco Redevelopment Agency.

The draft EIR presents a program-level analysis; it is not feasible or required to document views from every vantage point. Figure 4.1-1 on draft EIR p. 4.1-26 shows 10 daytime visual simulation viewpoints, along with the direction for each view. The 10 daytime visual viewpoints were selected because they include a variety of mostly unobstructed views from publicly accessible areas, which are spread throughout the city and face different directions. Figures 4.1-2 through 4.1-11, draft EIR pp. 4.1-27 through 4.1-36, show the representative daytime visual simulations at each viewpoint under 2050 environmental baseline conditions and the proposed action.

In accordance with CEQA and chapter 31 of the city administrative code, the draft EIR identifies the potential direct and indirect environmental effects of the proposed action for all applicable environmental resource topics listed in Appendix G of the CEQA Guidelines as well as other environmental effects specific to San Francisco’s urban environment, including wind and shadow impacts. For aesthetics, the city uses the following criteria to determine if the proposed action would have a significant effect:

- Have a substantial adverse effect on a scenic vista

- Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway
- Conflict with applicable zoning and other regulations governing scenic quality
- Create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area

As described in “Aesthetics” in draft EIR Section 4.1, Effects Found Not to Be Significant, impacts on scenic vistas would not be substantial, as demonstrated through the visual simulations. Additional simulations of possible changes to side streets would not address the criteria used to determine if the proposed action would result in significant effects on the physical environment.

The draft EIR did not identify any significant impacts related to aesthetics (refer to draft EIR pp. 4.1-50 through 4.1-58). The description of the vistas in the Marina neighborhood and the Cow Hollow Association’s statement about protecting height limits is noted.

The photograph from 1961, showing blocks in the Fillmore neighborhood, is noted. The EIR for the housing element update analyzes the long-term impacts of the proposed action based on the physical environment that exists, including due to past actions by other city agencies (e.g., the San Francisco Redevelopment Agency). No additional analysis or change to the EIR conclusions regarding this topic is required.

Comment ENS-3: Population and Housing

This response addresses the comments from the commenters listed below; each comment on this topic is quoted in full below this list.

- | | | |
|------------|-------------|--------------------|
| • O-CCLT-1 | • O-REP-1 | • O-REP_3-9 |
| • O-CCLT-3 | • O-REP-3 | • O-SPEAK-6 |
| • O-JTF-10 | • O-REP-4 | • I-Hestor-1 |
| • O-RDR-1 | • O-REP_3-7 | • I-Yovanopoulos-2 |

“My name is Bruce Wolfe with Cares Community Land Trust here in San Francisco, and we are a member organization of the race and equity in all planning coalition.

REP Coalition and Cares CLT urge this planning commission to thoroughly evaluate the impacts and policies that encourage the demolition, displacement, and private speculative development will have on your communities and on the environment. *(Bruce Wolfe, Cares Community Land Trust, June 9, 2022, [O-CCLT-1])*

“The DEIR fails to study the environmental impacts of gentrification and displacement. Impact PH-2 states that “proposed action will not displace substantial numbers of existing people or housing units, necessitating the construction of replacement housing.”

During the current housing element cycle, thousands of units have been demolished and this new housing element contains strategies that specifically calls for demolition of existing housing.” *(Bruce Wolfe, Cares Community Land Trust, June 9, 2022, [O-CCLT-3])*

“The City must require that current residents of buildings affected by proposed housing projects should not be displaced and be allowed to safely relocate during construction and be guaranteed housing in the proposed project upon completion at the same rent.” *(Emily Murase, Japantown Task Force, June 21, 2022, [O-JTF-10])*

“The REP Coalition and Richmond district rising urge this planning commission to formally evaluate the tax and policies that encourage demolition, displacement, and private speculation that development will have on our communities and on the environment.

REP envisions and works for planning that puts the expertise of our communities to the forefront to solve issues of displacement, unaffordability and inequality.

From a personal perspective, my family and my community has been directly impacted by displacement. [indiscernible] city-mandated destruction of our historic Japantown community by the redevelopment agency. Nobody in city government cared about the environmental impact for the thousands that took place at that time, and it seems to still be the case today.

The Draft Environmental Impact Report fails to study the impacts of the gentrification and displacement. Impact PH-2 states that the proposed action would not displace the substantial numbers of existing people or housing units, necessitating the destruction of replacement housing.

Yet during the current housing element cycle, thousands of units have been demolished, and this new housing element contains strategies that specifically call for demolition of existing housing.

This failed assessment of the real impacts facing our communities will result in furthering the devastation that has already been perpetrated by the city. The housing element must be centered on racial and social equity and not simply pay lip service to it.” *(Don Misumi, Richmond District Rising, June 9, 2022, [O-RDR-1])*

“The REP coalition urges this planning commission to thoroughly evaluate the impacts of policies and encourage demolition displacement and private speculative development will have on our communities and on the environment.

REP envisions and works for new political, economic and social systems that prioritize the dignity, health, stability and aspirations of our people of color in low-income communities and place the needs of the people

over developers' desire for-profit." (*Joseph Smooke, Race and Equity in all Planning Coalition, June 9, 2022, [O-REP-1]*)

"The DEIR fails to study the environmental impacts of gentrification and displacement. Impact PH-2 states that "the proposed action would not displace substantial numbers of existing people or housing units, necessitating the construction or replacement housing; however, during the current housing element cycle, more than 4200 units have been demolished, and this new housing element continues strategies that specifically calls for demolition of existing housing." (*Joseph Smooke, Race and Equity in all Planning Coalition, June 9, 2022, [O-REP-3]*)

"This DEIR's deficient in that it grossly underestimates the environmental impacts that will be caused by the policies recommended by the housing element. By not truly centering the housing element on racial and social equity, this housing element will cause displacement on a scale that makes redevelopment and urban renewal look quaint." (*Joseph Smooke, Race and Equity in all Planning Coalition, June 9, 2022, [O-REP-4]*)

"5. Recent reports about the proliferation of Intermediate Length Occupancy uses and Short Term Rentals and their impacts on displacement and gentrification have not been taken into consideration.

6. Recent reports about the correlation between loss of income and loss of housing have not been taken into consideration, including for example Housing Our Workers; Getting to a Jobs Housing Fit. This analysis found that only 7% of our local San Francisco workforce can afford current market rate rents and that over 40% of workers don't reside in the city, thus fueling increased commute distances and escalating global greenhouse gas emissions. The analysis demonstrates that the prohibitive costs of market housing creates a significant rent burden for workers in a wide range of jobs and concludes that San Francisco must plan for the affordable housing needs of our local San Francisco workforce in order to alleviate rent burden, lessen commute distances, and reduce our carbon footprint." (*Joseph Smooke, Race & Equity in All Planning Coalition, July 12, 2022, [O-REP_3-7]*)

"The Proposed Action or Proposed Project anticipates demolition and displacement, but the DEIR does not measure or disclose the environmental impacts of displacement. These environmental impacts of displacement must be evaluated especially in light of the data released in January of 2022 about the high rate of vacancies in San Francisco's housing stock. Whereas previously it may have been assumed that displacement of people from one socio-economic level were being replaced by another, which may have led some to conclude that there was little environmental impact, we can now see that a significant number of housing units in San Francisco are vacant while people are displaced from San Francisco as a result of Planning's market-based housing strategies. With this DEIR, there must be a study of the impacts of people with lower incomes who are displaced from San Francisco due to high housing costs, but must still commute to work because they must work at a physical

location, versus those who are able to work from home. This is a very real dynamic as the geography of work and the geography of commutes have shifted dramatically and those shifts are becoming long term. These environmental impacts must be studied by sector and income level and disclosed as part of this DEIR.” (*Joseph Smooke, Race & Equity in All Planning Coalition, July 12, 2022, [O-REP_3-9]*)

“The Westside has lower density cookie cutter row houses that reflect its working class roots. Densification, like in other parts of the City, would likely create widespread displacement and gentrification resulting from the demolition of working class housing.

Working class housing combined with inadequate infrastructure are inconsistent with the definition of a high resource area.” (*Eileen Boken, Sunset-Parkside Education and Action Committee, July 11, 2022, [O-SPEAK-6]*)

“The EIR omits a measure at issue which we have been under-producing housing for low-income people, working-class people, and instead the entire incentive is to apply, approve and build luxury housing, and that housing can’t accommodate real workers.

Workers in San Francisco in hotels and the retail district need housing. If they are not housed in San Francisco at rents they can afford or housing prices they can afford to buy, they will sprawl throughout the region, and that affects transportation, noise, air pollution, and all the things that we are trying to step down.

Instead we are going to worsen them because the developers like to say we want to build housing, and they don’t really build housing – we have a trickle-down theory of housing. If you build luxury housing, maybe we will get trickle-down housing elsewhere.

We have a lot of unequal provision of housing of the racial and social equity.

Those of us who live in the eastern part on the city know we have mixed communities, and they are being pushed out by gentrification in our neighborhoods.” (*Sue Hestor, June 9, 2022, [I-Hestor-1]*)

“Resulted in an astounding overproduction of unaffordable housing and a gross underproduction of affordable housing.

Thousands of units have been demolished during the current Housing Element cycle and Housing Element 22 relies heavily on strategies that call specifically for demolition of existing housing which will displace an inordinate number of tenants.

The DEIR fails to study the environmental impacts of gentrification and displacement and, in fact, the Impact PH-2 falsely states “the proposed action would not displace a substantial number of existing people or housing units, necessitating the construction of replacement housing.” (*Anastasia Yovanopoulos, San Francisco Tenants Union, June 9, 2022, [I-Yovanopoulos-2]*)

RESPONSE ENS-3

The comments are related to gentrification and displacement as well as the demolition of housing units as a result of the policies of the housing element update. One commenter mentions infrastructure. Please refer to Response ENS-6 for a discussion of public services, Response UT-1 for a discussion of the water supply, Response UT-2 for a discussion of wastewater, and Response UT-3 for a discussion of the Emergency Firefighting Water System. In addition, some commenters mention greenhouse gas (GHG) and having to travel farther for work. Please refer to Response ENS-4 for a discussion of GHG impacts and Response TR-1 for a discussion of VMT impacts.

This response is organized as follows:

- Gentrification and Displacement
- Housing Element 2022 Update Policies and Impact on Existing Housing Stock

Gentrification and Displacement

The draft EIR did not identify any significant impacts related to population and housing (refer to draft EIR pp. 4.1-73 through 4.1-78). Impact PH-2 in Section 4.1, Effects Found Not to Be Significant, under the Population and Housing heading, discusses the potential environmental effects associated with the displacement of people and demolition of housing units. The analysis in Impact PH-2 found that implementation of the proposed action would reduce both the direct and indirect effects associated with the displacement of vulnerable communities compared to the 2050 environmental baseline. The housing element update would strengthen the city's anti-displacement policies and address the city's extreme housing supply shortage while reducing the burdens of new housing development on the city's vulnerable communities. As stated on draft EIR p. 4.1-76, "The housing element update is San Francisco's first housing plan centered in racial and social equity. The majority of the update's policies and actions focus on advancing equitable housing access, racial and social equity, and eliminating displacement." Specifically, objective 3.c seeks to "Eliminate community displacement within areas vulnerable to displacement." The draft EIR also lists housing element update policies, which are intended to address displacement through various strategies (e.g., tenant protection, preservation of affordability, production of affordable housing, advancement of equitable access to housing resources and affordable units).

Draft EIR p. 4.1-75 notes key takeaways from a recent study on how new market-rate housing production affects displacement and replacement in the San Francisco Bay Area. The study found that in "gentrifying areas, new market-rate construction neither worsens nor eases rates of moving out. It increases rates of people moving in across all socio-economic groups, particularly high-socio-economic residents." Gentrification is a socioeconomic effect. Gentrification can mean a broad pattern of neighborhood change, typically characterized by increases in the number of higher-income households and increases in home values and/or rents over an extended period of time (e.g., 10 years or more). Gentrification can occur without displacement, and displacement can occur without gentrification. According to the Urban Displacement Project, and acknowledged in the housing element

update, many neighborhoods in San Francisco are experiencing early/ongoing or advanced gentrification or are at risk of gentrification.¹¹

The draft EIR also acknowledges that indirect and involuntary displacement has occurred and continues to occur in San Francisco. The draft EIR states on p. 4.1-75 that, based on a recent study,¹² new market-rate housing development may contribute to the indirect displacement of lower-income households nearby. On pp. 4.1-74 to 4.1-77 of the draft EIR, and discussed above, the housing element update policies address displacement through various strategies (e.g., tenant protection, preservation of affordability, production of affordable housing, advancement of equitable access to housing resources and affordable units). Furthermore, other housing element update policies and actions also address this concern, such as policy 18, action c: “Allocate resources and create an implementation plan for any applicable anti-displacement measures parallel with the adoption of zoning changes within Priority Equity Geographies” (fourth draft of San Francisco Housing Element 2022 Update, October 2022).

The department is currently conducting a racial and social equity analysis for the housing element update. It will use the results of this study to inform the creation of guidelines to avoid displacement associated with future zoning changes and development projects, consistent with housing element update objectives, policies, and actions.

One commenter mentions, but does not provide supporting information regarding, recent reports about the proliferation of intermediate-length occupancy uses and short-term rentals and questions if the draft EIR analysis takes this information into account. Although the draft EIR does not specifically mention short-term rentals under Impact PH-2, the draft EIR acknowledges that direct and indirect displacement has occurred from past government regulations and private practices. Furthermore, the housing element update includes policies and actions to address such uses. For example, policy 36 states: “Maximize the use of existing housing stock for residential use by discouraging vacancy, short-term use, and speculative resale” (fourth draft of San Francisco Housing Element 2022 Update, October 2022).

For informational purposes, the leasing of private property for short-term rentals is subject to city regulations, as administered by the San Francisco Office of Short-Term Rentals, pursuant to Administrative Code chapter 41A (refer to draft EIR p. 4.1-71). The San Francisco Office of Short-Term Rentals regulates the operation of short-term rentals, with the goal of ensuring that short-term rentals do not negatively affect the city’s housing supply.

In summary, the draft EIR found that implementation of the housing element update would strengthen the city’s anti-displacement policies and address the city’s extreme housing supply shortage while reducing the burdens of new housing development on the city’s vulnerable communities.

¹¹ Chapple, K., T. Thomas, and M. Zuk, *Urban Displacement Project*, 2021, Berkeley, CA, <https://www.urbandisplacement.org/maps/sf-bay-area-gentrification-and-displacement/>, accessed October 11, 2022.

¹² IGS, University of California, Berkeley, *Housing Market Interventions and Residential Mobility in the San Francisco Bay Area*, March 2022, <https://www.frbsf.org/community-development/wp-content/uploads/sites/3/housing-market-interventions-and-residential-mobility-in-the-san-francisco-bay-area.pdf>, accessed March 23, 2022.

Housing Element 2022 Update Policies and Existing Housing Stock

The housing element update includes many actions to strengthen the city's anti-displacement policies (refer to draft EIR p. 4.1-76 for a list). For example, actions 26i and 26j identify specific circumstances for housing projects that would remove conditional use authorization as a required approval (Housing Element Goals, Objectives, Policies, and Actions, draft 4, October 2022). Action 26i would "Remove conditional use authorizations or other regulatory barriers for lot consolidation on housing applications that net two or housing units, do not demolish existing rent-controlled units, and meet tenant protection and relocation standards as recognized in Housing Crisis Act of 2019 to facilitate larger and more efficient housing projects." Action 26j would "Remove conditional use authorization requirement for demolition of single-family or multi-unit buildings that are not tenant occupied and without history of tenant evictions, that net two or more housing units, do not demolish existing rent-controlled units, and meet tenant protection and relocation standards as recognized in Housing Crisis Act of 2019. Continue to apply Conditional Use requirements to demolition of tenant occupied buildings." These changes to the planning code to streamline the project review and approval process by the department would not apply to tenant-occupied buildings.

The proposed action would not displace a substantial number of people or demolish a substantial number of housing units, thereby necessitating the construction of replacement housing. The EIR found that this impact would be less than significant. Furthermore, adherence to Planning Code section 317, which requires the replacement of residential structures lost through demolition, as well as recent amendments to state law that require the replacement of demolished units would conserve and maintain the city's housing stock. The comments do not provide specific questions or concerns about the analysis or impact determination.

For informational purposes, the planning department's 2021 Housing Inventory Report notes that a total of 12 housing units were demolished in 2021; this is below the 5-year demolition average of 128 housing units per year.¹³

Please refer to Response PD-1 for a discussion of the assumptions used to inform this program EIR.

Comment ENS-4: Greenhouse Gas Emissions

This response addresses the comments from the commenters listed below; each comment on this topic is quoted in full below this list.

- A-Moore-6
 - O-REP_3-8
-

¹³ San Francisco Planning Department, *2021 San Francisco Housing Inventory*, https://sfplanning.org/sites/default/files/documents/reports/2021_Housing_Inventory.pdf, accessed October 4, 2022.

“Together with that I think we need to look at other impacts of weather and how weather affects other elements of infrastructure, that is transportation, production of clean air electricity, and overriding issue of transportation.”
(Kathrin Moore, Planning Commission, June 9, 2022, [A-Moore-6])

“The increases in building heights prescribed and detailed in this Housing Element will lead to a significant increase in concrete and steel construction which has a far greater environmental impact than wood frame and engineered lumber construction. There are ways to reduce the impacts of these construction methods and materials, but these mitigations are neither disclosed nor discussed in the DEIR. Planning must work with the Department of Building Inspection to recommend” *(Joseph Smooke, Race & Equity in All Planning Coalition, July 12, 2022, [O-REP_3-8])*

RESPONSE ENS-4

One comment indicates that there is a need to evaluate how the effects of climate change will affect transportation and clean electricity production in the city. Another comment states that the proposed action will lead to a significant increase in “concrete and steel construction,” which has a greater environmental impact compared with the wood-frame and engineered-lumber construction typical of shorter buildings, and that the EIR does not disclose or discuss any mitigation to reduce the impact of this change.

This response is organized as follows:

- Climate Change
- Concrete and Steel
- Significance Determination

Climate Change

CEQA requires an EIR to evaluate and disclose a project’s impacts on the environment rather than the existing environment’s impacts on a project. The draft EIR recognizes the effects of climate change as part of the existing environmental setting in the air quality and greenhouse gas (GHG) topic areas (draft EIR p 4.1-78 and p. 4.6-9). Impacts from proposed action-related GHG emissions were evaluated in draft EIR Section 4.1, Effects Found Not to Be Significant, under Impact GHG-1 on draft EIR p. 4.1-92 in accordance with the *California Building Industry Association v. Bay Area Air Quality Management District* court case.¹⁴ This case established that the effects of the environment on a project are not considered impacts under CEQA, unless a project exacerbates the hazard or worsens the effect. As for the commenter’s request for more information about how climate change is affecting San Francisco’s infrastructure, the city is undertaking numerous strategies to reduce emissions and adapt to a changing climate. More information about these efforts is available in San Francisco’s Climate Action

¹⁴ *California Building Industry Association v. Bay Area Air Quality Management District*, Supreme Court Case No. S213478.

Plan¹⁵ and Hazards and Climate Resilience Plan.¹⁶ As of publication of this RTC document, the planning commission had adopted the update to the safety and resilience element of the San Francisco General Plan on September 29, 2022, and forwarded it to the board of supervisors for consideration and final adoption. The element's update strengthens support for racial and social equity, environmental justice, climate mitigation, and climate adaptation.

Concrete and Steel

It is speculative to estimate the amount of concrete and steel used in the construction of housing units under the housing element update compared to the 2014 housing element. The proposed action would not implement specific changes to existing land use controls or building code requirements or approve any physical development. However, the EIR notes the reasonably foreseeable impacts of future actions that would implement the housing element update, including anticipated housing production levels and distributions, and a range of building types that would be consistent with the housing element update.

Many factors affect a developer's selection of construction materials for a building, including sub-surface conditions, the price of materials, and the height of the building. Draft EIR p. 4.6-40 (air quality section) makes note of the distribution of taller buildings under the existing 2014 housing element and the housing element update:

Overall, the range of building types analyzed are not unique to the proposed action, as these building types could also be constructed under the existing 2014 housing element and the city's existing zoning. The main difference between the proposed action and the existing 2014 housing element is the increase in units and shift of where these building types could occur in the city. For example, buildings up to 590 feet tall would be more common under the existing 2014 housing element and located primarily in the east side of the city. Future development consistent with the proposed action could also include the construction of buildings up to 590 feet tall primarily in the east side of the city; however, the proposed action would focus an increased portion of growth in well-resourced areas in the west and north sides of the city in buildings that are 240 feet tall or less.

Although the proposed action would lead to more housing units than the existing 2014 housing element, as noted above, the additional housing units would not necessarily require concrete or steel for construction. For example, the proposed action recommends promoting small and midrise multi-family development. Midrise development is typically between five and 10 stories. Generally, it uses non-Type 1 construction materials, such as wood or metal over one to three stories of concrete. Non-Type 1 construction may be used for buildings where the last occupied floor is below 75 feet, which typically corresponds to a roof height of 85 feet under the planning code. Buildings where the last occupied floor is 75 feet or higher (generally above 85 feet under the planning code) are required to use more material-intensive Type 1 construction, which allows the use of structural steel and/or concrete. Given these considerations, it would be speculative to estimate the amount of concrete and

¹⁵ San Francisco Department of the Environment, *San Francisco's Climate Action Plan*, 2021, https://sfenvironment.org/sites/default/files/2021_climate_action_plan.pdf, accessed October 11, 2022.

¹⁶ City and County of San Francisco, *Hazards and Climate Resilience Plan*, March 2020, https://onesanfrancisco.org/sites/default/files/inline-files/HCR_FullReport_200326_0.pdf, accessed October 11, 2022.

steel used in the construction of housing units under the housing element update compared to the 2014 housing element.

Significance Determination

The EIR analysis determined that the proposed action would have less-than-significant GHG impacts after considering the various sectors that affect GHG emissions (e.g., transportation, energy, waste, water and wastewater) and reviewing the proposed action's compliance with plans, policies, or regulations adopted for the purpose of reducing GHG emissions. Thus, mitigation to address GHG emissions resulting from the proposed action is not required.

Comment ENS-5: Recreation

This response addresses the comments from the commenters listed below. Out of the 25 individual comments, five comments are unique and therefore quoted in full below this list. Where the same comment is made by a number of individuals, the text is provided verbatim but not repeated multiple times. The names of the individuals who made the same comment are provided following the comment. Complete letters, emails, and the transcript are provided in full in Attachments 1 and 2 of this RTC document.

- | | | |
|----------------------|----------------|----------------|
| • A-Diamond-4 | • Chong,RB-3 | • I-Marks_2-3 |
| • A-Diamond_2-7 | • I-Eisler,J-3 | • I-Martin-3 |
| • O-JPIA-3 | • I-Eisler,M-3 | • I-Mathews-3 |
| • O-JTF-17 | • I-Golden,A-3 | • I-Miller-3 |
| • I-Arora-3 | • I-Hart-3 | • I-Paul,J_3-3 |
| • I-Bratun-Glennon-3 | • I-Howell-3 | • I-Paul,M_2-3 |
| • I-Burns-3 | • I-Kind-3 | • I-Titus-3 |
| • I-Chintala-3 | • I-Madsen-3 | |
| • I-Chong,L-3 | • I-Marks-1 | |

“Fourth point is as we increase density on the west side, we are going to be losing backyards, increasing shading on school yards and parks while at the same time increasing demand for recreational facilities on the west side, which is just playgrounds and athletic fields.

Page 4.1-108 says that "Although the recreational facilities on the west side are larger and far more abundant, that the increase in demand as a result of the future development consistent with the housing element update would exceed the existing capacities of these recreational facilities."

The Draft EIR then goes on to state that only six of the sixty-six planned new recreational facilities are on the west side. That Draft EIR cites some broad policies about Park and Rec maintaining parks to reduce the physical degradation, but I am just having a hard time, based on the information provided so far, reconciling the conclusion of "no physical degradation" in light of the intense proposed increase in use from the proposed action, when only six of sixty-six new parks and facilities are planned for the west side.

So, I would like to see a lot more supportive information that gets to the DEIR's conclusion on this point." (*Sue Diamond, Planning Commission, June 9, 2022, [A-Diamond-4]*)

"As we increase density on the west side we will be losing backyards, increasing shading on school yards and parks while at the same time increasing demand for recreational facilities such as playgrounds and athletic fields. Page 4.1-108 says that although the recreational facilities in the west are larger and more abundant, the increase in demand as a result of the future development consistent with the housing element update would exceed the existing capacity of these recreational facilities. The DEIR then states that only 6 of the 66 new recreational facilities are on the west side. Even though the DEIR cites some broad policies about Park and Rec maintaining parks to reduce physical degradation, I am having a hard time reconciling the conclusion of no physical degradation in light of the intense increase in use from this proposed action when only 6 of 66 new parks and facilities are planned for the west side. I would like to see more information provided in support of the DEIR's conclusion." (*Sue Diamond, Planning Commission, July 11, 2022, [A-Diamond_2-7]*)

The DEIR states that the City will acquire and develop more parks and open space, as well as public services facilities, such as fire stations, police stations, schools and libraries, to meet the increased demand. There is no detail in the DEIR about where such facilities would be located in or near Japantown. This merits further clarification." (*Emily Murase, Japantown Task Force, June 21, 2022, [O-JTF-17]*)

"From more technical viewpoint, as it currently exists, the West Side does not have the infrastructure (e.g. roads, parking, facilities, wastewater capacity, etc.) to bear the burden of the proposed development. For example, while the city plans to add 66 new recreational facilities by 2050, and our neighborhoods are currently well served in this regard, only six of the 66 planned new facilities are to be located in the West Side of the City. Thus, the West Side will be underserved in the future should this plan be realized." (*Ann Arora, July 7, 2022, [I-Arora-3]; the following commenters provided the same comment: O-JPIA-3, I-Bratun-Glennon-3, I-Burns-3, I-Chintala-3, I-Chong,L-3, I-Chong,RB-3, I-Eisler,J-3, I-Eisler,M-3, I-Golden,A-3, I-Hart-3, I-Howell-3, I-Kind-3, I-Madsen-3, I-Marks_2-3, I-Martin-3, I-Mathews-3, I-Miller-3, I-Paul,J_3-3, I-Paul,M_2-3, and I-Titus-3*)

It has just come to my attention that there are proposed Height Limit/zoning changes that are incorporated in the "raft [*sic*] Environmental Impact Report Volume I for the San Francisco Housing Element 2022 Update" of the

General Plan that impact Jordan Park. They appear to be buried on page 2-25 (Fig. 2-7) within the 600+ page report.

We do not have the infrastructure (e.g. roads, parking, facilities and wastewater capacity) to bear this burden. For example, while the city plans to add 66 new recreational facilities by 2050, and our neighborhoods are currently well served in this regard, only six of the 66 planned new facilities are to be located in the West Side of the City. Thus, the West Side will be underserved in the future should this plan continue to gain acceptance.” (*Laurie Marks, June 16, 2022, [I-Marks-1]*)

RESPONSE ENS-5

The comments state that future development consistent with the housing element update would result in development on the westside and that, with the increased density, the existing infrastructure, such as roads, parking areas, recreational facilities, and wastewater facilities, would be inadequate and unable to serve such development. The comments request clarification regarding where new public facilities and infrastructure would be located, particularly in areas near Japantown. In addition, the comments request clarification about the EIR impact conclusion regarding the physical deterioration of recreational facilities under the proposed action.

The housing element update does not include any specific planning code amendments, zoning changes, development projects, or other implementing measures. Please refer to Response PD-1 for a discussion of the assumptions used to inform this program EIR. Comments related to shadow, including shading on schools, are addressed in Responses SH-1 and SH-2. Comments related to infrastructure capacity, including transportation and utility infrastructure capacity, are addressed in Response GC (CEQA)-1. Comments related to infrastructure for the city water supply are addressed in Response UT-1. Parking capacity is not a CEQA issue and thus is not discussed in the EIR. To the extent that a parking deficit results, the indirect effects are addressed in the analysis.

In accordance with CEQA Guidelines and chapter 31 of the city’s administrative code, a project would have a significant impact related to recreational resources if it would increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated or if the project would include recreational facilities or require the construction or expansion of recreational facilities, which could have an adverse physical effect on the environment.

The draft EIR identified significant impacts related to recreation that could be addressed with mitigation (refer to draft EIR pp. 4.1-107 through 4.1-111). The effects of the proposed action on recreational facilities are discussed in draft EIR Section 4.1, Effects Found Not to Be Significant, under the Recreation heading.

As discussed in the draft EIR, the San Francisco Recreation and Parks Department (SFRPD) has plans to establish 66 new recreational facilities throughout the city, six of which would be located in the western portion of the city and within 0.25 mile of where future growth is projected to be concentrated as a result of the proposed action. Future park sites are shown in **draft EIR Figures 4.1-17a through 4.1-17f**, pp. 4.1-100 through 4.1-105. These new parks and recreational facilities would alleviate the demand for recreational facilities throughout the city. Additional recreational parkland and facilities on the west side of the city include the Golden Gate National

Recreation Area, which is an expansive recreational area along the western coastline managed by the National Park Service. Though the Golden Gate National Recreation Area is not under SFRPD jurisdiction, it provides additional public recreational space for residents and visitors to San Francisco and supplements SFRPD parks and facilities. Furthermore, the SFRPD acquires new parkland as funding and resources become available. This could lead to new parks on the west side, beyond those identified in the draft EIR, if the need is demonstrated. Future development under the proposed action would occur incrementally over time. SFRPD would evaluate the need for additional parks as new housing is constructed. The EIR acknowledges that new recreational facilities and open space would be needed to serve the increased development under the proposed action. In addition, impacts related to the construction or expansion of recreational facilities could result in significant impacts, which most likely would be mitigated, as discussed in the draft EIR. Also, in accordance with general plan policy 1.4 of the recreation and open space element, SFRPD performs regular maintenance at its parks, open spaces, and facilities to reduce the physical degradation that can occur with increased use. This general plan policy is implemented through the SFRPD Strategic Plan, which is updated annually and has a 5-year planning horizon; the plan would continue under the housing element update. Therefore, although some deterioration would occur as a result of increased use of existing parks, substantial physical deterioration is not anticipated.

For these reasons, the draft EIR concluded that the proposed action would have a less-than-significant impact with respect to the physical deterioration of recreational facilities.

The locations for future public service facilities, such as fire stations, police stations, schools, and libraries, have not yet been determined. Such facilities would be determined based on future need. According to **draft EIR Figure 4.1-17b**, p. 4.1-101, three future parks would be located in or near Japantown; two would be located near Webster Street between Geary Street and Bush Street and one would be located near the intersection of Fillmore Street and O'Farrell Street. The discussion under "Public Services" in draft EIR Section 4.1, Effects Found Not to Be Significant, and Response ENS-6 discuss this topic in more detail.

No additional analysis or change to the EIR conclusions regarding this topic is required.

Comment ENS-6: Public Services

This response addresses the comment below; the comment on this topic is quoted in full.

- O-SPEAK-5

"There are inadequate Emergency Firefighting Water System (EFWS/AWSS) pipes west of 19th Avenue. Besides expanding the pipes, an oceanside pump station would need to be installed.

Based on online sources, the San Francisco Fire Department has 48 stations (including SFO) but only 9 are located on the Westside. This coverage seems to have been designed for a lower density.

The electrical grid capacity appears to have also been designed for lower density with most wiring being overhead rather than underground.

The California Independent System Operator (CalISO) reports that there may be a statewide shortage of electricity during extreme climate events.

The Sunset-Parkside has only one police station with Taraval Station covering the largest geographic area in the City. This also appears to have been designed to be consistent with a lower density.” (*Eileen Boken, July 11, 2022, [O-SPEAK-5]*)

RESPONSE ENS-6

The comment states that public services and utilities on the west side of the city are inadequate—specifically, the fire stations, police stations, pump stations, and water pipes west of 19th Avenue for emergency firefighting. The capacity of the electrical grid is also inadequate.

Section 4.9, Utilities and Service Systems, of the draft EIR discusses the proposed action’s impact on the water supply, pump stations, and the capacity of the electrical grid. Response UT-1, Response UT-2, Response UT-3, and Response GC (CEQA)-1 address the aforementioned topics as well as issues pertaining to the water supply for emergency firefighting.

Draft EIR Section 4.1, Effects Found Not to Be Significant, under the Public Services heading, discloses that increased development as a result of the proposed action may result in the need for new or expanded government facilities over time, including fire and police stations. Furthermore, the potential significant impacts resulting from the construction of these facilities could be mitigated to a less-than-significant level (refer to draft EIR pp. 4.1-121 through 4.1-129). Specifically, under Impacts PS-1 and PS-2, the San Francisco Fire Department (SFFD) and San Francisco Police Department (SFPD) would construct new fire and police facilities or expand existing facilities to accommodate the anticipated increase in demand for fire protection and police protection as a result of future development consistent with the proposed action. The SFFD and SFPD conduct regular assessments of service capacity and response times to determine where a need for additional facilities exists and would continue to do so in response to projected growth citywide under the housing element update. The new or expanded fire and police facilities needed to serve the growth anticipated as a result of the proposed action would be subject to project-level environmental review in accordance with CEQA at the time the facilities are proposed. As a result, the draft EIR did not identify any significant impacts related to public services after mitigation.

As discussed under Impacts UT-3 and C-UT-2 (refer to draft EIR pp. 4.9-33 and 34 and 4.9-39), development under the proposed action would be infill development and located within areas that are served by the existing Pacific Gas & Electric Company (PG&E) power grid. According to the San Francisco Public Utilities Commission (SFPUC), future development would require only local connections to the existing PG&E grid rather than new or expanded facilities (e.g., electrical substations, telecommunications towers). Implementation of the proposed action is not anticipated to require the undergrounding of existing overhead wires. However, should any undergrounding of utilities or new or expanded electric or telecommunications facilities be needed, these projects would be subject to separate project-level environmental review at the time they are proposed. It is likely that any potentially significant impacts resulting from such projects could be reduced to a less-than-significant level with mitigation.

The potential for a statewide shortage of electricity during extreme weather events is outside the scope of this EIR.

No additional analysis or change to the EIR conclusions regarding this topic is required.

Comment ENS-7: Geology and Soils

This response addresses the comments from the commenters listed below; each comment on this topic is quoted in full below this list.

- I-Robbins-1
- I-Robbins_2-1
- I-Schuttish-3

“I have been the owner of 189 Collins St. 94118 for 34 years. The length of my property adjoins the back of a commercial building at 2900 Geary. The Draft EIR proposal threatens my children's entire inheritance. If and when a developer constructs an 85 foot high apartment complex at 2900 Geary, my 1915 Edwardian will collapse into the excavations! OR will the developer be required to pay me the 3 million dollars the property is worth?

Do you have any idea how this proposal impacts the constant efforts of an 80-year-old widow to maintain and improve her property for her children? This proposal could literally wipe me out.” (*Sallie Robbins, July 2, 2022, [I-Robbins-1]*)

“I am an older person with medical conditions whose property directly borders a commercial building at 2900 Geary. If an 85 ft. high building were constructed at this location, the structural stability of my 1915 Edwardian is at risk, the height would ruin my garden as it would be in constant shade, the property value would be at least halved and the stress of endless construction noise would greatly compromise my health. This home is my children's inheritance. Would there be exemptions for a person in my situation?

I have plans to install solar panels and believe that any building which blocks the sun could not be constructed. Please also address this issue.” (*Sallie Robbins, July 7, 2022, [I-Robbins_2-1]*)

“Seventy-two percent chance of an earthquake is mentioned in here. What are the rebuilding plans if there's something truly catastrophic in these next 30 years? How will ownership and occupancy records be maintained to facilitate rebuilding?

And the seismic slope and hazard zone? That was changed from 20 percent to 25 percent? That is on page 4.1-162. I think the 20 percent is more prudent.” (*Georgia Schuttish, June 9, 2022, [I-Schuttish-3]*)

RESPONSE ENS-7

The comments concern impacts related to geology and soils—specifically, the risk from seismic hazards, including earthquakes and landslides; the effects of increased excavation for taller buildings on the structural stability of existing buildings; and increases in shading on private properties, including shading on solar panels.

One comment concerns the maintenance of ownership or occupancy data for individual parcels. The comment is noted but does not relate to a physical environmental impact under CEQA. Therefore, no response is required. In addition, the effect of the proposed action on existing property values is a socioeconomic issue that is outside the scope of CEQA.

Project impacts related to geology and soils are discussed in draft EIR Section 4.1, Effects Found Not to Be Significant, under “Geology and Soils” on pp. 4.1-166 through 4.1-172. The building department oversees compliance with state and local building codes and its implementing procedures. This regulatory process ensures that new construction in San Francisco meets minimum life safety standards, including those related to seismic hazards.

As discussed in the draft EIR, properties in the city within state-designated seismic hazard zones for liquefaction and landslide hazards are subject to the state building code provisions and requirements under the Seismic Hazards Mapping Act as well as provisions in the local Slope and Seismic Hazard Protection Act, part of the San Francisco Building Code. The provisions state that future development consistent with the proposed action on parcels with an average slope that exceeds 4H:1V (25 percent), as well as other properties, may be subject to Slope and Seismic Hazard Protection Zone requirements and additional review related to geotechnical recommendations.

The comment incorrectly states that the criterion for applying the Slope and Seismic Hazard Protection Zone requirements, particularly those related to geotechnical investigations, was revised from 20 percent to 25 percent. The building department has not used 20 percent as a criterion for requiring geotechnical investigation. The requirements are described in Building Code section 1803 as well as in the building department’s information sheet, S-05, Geotechnical Report Requirements. The requirement regarding the scope of geotechnical investigation for a project is determined by the scope of the proposed work as well as subsurface geologic conditions. The criterion for an average slope that exceeds 4H:1V (25 percent) is the screening threshold that is used by the building department to determine the applicability of the Slope and Seismic Hazard Protection Act to a project.

As explained on draft EIR p. 4.1-171, any building constructed under the proposed action would be supported on a foundation that would be determined to be appropriate for the proposed structure through site-specific geotechnical investigations. Future development under the proposed action would be required to comply with building code requirements and the building department’s implementing procedures. Prior to approval, the building department, through its permit review process, would ensure that specific development projects consistent with the housing element update would be in conformance with geotechnical recommendations from a state-licensed qualified engineer.

Draft EIR pp. 4.1-162 to 4.1-163 describe state and local building code requirements. The building code requires the protection of adjacent development. For that reason, the geotechnical recommendations also concern the shoring methods used during construction as well as the underpinning of adjacent structures and foundations, as necessary. If required or determined necessary by the building department, projects may be subject to geotechnical and/or structural peer review. In addition, projects proposing buildings greater than 240 feet in height would be subject to independent review by qualified structural and geotechnical engineers through an engineering design review team assessment. For these reasons, the proposed action would not result in significant impacts related to geology and soils.

Shadow impacts are discussed in draft EIR Section 4.8, Shadow, of the draft EIR and in Response SH-1. The CEQA threshold for shadow impacts assesses a project's potential to create new shadows that would substantially and adversely affect the use and enjoyment of publicly accessible open spaces. A private garden or private rooftop at a house, including a rooftop with solar panels, does not qualify as a publicly accessible open space and therefore is not analyzed under CEQA.

No additional analysis or change to the EIR conclusions regarding this topic is required.

Comment ENS-8: Hydrology and Water Quality

This response addresses the comments from the commenters listed below; each comment on this topic is quoted in full below this list.

- A-Moore-2
- A-Moore-4

“One of the issues as I look at land scarcity as market-rate housing gobbles up further and further land and gives fewer opportunities for affordable housing, I would like to see the EIR address the issue of loss during sea-level rise and costs associated with preventing sea-level rise, particularly in established already settled part of the city, that is downtown...” (*Kathrin Moore, Planning Commission, June 9, 2022, [A-Moore-2]*)

“And I would like to see a clearer understanding of how downtown is threatened by sea level rise and how we bring that into the equation in looking ahead for 2050 where sea level rise will have taken a noticeable toll on areas we are currently considering for development.” (*Kathrin Moore, Planning Commission, June 9, 2022, [A-Moore-4]*)

RESPONSE ENS-8

The comments are related to sea-level rise, including the potential loss of housing and the costs associated with prevention, particularly in the downtown area of the city. Analysis of the environment's impact on a project is

generally outside the scope of CEQA, except when a project would exacerbate environmental hazards and thereby worsen the environmental condition or hazard. The proposed action would not exacerbate any impacts on housing as a result of sea-level rise because it does not call for housing to be built in the areas that are most vulnerable to sea-level rise.

As discussed under “Hydrology and Water Quality” in draft EIR Section 4.1, Effects Found Not to Be Significant, the draft EIR did not identify any significant impacts related to hydrology and water quality (refer to draft EIR pp. 4.1-196 through 4.1-204). As stated on draft EIR p. 4.1-179,

The 2018 State of California Sea-Level Rise Guidance provides a science-based methodology for state and local governments to use in analyzing and assessing the risks associated with sea-level rise and incorporating sea-level rise into planning, permitting, and investment decisions. Projections regarding the extent of sea-level rise go from the low-risk range up to the extreme “high-greenhouse gas emissions” scenario. The document provides projections regarding the rates of sea-level rise in the city for the likely range (66 percent probability sea level rise) and the 1-in-200 chance (0.5 percent sea level rise). The 66 percent probability of sea-level rise range from 0.5 feet to 1.1 feet between 2030 and 2050. Figures 4.1-32 through 4.1-35, pp. 4.1-182 through 4.1-185, show the areas of inundation for projected sea level rise under the likely range and 1-in-200 chance scenarios in 2050 and 2100 under high emissions. The Ocean Protection Council’s sea-level rise guidance identifies steps that will provide a decision framework for evaluating the consequences and risk tolerances of various planning decisions and, if necessary, developing adaptation pathways to increase resiliency to sea-level rise. If projections are exceeded, contingency plans are included.

In addition, as stated on draft EIR p. 4.1-201,

As shown in Figures 4.1-32 through 4.1-35, pp. 4.1-182 through 4.1-185, the areas of the city that are vulnerable to coastal flooding under both existing 2020 conditions and in the future with projected sea level rise are located primarily in the low-lying areas near the bay, the western shoreline, and in South of Market near Islais and Mission creeks. The proposed action would not result in increased development in these areas but would direct an increased share of the city’s future growth to areas of the city that are outside of the existing special flood hazard areas and areas that may be affected by future sea level rise compared to the 2050 environmental baseline. As shown in Figures 4.1-34 and 4.1-35, pp. 4.1-184 and 4.1-185, small portions of the city in the Marina and Richmond planning districts may be vulnerable to coastal flooding in the future due to projected sea level rise in 2100 without intervention, such as seawalls, levees, or other flood control measures. Nevertheless, by shifting a greater portion of future growth away from existing and future flood hazard areas in the eastern side of the city to areas that are less vulnerable to coastal flooding, the proposed action would decrease the overall risk of flooding relative to the 2050 environmental baseline.

The proposed action would most likely result in the loss of fewer housing units from sea-level rise compared with the 2050 environmental baseline because of the shift in future growth away from the east side of the city. The 2018 California Sea-Level Rise Guidance will aid the city in making planning decisions regarding the downtown area and sea-level rise. However, this topic, along with the costs associated with addressing sea-level rise, is beyond the scope of this EIR.

No additional analysis or change to the EIR conclusions regarding this topic is required.

Comment ENS-9: Hazardous Materials

This response addresses the comment from the commenter listed below; the comment on this topic is quoted in full below this list.

- I-Roberson_2-3

“Getting hyper local, because I live near the 3333 California housing project, I’ll ask what regulations are required of the developers to ensure that the excavated soils, possibly contaminated with 100 year old mortuary chemicals, are not gently wafting across the street to the JCC’s preschoolers and neighborhood areas? Because nothing is as fun as mixing toxins and toddlers. Just when we thought we could occasionally pull down the N95 mask...” *(Kelly Roberson, July 8, 2022, [I-Roberson_2-3])*

RESPONSE ENS-9

The comment concerns hazardous materials in excavated soils. The draft EIR did not identify any significant impacts related to hazards and hazardous materials (refer to draft EIR pp. 4.1-217 through 4.1-224). The discussion under “Hazards and Hazardous Materials” in draft EIR Section 4.1, Effects Found Not to Be Significant, explains how contaminated soils would be handled during excavation. Compliance with applicable local, state, and federal regulations, as discussed under Regulatory Framework, would ensure that impacts associated with construction within contaminated soil would be less than significant. Examples of such regulations include, but are not limited to, San Francisco Health Code article 21, San Francisco Health Code article 22A (the Maher Ordinance), San Francisco Health Code article 22B (the Construction Dust Control Ordinance), and the Construction Site Runoff Ordinance. In accordance with these regulations, projects with contaminated soils may require site remediation or actions to prevent any release of polluted runoff or airborne contaminated soil particles during construction. Refer to draft EIR Section 4.6, Air Quality, for a discussion of project impacts related to air quality during construction. If applicable, site remediation would be conducted in accordance with the requirements of the oversight agency as well as the requirements of any applicable program. Specifically, remediation could include, but would not be limited to, the removal of affected soils for disposal at a permitted hazardous materials disposal facility, implementation of a cap management plan, or the use of vapor barriers or a vapor mitigation system. The remediation procedure for future development sites would be site specific and developed by qualified environmental consultants in accordance with procedures and standards approved by the Department of Toxic Substances Control or state and regional water boards and subject to review and approval by the San Francisco Department of Public Health. In addition, typical site mitigation plans imposed under the Maher Ordinance require protocols for notification and sampling to ensure adequate characterization of contaminated soils and building materials. Prior to any construction activities associated with future development consistent with the housing element update, site mitigation, construction dust control, and asbestos dust mitigation plans and best management practices that reflect current regulatory requirements and risk management protocols in accordance with San Francisco Department of Public Health and Bay Area Air

Quality Management District oversight would be developed, as applicable. Site mitigation plans would include protocols for identifying, handling, and characterizing suspect contaminated soils and onsite monitoring.

No additional analysis or change to the EIR conclusions regarding this topic is required.

E. Cultural Resources

The comments and corresponding response in this section cover topics in draft EIR Section 4.2, Cultural Resources. These include topics related to:

- CR-1: Built-Environment Historic Resources

Comment CR-1: Built-Environment Historic Resources

This response addresses the comments from the commenters listed below. Out of the 34 individual comments, 11 comments are unique and therefore quoted in full below this list. Where the same comment is made by a number of individuals, the text is provided verbatim but not repeated multiple times. The names of the individuals who made the same comment are provided following the comment. Complete letters, emails, and the transcript are provided in full in Attachments 1 and 2 of this RTC document.

- | | | |
|----------------------|------------------|----------------|
| • A-HPC-1 | • I-Chong,RB-2 | • I-Martin-2 |
| • A-HPC-3 | • I-Eisler,J-2 | • I-Mathews-2 |
| • A-HPC-4 | • I-Eisler,M-2 | • I-Miller-2 |
| • A-HPC-5 | • I-Glick-2 | • I-O'Neill-2 |
| • A-HPC-6 | • I-Golden,A-2 | • I-Paul,J_3-2 |
| • O-JPIA-2 | • I-Greenfield-2 | • I-Paul,M_2-2 |
| • O-JTF-8 | • I-Hart-2 | • I-Pressman-2 |
| • I-Arora-2 | • I-Howell-2 | • I-Robbins-3 |
| • I-Bratun-Glennon-2 | • I-Jacobi-3 | • I-Titus-2 |
| • I-Burns-2 | • I-Kind-2 | • I-Weinberg-2 |
| • I-Chintala-2 | • I-Madsen-2 | |
| • I-Chong,L-2 | • I-Marks_2-2 | |

“The HPC found the analysis of historic resources in the DEIR to be adequate and accurate. Commissioners commented that identification of historic resources and the historic background analysis and text is well-developed, compelling, and comprehensive. The proposed historic resource mitigations measures were

extensive. Overall, the HPC found the analysis of historic resources to be thoughtful and nuanced.” (*Historic Preservation Commission, June 7, 2022, [A-HPC-1]*)

“Commissioners Nageswaran and Black found the tables in cultural resource section to be helpful and informative, especially Table 4.2-8: Summary of Historic Resource Impacts from Future Development Consistent with the Housing Element Update.” (*Historic Preservation Commission, June 7, 2022, [A-HPC-3]*)

“Commissioner Nageswaran asked for further clarity of the anticipated project-level impacts shown in Table 4.2.7: Summary of Housing Project Types Anticipated for Future Development Consistent with Housing Element Update in relationship to the housing project types shown in this table and asked for further clarity of the relationship of the project-level impacts in this table to the mitigation measures.” (*Historic Preservation Commission, June 7, 2022, [A-HPC-4]*)

“In regard to built-environment historic resource mitigations measures, Commissioner Nageswaran asked if historic resource guidelines for new development are included in the proposed mitigation measures.” (*Historic Preservation Commission, June 7, 2022, [A-HPC-5]*)

“Commissioners Black and Wright requested further clarification on the relationship of built environment historic resource review of future development projects under the proposed action with the findings of the citywide survey (SF Survey).” (*Historic Preservation Commission, June 7, 2022, [A-HPC-6]*)

“3. The DEIR states that the increased height limits and density in Japantown will lead to development pressure which will result in a greater probability that historic buildings in Japantown may be altered, demolished, relocated, and/or added to vertically or horizontally. Yet, the SFHE Update includes policies that seek to address harm to American Indian, Black, Japanese, Filipino and other communities brought by past discriminatory government actions. The Historic Preservation Commission approved two resolutions (Resolutions 0746 and 1127) that sought redress of such harms by calling on the Planning Department to develop proactive strategies to address structural and institutional racism, including improving efforts to collaborate with community members to identify and safeguard aspects of tangible and intangible heritage associated with marginalized racial and social groups, including Asian and Pacific Islander communities. This would also involve considering EIR alternatives for building projects that would produce significant impacts on historic resources.

4. There are myriad cultural assets and anchors in Japantown that have been carefully documented (i.e. Japantown Historic Context Statement, the 2013 Japantown Cultural Heritage Economic Sustainability Strategy or JCHESS). Although 72% of Japantown parcels lie within the City’s first Cultural District, the DEIR notes that 73% of Japantown’s historic aged parcels have not yet been evaluated for their historic significance. Yet, without

evaluation, the DEIR states that only 4% of Japantown's Cultural District are likely to be historic resources. It is imperative that the evaluation of historic aged parcels in Japantown for their historic significance be completed before housing projects are considered. The impacts on Japantown's historic resources are not limited to individual buildings and sites; they extend to the entire cultural district's tangible and intangible historic resources. Therefore, historic buildings and other spaces should be preserved and not lost or adversely changed. Such buildings should NOT be demolished or changed in such ways that would be incompatible with the existing historic character of Japantown.

5. The DEIR proposes mitigation measures to address adverse impacts on historic resources. They do not go far enough to uphold the Historic Preservation Commission's Resolutions 0746 and 1127 to remedy past injustices. How will the redress policies and affordability requirements protect Japantown from the impacts of the significant increase in building heights and densities on its historic resources and cultural district?" (*Emily Murase, Japantown Task Force, June 21, 2022, [O-JTF-8]*)

"The Jordan Park Historic District is eligible for the California Register of Historical Resources under "Criterion C (architecture)." The proposed height increase would destroy the existing fabric, scale and character of the neighborhood that qualifies it for consideration as a "Historical Resource." (*Ann Arora, July 7, 2022, [I-Arora-2]*; the following commenters provided the same comment: *O-JPIA-2, I-Bratun-Glennon-2, I-Burns-2, I-Chintala-2, I-Chong,L-2, I-Chong,RB-2, I-Eisler,J-2, I-Eisler,M-2, I-Greenfield-2, I-Hart-2, I-Howell-2, I-Kind-2, I-Madsen-2, I-Marks_2-2, I-Martin-2, I-Mathews-2, I-Miller-2, I-O'Neill-2, I-Paul,J_3-2, I-Paul,M_2-2, I-Pressman-2, and I-Titus-2*)

"Historical significance neighborhoods are being demolished under this plan. This needs to be analyzed in great detail." (*Linda Glick, July 11, 2022, [I-Glick-2]*; the following commenter provided the same comment: *I-Robbins-3*)

"It is incompatible with your own definition of residential historical resource and would disqualify Jordan Park which has been a residential park since it's establishment in 1906: <https://sfplanning.org/residence-parks-historic-context-statement>" (*Alexandra Golden, July 12, 2022, [I-Golden,A-2]*)

"How is the Planning Dept. taking into account the historic nature of many of the areas being decimated? How will this destruction be mitigated?" (*Mary Jacobi, July 11, 2022, [I-Jacobi-3]*)

"The Jordan Park historic District is eligible for the California Register of Historical Resources under Criterion C (architecture). In fact, I often see people walking along my street and taking pictures of the unique architectural characteristics of these homes. The proposed height increase would destroy the existing fabric, scale and

character of this neighborhood that qualifies for consideration as an Historical Resource.” (*Barbara Weinberg, July 10, 2022, [I-Weinberg-2]*)

RESPONSE CR-1

Some comments express support for the analysis of the proposed action’s potential impacts on historic resources in draft EIR Section 4.2, Cultural Resources. Some comments request clarification regarding the relationship of the findings of the citywide survey (San Francisco Cultural Resources Survey [SF Survey]) to the EIR’s analysis of impacts on built-environment historic resources and the application of mitigation measures. Other comments regard the effects of future housing development on built-environment resources, particularly in the Japantown and Jordan Park neighborhoods. Some comments ask if the EIR analyzes the demolition of neighborhoods of historical significance. The comments expressing support for the analysis in draft EIR Section 4.2 are noted.

This response is organized as follows:

- Historic Resource Analysis and Mitigation Measures
- Impacts on Built-Environment Historic Resources by Housing Project Type
- Design Guidelines as Mitigation
- Relationship of the Housing Element Update to SF Survey Findings
- Impacts on Japantown’s Built-Environment Historic Resources
- Impacts on Jordan Park Historic District
- Conclusion

Historic Resource Analysis and Mitigation Measures

Some comments suggest that impacts on historically significant neighborhoods could result from the proposed action and ask whether the department has considered the historic status of areas that may be subject to development under the proposed action and whether historic resource mitigation measures are proposed.

Impact CR-1 in draft EIR Section 4.2, Cultural Resources, presents an analysis of the impacts of the proposed action on built-environment historic resources, including historic districts. Potential impacts include impacts on known historic resources, as presented beginning on draft EIR p. 4.2-81, as well as impacts on currently unknown historic resources, as presented on draft EIR p. 4.2-83. Impact CR-1 discloses that development associated with the proposed action may have a significant impact on built-environment historic resources. Therefore, Mitigation Measures M-CR-1a through M-CR-1l are presented to lessen the proposed action’s significant impact on built-environment historic resources, as applicable. However, mitigation would not lessen the impact to a less-than-significant level. The analysis of alternatives in draft EIR Chapter 6, Alternatives, includes a Preservation Alternative that was developed to reduce impacts on built-environment historic resources. The analysis

determined that the Preservation Alternative would reduce the proposed action's impacts on built-environment historic resources but not to a less-than-significant level. The Preservation Alternative is also identified as the environmentally superior alternative. Refer to Response ALT-4 for a discussion of the environmentally superior alternative. The comments do not provide new information that is not already considered in the EIR, and no revisions to the EIR are necessary.

Impacts on Built-Environment Historic Resources by Housing Project Type

One comment requests clarity regarding **draft EIR Table 4.2-7** on pp. 4.2-85 and 4.2-86 and information as to whether the anticipated project-level impact identified for each project category represents the impact level prior to or after the application of mitigation measures included in the EIR. The following edit adds clarity to the text introducing **draft EIR Table 4.2-7** on p. 4.2-85:

For each housing project type, the table provides an example scenario, as well as the anticipated level of impact prior to mitigation for the example scenario. The housing project types in the table represent several that are anticipated to result from the proposed action, but the list is not meant to be exhaustive and does not present every future project type that could occur.

In addition, on p. 4.2-85, the title of **draft EIR Table 4.2-7** is updated for clarity as follows:

Table 4.2-7: Summary of Housing Project Types Anticipated for Future Development Consistent with the Housing Element Update and Anticipated Impacts prior to Application of Mitigation [Revised]

Design Guidelines as Mitigation

One comment requests clarity as to whether the mitigation measures for built-environment historic resources presented under Impact CR-1 in draft EIR Section 4.2 include design guidelines for the new development that may occur under the proposed action.

The proposed action includes the development of new objective design standards for the treatment of historic buildings and districts. These would be applied to future development, as applicable. Draft EIR p. 4.2-80 in Section 4.2 presents the relevant policy of the housing element update. The text has been updated and the policy number revised, in alignment with release of draft 4 of the housing element update (October 2022):

Policy ~~4237~~: Support cultural uses, activities, and architecture that sustain San Francisco's ~~dynamic and unique~~ diverse cultural heritages.

Action ~~4237.g~~: Develop objective design standards for the treatment of historic buildings and districts to provide consistent and efficient regulatory review that facilitates housing development approvals and protects the City's cultural and architectural heritages.

Because new objective design standards for the treatment of historic buildings and districts would be an outcome of the proposed action, it is anticipated that the proposed action would promote new development with a high-quality design that facilitates compatibility with historic districts and protects the city's historic resources. Therefore, the inclusion of objective design standards as additional mitigation for the significant impact on built-environment historic resources under Impact CR-1 is not necessary.

Relationship of the Housing Element Update to SF Survey Findings

One comment requests clarity regarding how a future review of housing projects associated with the proposed action will incorporate the findings of the SF Survey.

The SF Survey is an ongoing citywide historic resource survey that evaluates the status of historic resources in San Francisco neighborhoods, including areas where future housing development associated with the proposed action is anticipated to occur.

A detailed discussion of the geographic scope, methodology, and schedule for SF Survey is included on draft EIR pp. 4.2-38 through 4.2-43 in Section 4.2, Cultural Resources. Staff initiated text changes to the discussion of the SF Survey to add additional clarity. On draft EIR p. 4.2-38, the text has been revised as follows:

San Francisco Cultural Resources Survey

The San Francisco Cultural Resources Survey (SF Survey) is a historic context-based, multi-year cultural resources survey led by the department that will result in the identification, documentation, and evaluation of sites and places and resources of cultural, historical, and architectural importance across San Francisco. These places and resources include tangible aspects, such as buildings, structures, objects, sites, and districts, as well as intangible aspects, such as oral traditions, performing arts, social practices, festivals, and traditional crafts. SF Survey aims to document San Francisco's architectural heritage built environment while elevating the need to acknowledge the intangible aspects of the city's culture. This effort will be conducted through broad-scale, context-based research and make evaluations in consultation with community members for properties and assets with cultural and social associations. The results of SF Survey will help guide the department's work on decision making for future landmark designations, heritage-based initiatives, environmental review, new development projects, area plans, and building permit applications ~~other work~~. As of 2022, SF Survey is proposed for completion by 2026.

On draft EIR p. 4.2-41, the text has been revised as follows:

- **Cultural Resources Field Survey, Research, and Evaluation:** Historic Cultural resource determinations will be provided for all non-previously surveyed historic-aged properties across the city (i.e., 45 years or older at the conclusion of the SF Survey [constructed through 1981~~0~~]).⁹⁶ Survey efforts will include both desktop and field data collection followed by comprehensive consideration of applicable evaluative frameworks from historic context statements, information submitted by the public, and additional research to substantiate findings.
- **Findings and Adoption:** The historic preservation commission will hold public hearings on adoption of components of the Citywide Historic Context Statement and survey findings. Each property will be assigned a California Historical Resource Status Code. The historic preservation commission may elect to adopt the findings with or without modifications, or they may take no action and direct the team to incorporate revisions or provide additional information. Once the historic preservation commission adopts the historic context statement and survey, the findings will be forwarded to the California Office of Historic Preservation and formalized.

On draft EIR p. 4.2-41, footnote 96 has been revised as follows:

- ⁹⁶ Under CEQA, the department typically reviews properties that are more than 45 years old. Using those dates, the threshold of 1981~~0~~ was established for in-field survey work. The context statements typically include a 1989 date as a defining moment in the city's history and the start of a new period of rebuilding. The SF Survey may also evaluate potentially significant properties up until the present date

Furthermore, draft EIR p. 4.2-55 describes the various methods by which new built-environment historic resources would be identified while the housing element update remains in effect and through the 2050 horizon—specifically, “as part of SF Survey, other department or community-initiated surveys, national register or California register nominations, the department’s project-level CEQA review process, or future article 10 and article 11 designations.”

Draft EIR Table 4.2-2 presents the estimated percentage of parcels by neighborhood, based on age, that may qualify as historic resources as well as the evaluation rates of past surveys to anticipate the number of resources in each neighborhood that may contain historic resources. The text on p. 4.2-59 that follows **draft EIR Table 4.2-2** explains that the percentages reflect the expected outcomes of future surveys, designations, and evaluations and account for the increased number of socially and culturally significant resources that could be identified as a result of “SF Survey’s heightened focus on social and cultural historic contexts and community engagement.”

The analysis of Impact CR-1 under “Proposed Action Impacts to Unidentified Historic Resources” on draft EIR p. 4.2-84 further explains that “[s]ignificant individual historic resources and historic districts may be identified through the completion of the SF Survey or as a result of a project-specific evaluation conducted as part of the department’s environmental review process.”

Impacts on Japantown’s Built-Environment Historic Resources

The comments regard potential impacts on the Japantown neighborhood. A comment questions if future housing development associated with the proposed action within the boundaries of Japantown would uphold Historic Preservation Commission (HPC) resolutions to redress past harm to Japanese residents of San Francisco. A comment states that historic resource evaluations should be completed before future housing projects are approved in Japantown. Another comment asks if the historic resource mitigation presented in the EIR redresses past harm and preserves Japantown’s historic resources and cultural district.

Regarding the proposed action’s consistency with HPC resolutions 0746 and 1127, many of the housing element update’s policies have been developed to advance racial and social equity in San Francisco. For example, housing element update policy 20, action a, states that any potential zoning changes in Priority Equity Geographies, such as the Japantown Cultural District, should come through community-led processes (Draft 4, October 2022). Refer to Response ALT-1 for a discussion of the range of alternatives analyzed in the draft EIR, including the department’s efforts to prioritize racial and social equity goals in the housing element update.

Regarding the evaluation of historic resources in Japantown, **draft EIR Figure 4.2-9**, p. 4.2-54, depicts the locations of previously evaluated built-environment historic resources in Japantown associated with San Francisco’s Japanese American heritage. The presence of these built-environment resources would be

evaluated under CEQA, as required. Other built-environment resources in Japantown, including in the Japantown Cultural District, have not yet been evaluated for historic resource status. As stated on draft EIR p. 4.2-37, a cultural district designation does not automatically qualify an area and the built resources it contains as CEQA historic resources:

Although cultural districts are not historic districts and therefore do not automatically qualify as historic resources for environmental review, the existence of a cultural district suggests an increased likelihood that culturally associated historic resources are present within the cultural district boundaries.

Furthermore, the discussion under “Proposed Action Impacts to Unidentified Historic Resources,” draft EIR p. 4.2-83, notes that future evaluations will be undertaken during project-level review, as applicable. This would include potential historic resources that have not yet been evaluated in Japantown:

[F]ollowing the department’s environmental review process once a development project subject to CEQA and consistent with the housing element update is proposed, additional investigation is required to determine the project-level impact of a specific development project to built-environment historic resources. Depending upon the specific site and whether potentially affected resources have been evaluated in the past, the department may require the project sponsor to engage a qualified historic preservation professional to complete a California register evaluation of any unevaluated historic-aged built-environment resources where projects would occur.

Regarding the potential demolition or alteration of historic resources in Japantown, **draft EIR Table 4.2-8** discloses that Japantown would be anticipated to sustain a greater level of future development under the proposed action than under 2050 environmental baseline conditions. The EIR furthermore explains that such development would contribute to a significant impact on built-environment historic resources, which may include those in Japantown. Mitigation Measures M-CR-1a through M-CR-1l are presented to lessen the impacts of the proposed action but would not reduce the level of impact to less than significant.

Impacts on Jordan Park Historic District

Some comments note that Jordan Park Historic District is eligible for the California Register of Historical Resources. Commenters question if height increases within the boundaries of the Jordan Park Historic District would lead to new development consistent with the district’s characteristics.

The comments do not provide new information that is not already considered in the EIR, and no revisions to the EIR are necessary. Numerous San Francisco historic districts, including the Jordan Park Historic District, are addressed in the EIR but are not referenced by name. Draft EIR p. 4.2-44 in Section 4.2 discusses known historic districts in San Francisco, accompanied by **draft EIR Figure 4.2-8**, pp. 4.2-49 through 4.2-52, which depicts the locations of known historic districts in San Francisco, including the Jordan Park Historic District. The analysis presented under Impact CR-1 discloses that housing growth could occur within known historic districts and that the potential exists for incompatible development within those districts. Draft EIR p. 4.2-82 states that, although the department’s housing growth projection considered the presence of known historic districts, “future development consistent with the housing element update still has the potential to materially impair known historic districts.” **Draft EIR Figure 4.2-10**, p. 4.2-84, illustrates that new housing consistent with the proposed

action could be constructed in the Jordan Park Historic District. Draft EIR Table 4.2-8, p. 4.2-87, discloses that Presidio Heights, the neighborhood that includes the Jordan Park Historic District, would be anticipated to sustain a greater level of future development under the proposed action than under 2050 environmental baseline conditions. The EIR further notes that such development could contribute to a significant impact on built-environment historic resources, such as the Jordan Park Historic District. Mitigation Measures M-CR-1a through M-CR-1l are presented to lessen the impacts of the proposed action but would not reduce the level of impact to less than significant.

Conclusion

No additional analysis or change to the EIR conclusions regarding this topic is required.

F. Transportation and Circulation

The comments and corresponding responses in this section cover topics in draft EIR Section 4.4, Transportation and Circulation. These consist of topics related to:

- TR-1: Vehicle Miles Traveled
- TR-2: Safety
- TR-3: Parking

Comment TR-1: Vehicle Miles Traveled

This response addresses the comment from the commenter listed below; the comment on this topic is quoted in full below this list.

- A-Caltrans-1

“The Caltrans Office of System and Regional Planning applauds the project efforts to limit Vehicle Miles Traveled (VMT) wherever possible, and implement travel time measures to reduce transit delay caused by project impacts. The location choices for new housing developments in the coming decades should give preference to proximity to transit options so as not to induce more automobile travel and VMT in an already congested urban environment.” (*Yunsheng Luo, May 16, 2022, [A-Caltrans-1]*)

RESPONSE TR-1

The comment expresses support for the proposed action’s efforts to limit vehicle miles traveled (VMT) and implement travel-time measures to reduce transit delay caused by future development consistent with the housing element update. The comment also recommends that new housing development be located proximate to transit options to prevent additional automobile travel and VMT in congested areas.

The comment's support for the proposed action's efforts to limit VMT and implement travel-time measures is acknowledged. As described on draft EIR pp. 4.4-119 through 4.4-124, the draft EIR did not identify any significant impacts related to VMT.

This comment does not address the adequacy of the information or analysis presented in the EIR; therefore, no response is required.

Comment TR-2: Safety

This response addresses the comment from the commenter listed below; the comment on this topic is quoted in full below this list.

- O-JTF-11

“The City should require that individual housing projects in Japantown incorporate design features that would ensure that the safety of pedestrians, bicyclists and drivers are protected.” (*Emily Murase, Japantown Task Force, June 21, 2022, [O-JTF-11]*)

RESPONSE TR-2

The comment states that new housing developments within Japantown should be required to include design features that enhance safety for people bicycling, walking, or driving. Please refer to Responses GC (CEQA)-3 and GC (NON-CEQA)-4 for more information about future actions consistent with the housing element update. As described below, future development consistent with the housing element update, including new development within Japantown, may be required to incorporate design features related to transportation safety. The draft EIR did not identify any significant impacts related to potentially hazardous conditions (aka transportation safety) (refer to draft EIR pp. 4.4-92 through 4.4-96). Future development consistent with the housing element update, including new development within Japantown, would need to comply with Planning Code section 138.1, which implements the Better Streets Plan, as applicable. The planning code requires most projects to plant and maintain street trees and some larger projects to submit a streetscape plan, which may require transportation safety elements, such as wider sidewalks, transit boarding islands, and medians. City agencies would coordinate to provide guidance for applicable projects that may affect the public right-of-way.

Comment TR-3: Parking

This response addresses the comment from the commenter listed below; the comment on this topic is quoted in full below this list.

- O-JTF-12

“The City should consider the overall future parking demand in Japantown resulting from the significant increase in housing proposed under the SFHE Update policies, when evaluating the parking demand of individual building projects and their transportation impacts, as well as when considering changes to the Japantown garage. Given the importance of the retail and cultural spaces in Japantown, and the need to accommodate parking for visitors from across the City and Bay Area region, it is imperative that the Japantown garage supply NOT be decreased and be sized to adequately meet the future parking demand of residents, workers, and visitors to Japantown.” (*Emily Murase, Japantown Task Force, June 21, 2022, [O-JTF-12]*)

RESPONSE TR-3

The commenter states that the city should consider the adequacy of parking within Japantown under future development consistent with the housing element update. The draft EIR did not identify any significant impacts related to parking (see draft EIR pp. 4.4-130 and 4.4-131).

As stated on draft EIR p. 4.4-85, California Senate Bill (SB) 743 amended CEQA by adding section 21099 regarding the analysis of parking impacts from certain urban infill projects in transit priority areas. Section 21099(d), effective January 1, 2014, provides that “...parking impacts of a residential, mixed-use residential, or employment center project on an infill site located within a transit priority area shall not be considered significant impacts on the environment.” Accordingly, parking is no longer to be considered in determining if a project has the potential to result in significant environmental effects if the project meets all three criteria established in the statute.

The San Francisco Planning Department’s 2019 transportation guidelines include a screening criterion to determine if a proposed project would result in a substantial parking deficit that could result in secondary effects, such as potentially hazardous conditions for people bicycling, walking, or driving; interference with accessibility for people bicycling or walking; inadequate access for emergency vehicles; or substantial delays for public transit. As described in Impact TR-7 on draft EIR pp. 4.4-130 and 4.4-131, most areas of the city, including the Japantown neighborhood, are within the department’s map-based screening area and, therefore, would not experience a substantial vehicle parking deficit.

For informational purposes, as described on draft EIR pp. 4.4-61 and 4.4-62, the planning code does not require new development projects to provide off-street vehicle parking spaces (sections 151 and 151.1); instead, it specifies the maximum permitted number of vehicle parking spaces. For residential development, the planning code permits between one space for every four dwelling units to 1.5 spaces for every unit. The planning code sections also identify the maximum permitted number of spaces that would be subject to the criteria and procedures of a conditional use application. Mitigation Measure M-TR-4a also addresses parking and transportation demand management to reduce the number of vehicle trips from new development. New residential development within San Francisco, including Japantown, would be subject to these planning code requirements.

For informational purposes, it is assumed that the commenter is referring to the Japan Center garage (1610 Geary Boulevard) and annex (1650 Fillmore Street) operated by the San Francisco Japan Center Garage Corporation, under a lease from the City and County of San Francisco.¹⁷ Collectively, the garage and annex have 920 spaces. The San Francisco Municipal Transportation Agency (SFMTA) monitors parking garage occupancy and provides recommendations regarding rate adjustments for its parking garages on a quarterly basis. The SFMTA director and/or designee, as delegated by the SFMTA board, may approve these staff recommendations.

As described on draft EIR p. 4-5, adoption of the housing element update would not in and of itself legislate any changes in zoning or other land use regulations or approve any development projects. For the purpose of environmental analysis, the department analyzes the environmental effects of future actions consistent with the housing element. Please refer to Response GC (CEQA)-3 and Response GC (NON-CEQA)-4 for more information about future actions consistent with the housing element update. Assumptions about future development consistent with the proposed action would result in housing growth in the areas where the garages are located. Decision makers would review future development in these areas, as appropriate, including any future development that may affect the garages.

G. Wind

The comments and corresponding response in this section cover topics in draft EIR Section 4.7, Wind. These include topics related to:

- WI-1: Approach to Analysis

Comment WI-1: Approach to Analysis

This response addresses the comments from the commenters listed below; each comment on this topic is quoted in full below this list.

- O-JTF-16
- I-Robertson_3-2

“The DEIR should provide wind analyses of taller buildings in Japantown, and that stronger mitigation measures be proposed. The cumulative wind impacts of taller buildings on the small Japantown footprint must be evaluated in the DEIR, and particularly, the relative wind impacts as experienced by seniors and children. Further, the wind impacts of individual building projects should be evaluated and designed to avoid Significant wind impacts generated by taller buildings.” (*Emily Murase, Japantown Task Force, June 21, 2022, [O-JTF-16]*)

¹⁷ San Francisco Municipal Transportation Agency, *SFMTA Garages & Lots*, 2022, <https://www.sfmta.com/garages-lots/japan-center-garage>, accessed September 6, 2022.

“Wind Effects - Clearly the SF wind is a force of nature as it gusts against tall building sides and shoots down to sidewalk level. How many of your umbrellas have been claimed as a sacrifice by Huracan (the Mayan god of Wind)? I jest, but you get the point. Taller buildings produce more wind velocity at street level. So before we start blowing over our seniors, many of whom reside in the windy western SF neighborhoods, let's set the overall intent as reducing ground-level wind speeds in order that the project shall not cause equivalent wind speeds to reach or exceed a 20 mph wind hazard criterion for a single hour of the year in areas of substantial use by people walking (e.g., sidewalks, plazas, building entries, etc.). As a result, wind tunnel test of proposed buildings, and their surrounding buildings, will be required of all new buildings above 45 ft. Through this, we can avoid a future SF Chronicle headline "53 Seniors Toppled by Wind Effects on Geary this Year - Any VisionZero Traffic Improvements Were Negated." (*Kelly Roberson, July 11, 2022, [I-Roberson_3-2]*)

RESPONSE WI-1

The comments state that wind impacts, including cumulative impacts, associated with taller buildings should be evaluated in the EIR and that stronger mitigation measures should be proposed. One comment also suggests that wind tunnel testing should be required for newly proposed buildings taller than 45 feet.

Wind impacts, including cumulative impacts, are discussed in draft EIR Section 4.7, Wind. Eight key areas of the city were identified for analyzing impacts from wind, as summarized in **draft EIR Table 4.7-1**, p. 4.7-2, and shown in **draft EIR Figure 4.7-1**, p. 4.7-4. The key areas were selected to show a range of potential wind conditions throughout the city. These are representative locations where the greatest amount of future development consistent with the proposed action is likely to occur, including key areas near Japantown (Key Area 3) and areas on the west side of the city (Key Areas 4 through 8).

As described in draft EIR Section 4.7, in Key Areas 4, 5, 7, and 8, wind speeds under the proposed action would be higher than under the 2050 environmental baseline but not high enough to result in a wind hazard exceedance, resulting in less-than-significant impacts. In Key Areas 3 and 6, there would be no wind hazard exceedances under the 2050 environmental baseline, but there would be exceedances under the proposed action. In Key Area 2, wind hazard exceedances would be expected under the 2050 environmental baseline and under the proposed action. Therefore, in Key Areas 2, 3, and 6, development consistent with the proposed action that exceeds 85 feet in height would create wind hazards in publicly accessible areas with substantial pedestrian use, resulting in a significant impact.

As stated on draft EIR p. 4.7-11, and updated with a staff-initiated text change for clarity,

Consistent with current practice, the department will evaluate all future development projects consistent with the proposed action to determine if they would have a significant wind impact when required under CEQA. If determined applicable, All a 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). If the qualified expert determines that wind-tunnel testing is required due to the potential for a new or worsened wind hazard exceedance, such testing would be undertaken in coordination with department staff, pursuant to Mitigation Measure M-WI-1a. Based on the results of project-level wind tunnel testing required under Mitigation Measure M-WI-1a, Mitigation Measure M-WI-1b would also apply to projects when necessary.

Implementation of Mitigation Measures M-WI-1a and M-WI-1b would be effective at reducing or avoiding the potential for a wind hazard exceedance, but project-level analysis and cumulative analysis would still be required for future development projects that exceed 85 feet in height, including a screening assessment, as described above, when required by CEQA. Based on the department's professional experience, consultation with qualified wind impact technical specialists, and a review of wind analyses conducted for projects throughout the city, the department has determined that buildings less than 85 feet in height have no potential to create wind hazard impacts in San Francisco. Thus, the department does not require quantitative wind hazard impact analysis for buildings that are 85 feet or less in height, including buildings between 45 and 85 feet in height.

No additional analysis or change to the EIR conclusions regarding the wind analysis is required.

H. Shadow

The comments and corresponding responses in this section cover topics in draft EIR Section 4.8, Shadow. These include topics related to:

- SH-1: Approach to Analysis
- SH-2: Open Space

Comment SH-1: Approach to Analysis

This response addresses the comments from the commenters listed below; each comment on this topic is quoted in full below this list.

- O-JTF-13
- O-JTF-15
- O-LHIA-4
- I-Roberson_3-1

“The DEIR should provide more comprehensive analyses of shadow impacts in areas most impacted by the SFHE Update policies, such as Japantown. Notably, the current DEIR does NOT include a shadow analysis of the City-owned Peace Plaza, historically significant open space dedicated to the cultural life of Japantown. In addition to analyzing impacts on publicly-owned parks and open spaces, the DEIR should evaluate the impacts of taller buildings on privately owned public open spaces and overall access to sun within buildings such as in common

and recreational spaces, as they become more essential to the quality of life with greater housing and population density.” (*Emily Murase, Japantown Task Force, June 21, 2022, [O-JTF-13]*)

“Given the high concentration of seniors in Japantown, consideration should be given to ensuring that access to sun, air and light is maximized, given that seniors are more impacted by building shadows due to their limited mobility.” (*Emily Murase, Japantown Task Force, June 21, 2022, [O-JTF-15]*)

“As the DEIR states at page 2-24: "Figure 2-7 shows the projected heights and density controls for future development consistent with the housing element update." Yet, at the recent remote meeting, Planning Department staff mischaracterized Figure 2-7 as merely one option that could be adopted, rather than as the proposed project. Although everyone appeared to understand that there would be a 2-step process to enact the zoning changes - first adopting the policy changes in the housing element update and second - enacting zoning ordinances establishing increased height limits, the Planning Department repeatedly stated that enacting the housing element - the first step - would not enact the second step. However, the second step is foreseeable because the City must implement its general plan housing element.

The DEIR admits that the proposed action "would result in reasonably foreseeable indirect changes. Specifically, the department assumes that adoption of the housing element update would lead to future actions, such as planning code amendments to increase height limits along transit corridors and to modify density controls in low density areas that are primarily located on the west and north sides of the city, designation of housing sustainability districts, and approval of development projects consistent with the goals, policies, and actions of the housing element update." (DEIR S-2)

The EIR states that when the EIR uses the phrase "impacts of the proposed action," it refers to the reasonably foreseeable impacts that would result from those future implementation actions and development compared with the development anticipated under the existing 2014 housing element through 2050. Under the proposed action, the department projects approximately 150,000 housing units would be constructed in the City and County of San Francisco (city) by 2050, compared to 2020 conditions. The department projects approximately 102,000 housing units would be constructed by 2050 under the existing 2014 housing element (2050 environmental baseline). In other words, the department predicts that approximately 50,000 more housing units would be constructed by 2050 if the housing element update is adopted compared with the development anticipated under the existing 2014 housing element.” (DEIR S-2)” (*Kathy Devincenzi, Laurel Heights Improvement Association, July 12, 2022, [O-LHIA-4]*)

“Shadowing and Daylight Access - As you know, increasing building heights creates significant shadowing and daylight access issue for adjacent buildings, homes, yards, etc. In fact taller buildings "privilege" the new buildings' occupants and "diminish" the older adjacent building's residents - by substantially reducing the daylight for older buildings which are east, north, and west of newer and taller buildings. Doesn't everyone

deserve equal access to the sun and sky regardless of the building age? How is the Housing Element ensuring that no one is losing sky access? This needs to be one of the report's primary goals.” (*Kelly Roberson, July 11, 2022, [I-Roberson_3-1]*)

RESPONSE SH-1

The comments regard the effects of increased shadow from taller buildings and state that more analysis of shadow impacts on plazas and privately owned public open spaces is warranted. A comment also states that, given the number of seniors living in Japantown, access to sun, air, and light should be maximized.

The shadow analysis in the draft EIR included 30 representative open spaces, as shown in **draft EIR Figure 4.8-1**, p. 4.8-3. The spaces were selected to illustrate representative shadow impacts across open spaces, parks, and public outdoor recreational spaces across the city. This approach is consistent with analysis for a program EIR. Because of the number of facilities and the uncertainty regarding the precise location of future development consistent with the housing element update, it would not be feasible or necessary to study all open spaces in San Francisco with respect to shadow impacts. The purpose of the analysis in the EIR is to provide the public and city decision makers with information that adequately describes the generalized effects of shadows that would result from development consistent with the housing element update—specifically, the types of parks and open spaces the shadows would affect, when and where shadows could occur, and whether shadows could substantially and adversely affect the use and enjoyment of the subject parks or open spaces.

Shadow impacts on privately owned public open spaces and sidewalks are discussed on draft EIR p. 4.8-41. Impacts would be less than significant on both privately owned public open spaces and sidewalks because the overall increase in shading as a result of future development consistent with the housing element update would not represent a substantial change compared with the 2050 environmental baseline.

Regarding consideration of senior citizen access to sun, air, and light, as stated on draft EIR p. 4.8-16, analyses of shadow impacts determine if a project would “[c]reate new shadow that substantially and adversely affects the use and enjoyment of publicly accessible open spaces.” The draft EIR presents the generalized effects of shadow on representative future conditions. Compliance with regulations related to shadow, which are based on the planning code and the city’s administrative code, as discussed on draft EIR pp. 4.8-14 through 4.8-17, would occur, as applicable.

The department would evaluate future development projects for consistency with the proposed action to determine if they would have a significant shadow impact, as applicable under CEQA. Implementation of Mitigation Measure M-SH-1 would be effective at reducing or avoiding the potential for significant shadow impacts by requiring a redesign to reduce or avoid the creation of new shadows that would substantially and adversely affect the use and enjoyment of publicly accessible open spaces in some but not all cases. However, the specific location, height, massing, and orientation of individual future projects consistent with the housing element update are currently unknown. Because of the uncertainties regarding the feasibility of redesigning projects to reduce or avoid significant shadow impacts, the ability of Mitigation Measure M-SH-1 to reduce the

shadow impact to a less-than-significant level is uncertain. Therefore, shadow impacts as a result of the proposed action would be significant and unavoidable with mitigation.

No additional analysis or change to the EIR conclusions regarding the shadow analysis is required.

Comment SH-2: Open Space

This response addresses the comment from the commenter listed below; the comment on this topic is quoted in full below.

- O-JTF-14

“The City should consider requiring integration of common recreational/open spaces as part of new developments that increase housing density significantly. For example, if the Japan Center Malls were to be replaced with tall dense housing and retail space, there could be rooftop or mid-section/terraced open green spaces that provide access to fresh air, daylight, and nature.” (*Emily Murase, Japantown Task Force, June 21, 2022, [O-JTF-14]*)

RESPONSE SH-2

The comment states that the city should require recreational facilities and open spaces for new development with significant density.

The city’s planning code contains open space requirements for new residential development. Future projects consistent with the housing element update would be required to comply with the planning code with respect to the provision of open space.

No additional analysis or change to the EIR conclusions regarding this topic is required.

I. Utilities and Service Systems

The comments and corresponding responses in this section cover topics in draft EIR Section 4.9, Utilities and Service Systems. These include topics related to:

- UT-1: Water Supply
- UT-2: Wastewater
- UT-3: Emergency Firefighting Water System

Comment UT-1: Water Supply

This response addresses the comments from the commenters listed below; each comment on this topic is quoted in full below this list.

- A-Moore-5
- O-SPEAK-8
- I-Underwood_2-2
- O-LHIA-2
- I-Boken-1
- I-Winkler-4
- O-LHIA-7
- I-Jacobi-4
- O-SPEAK-4
- I-Roberson_2-4

"I found the discussion that the public as well what the commissioners listed interesting. I do believe that we need to take a closer look not only at wastewater treatment but also drinking water availability.

One public commenter spoke about the water restrictions. This is only the beginning as California is turning to more and more desert-like conditions due to increase in ambient temperature. I think the availability of drinking water will be a very critical issue to look at growth." (*Kathrin Moore, Planning Commission, June 9, 2022, [A-Moore-5]*)

"...and fails to adequately analyze the insufficiency of water supply for City residents and businesses that could foreseeably result from implementation of the policy changes set forth in the proposed project.

The proposed project would adopt policies that would foreseeably be implemented through later zoning changes because the City is obliged to implement its general plan housing element. The Draft EIR (DEIR) explains that the DEIR has been prepared to evaluate the impacts on the environment that could result from adoption and implementation of the housing element update. (DEIR S-1) The Housing Element update is mandated by state law, Government Code section 65583. (Ibid.)

The housing element update establishes goals, policies, and actions to address the existing and projected housing needs of San Francisco. (Ibid.) The goals, policies, and actions are required to plan for the regional housing targets allocated to San Francisco by regional agencies for 2023 to 2031 and to meet future housing demand in San Francisco. (Ibid.) The housing element update includes overarching goals for the future of housing in San Francisco that respond both to state law requirements as well as local community values as understood from community outreach allegedly conducted for the housing element update. (DEIR S-1-S-2) The underlying policies and actions would guide development patterns and the allocation of resources to San Francisco neighborhoods. (DEIR S-2) In general, the housing element update would shift an increased share of the City and County of San Francisco's future housing growth to transit corridors and low-density residential districts within well-resourced areas (see Figure 2-1, p. 2-2, in Chapter 2, Project Description. (DEIR S-2)" (*Kathy Devincenzi, July 12, 2022, [O-LHIA-2]*)

"The DEIR Fails to Adequately Analyze the Proposed Project's Significant Adverse Impact on Insufficiency of Water Supply Needed to Serve Foreseeable Development.

The DEIR admits that if the Bay Delta Plan is implemented, "the SFPUC would require rationing and could develop new or expanded water supply facilities to address shortfalls in single and multiple dry years. Environmental impacts related to new or expanded water supply facilities and increased rationing would result in significant and unavoidable environmental impacts. (Significant and Unavoidable)." (DEIR 4.9-14)

The DEIR admits that if "the Bay-Delta Plan Amendment is implemented, the SFPUC would be able to meet the projected demand in normal years but would experience supply shortages in single dry years and multiple dry years. Implementation of the Bay-Delta Plan Amendment would result in substantial dry-year and multiple dry-year water supply shortfalls and rationing throughout the SFPUC's regional water system service area, including San Francisco." (DEIR 4.9-2) Although the DEIR acknowledges that the "State Water Board has indicated that it intends to implement the Bay-Delta Plan Amendment on the Tuolumne River by 2022, assuming all required approvals are obtained by that time," the DEIR claims that "implementation of the Bay-Delta Plan Amendment is uncertain because of pending legal challenges and outstanding regulatory actions." (DEIR 4.9-3) Substantial evidence does not support this claim.

The text of the water supply discussion in the DEIR fails to discuss the foreseeability that any of the City's legal challenges or the outstanding regulatory actions will be successful and fails to acknowledge that the City has sued the State because the State has drastically reduced the amount of water the City can pull from the Tuolumne River to "more than the city has to spare." (See attached Courthouse News Service, San Francisco Sues State to Retain Access to Vital Water Supply, May 14, 2021, stating that City Attorney Dennis Herrera stated in an email that "the state's most recent effort - done behind closed doors - ignores the science and could leave us with virtually no water during a drought;" San Francisco, irrigation districts sue California over drought-related water restrictions, September 10, 2021, stating that drought conditions are growing worse as the climate changes and quoting a senior attorney at the Natural Resources Defense Council as having stated that, "contrary to the suit's claims, San Francisco and other pre-1914 water rights holders are in fact subject to the state board's authority.")

The DEIR misleads the decision makers and the public because it relies on the unsubstantiated claim that there is "a substantial degree of uncertainty associated with implementation of the Bay-Delta Amendment and its ultimate outcome" and because it fails to analyze the potential impacts of further decreased supplies as a result of global warming. (DEIR 4-9-20)

The DEIR is inadequate because it fails to disclose the severity of the San Francisco water supply shortages that would foreseeably result from implementation of the Bay-Delta Plan Amendment. The DEIR also fails to analyze the likelihood that the City's lawsuit or other regulatory actions will be successful in any degree.

The DEIR admits that under "the Bay-Delta Plan Amendment, existing and planned dry- year supplies would be insufficient with respect to the SFPUC satisfying its regional water system supply level-of-service goal of no more than 20 percent rationing system-wide. (DEIR 4.9-19) The DEIR states: "As shown in Table 4.9-2, shortfalls under dry-year and multiple dry- year scenarios would range from 11.2 mgd (15.9 percent) in a single dry year to 19.2

mgd (27.2 percent) in years two through five of a multiple dry-year drought, based on 2025 demand levels, and from 29.5 mgd (33.7 percent) in a single dry year to 35 mgd (40 percent) in years four and five of a multiple dry-year drought, based on 2050 demand (see Table 4.9-2)." (DEIR 4.9-19).

This analysis is inadequate because it fails to analyze the potentially significant impacts of increased water supply insufficiencies as a result of global warming. Please analyze the foreseeable impacts of global warming in increasing the water supply deficiencies in San Francisco based on the 2025 water supply demand levels and 2050 demand described above.

The DEIR admits that:

"rationing at the level that might occur under the Bay-Delta Plan Amendment would require restrictions on irrigation and other outdoor water uses (e.g., car washing), changes in water use behaviors (e.g., shorter and/or less-frequent showers), and changes in how businesses operate, all of which could lead to undesirable socioeconomic effects high levels of rationing could lead to adverse physical environmental effects, such as a loss of vegetation resulting from prolonged restrictions on irrigation. Prolonged rationing within the city could make San Francisco a less desirable location for residential and commercial development compared with other areas of the state without substantial levels of rationing, which, depending on location, could increase urban sprawl. Sprawl development is associated with numerous environmental impacts, including for example increased greenhouse gas emissions and air pollution from longer commutes and lower- density development, higher energy use, a loss of farmland, and increased water use from less water-efficient suburban development." (DEIR 4.9-25)

Please analyze the potential impacts on increased greenhouse emissions that could result from the high levels of rationing discussed above and the potential impact on reduced demand for new housing in San Francisco that could result from high levels of rationing.

The DEIR is also inadequate because it claims that the "SFPUC is in the process of exploring additional water supply opportunities through the Alternative Water Supply Planning Program. Table 4.9-3 identifies the new and expanded water supply facilities that are under consideration. Most of these projects are in the early 'feasibility' or 'conceptual' planning stages and would take several years to decades to implement." (DEIR 4.9-20) The DEIR is inadequate for relying on potential new or expanded water supply facilities without providing data showing the financial feasibility and likely funding sources for the potential new water supply projects. The tactic of relying on an unsubstantiated list of speculative expanded water supply projects has been struck down by courts.

The DEIR fails as an informative document because it fails to truthfully inform the decision makers and public of the severity of the water supply problem and the lack of a foreseeable solution to the water deficiencies that would foreseeably result from implementation of the housing element update." (*Kathy Devincenzi, Laurel Heights Improvement Association, July 12, 2022, [O-LHIA-7]*)

It's only since 2018 that all new construction has been mandated to be individually metered for water usage.

The following is a quote from the Department of the Environment regarding the requirement for individual water metering for new residential construction.

"Yes, in new construction each housing unit, each commercial tenant, and outdoor irrigation are each required to have separate utility meters or equivalent accuracy submeters per CA Plumbing Code 601.2. I think the amendment to CA Plumbing Code was adopted during the 2018 drought.

Previously, CalGreen just required commercial common area, commercial tenants, and outdoor irrigation to be separately metered in new construction. Those provisions remain, but there was an issue that some plumbing inspectors chose not to enforce CalGreen. (They viewed themselves only responsible for Plumbing code; the logic did not make sense.) So the State of CA added emphasis by amending the Plumbing Code.

The water metering requirements are noted on all of San Francisco's GS forms. The Design Professional of Record is accountable for compliance with all provisions of applicable code.

Does the City have a water rationing plan that involves retrofitting housing units built between 1990

- 2017 to install individual water meters? This would be the most reliable method of enforcing any mandatory rationing.

The SFPUC has a "water first" policy. The SFPUC produces hydro power from Hetch Hetchy. The "water first" policy states that if there is a low level of water then the SFPUC will prioritize water conveyance over producing hydro power. This could lead to shortages in hydro power for San Francisco." (Eileen Boken, July 11, 2022, [O-SPEAK-8])

"Does the draft EIR adequately address the following: the SFPUC Urban Water Management Plan states that there is adequate water for future development. On the other hand, there is current water rationing which is expected to become mandatory." (Eileen Boken, June 9, 2022, [I-Boken-1])

"Where is the 7.5 million gallons of fresh water required to service the new residents coming from. (This number is calculated from statistics derived from the SF city website.) No EIR in the 21st Century (a period of global warming and climate change) that ignores the impact of fresh water can be considered credible. It's not even a starting point." (Mary Jacobi, July 11, 2022, [I-Jacobi-4])

"Last but not least, how does the Housing Element document the necessary water allocations for any additional residences? Logic would suggest that the water resources would be known in advance before building more units. According a Report to Supervisor Preston dated Jan 31, 2022 prepared by the Budget and Legislative Analyst's Office, there are around 40,000 vacant units in 2019. Well, that's a refreshing relief in drought years. Fewer residents to draw on the limited water supply. The Housing Element's "Impact UT-1" on page 108/109 of 616 pages (or Page S-82), starts to touch on this point (maybe?), but the result is "No feasible mitigation

available.” Perhaps I’m not reading this correctly, but it does not give one confidence. Page S-99 may reference this as well. Many people, especially me, would appreciate a series of charts listing 1 - Our water reservoirs’ volume variations (naturally this varies) over the last 30 years. 2 – San Francisco’s and the Peninsula’s per capita consumption over the last 30 years. 3 – Volume of water purchased for other regions/sources. 4 – Possible volume gains from treated/decontaminated water. This basic numeric data would explain what development levels might be sustainable and add to the Housing Element report’s credibility and transparency. It does not matter how diverse, respectful, and fun loving a city could be – no water is still no water.” (*Kelly Roberson, July 8, 2022, [I-Roberson_2-4]*)

“We know that owners and developers would love to be able to eliminate all the investigative possesses associate with building and land use but that is not for the better good of those who are impacted by these projects. Along that line, Richard Frisbie had a serious and impactful question about the impact of increased housing quotas of 2.5 million units potentially in the state and the depletion of our water resources not only in this state but around the world due to draughts brought on by climate change. Kicking that to the State since Sacramento is imposing these housing numbers on the San Francisco is something that not only seems to need to be addressed for the future but for the foreseeable sustainable use. Of the residents and businesses in San Francisco.” (*Victoria Underwood, July 8, 2022, [I-Underwood_2-2]*)

“6. Climate change is an ever-increasing devastation to our planet. California is in a constant state of drought with no good news in sight. The Hetch Hetchy Reservoir, which is our main source of water, supplies 2.6 million residents with fresh water. Wildfires are a given fact of nature in this state, amplified by climate change and continual drought, and intensify the strain on our natural resources, which continue to decrease with climate change and population growth.

7. Question: Where are we going to get the additional 7.5 million gallons of water for those new residents? Are we going to build another reservoir and hire a rainmaker??” (*Calla Winkler, July 10, 2022, [I-Winkler-4]*)

RESPONSE UT-1

This response is organized as follows:

- Water Supply, Demand, and the Bay-Delta Plan Amendment
- Status of Existing Water Supply Infrastructure
- Alternative Water Supply Program
- Effects of Climate Change on Water Supply

- Not a Comment on the Draft EIR
- Conclusion

Water Supply, Demand, and the Bay-Delta Plan Amendment

The comments question whether or not an adequate water supply exists for the anticipated growth associated with the proposed action and the assumptions regarding the certainty of implementation of the Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary (Bay-Delta Plan Amendment) and its effects on the water supply for San Francisco. The comments also suggest that the EIR does not adequately address the potential effects of implementation of the Bay-Delta Plan Amendment and that it does not accurately reflect the uncertainty associated with its adoption and implementation.

In accordance with Appendix G of the CEQA Guidelines, a project would have a significant effect if it would require or result in the construction of new or expanded water facilities or relocation of existing utilities and service system facilities, the construction or relocation of which could cause significant environmental effects. In addition, a project would have a significant impact on the environment if adequate water supplies are not available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years.

San Francisco Water Supply

The EIR adequately addresses the potential indirect impacts from the proposed action related to the water supply. Information regarding the existing water supply is summarized under Environmental Setting in draft EIR Section 4.9 (pp. 4.9-1 through 4.9-4). Information regarding the projected water supply, as well as demand under the proposed action, is presented on pp. 4.9-15 through 4.9-18 of draft EIR Section 4.9, with 5-year intervals from 2025 to 2050. The projections for future water demand include the estimated water demand associated with future housing development in San Francisco and accounts for new units that would be constructed under the proposed action. Under baseline conditions, SFPUC would have adequate water supplies to meet projected water demand in normal, dry, and multiple dry years. Under the proposed action, SFPUC would have adequate water supplies to meet projected water demand in normal and single dry years, but in multiple dry years, SFPUC would experience shortages, requiring customers to reduce water use through voluntary rationing. However, no new or expanded water supply facilities are expected to be needed, even under the multiple-dry-years scenario. This is summarized in the EIR as well as **RTC Table 4-2**.

Bay-Delta Plan Amendment

In December 2018, the State Water Resources Control Board (state water board) adopted amendments to the Bay-Delta Plan Amendment to establish water quality objectives, with the stated goal of increasing salmonid populations in three San Joaquin River tributaries (i.e., the Stanislaus, Merced, and Tuolumne rivers) and the Bay-Delta. Specifically, the Bay-Delta Plan Amendment requires the release of 30 to 50 percent of the unimpaired flow¹⁸ from the three tributaries from February through June every year, whether it is a wet or a dry year. As

¹⁸ “Unimpaired flow” represents the water production of a river basin, unaltered by upstream diversions, storage, or the export or import of water to or from other watersheds.

discussed in draft EIR Section 4.9, Utilities and Service Systems, under Impact UT-1 (pp. 4.9-14 through 4.9-28), the city’s future water supply may be affected by implementation of the Bay-Delta Plan Amendment. The Bay-Delta Plan Amendment (refer to draft EIR pp. 4.9-2 and 4.9-3) is a state-level water policy that would affect the water supply throughout the state, including San Francisco, and therefore have implications on whether the city would be able to provide an adequate water supply to support its projected population growth. However, as stated on pp. 4.9-2 and 4.9-3 in draft EIR Section 4.9, “implementation of the Bay-Delta Plan Amendment is uncertain because of pending legal challenges and outstanding regulatory actions”. As a result, the draft EIR analyzes the anticipated impact of the proposed action under two scenarios, one with the Bay-Delta Plan Amendment and one without the Bay-Delta Plan Amendment. The various scenarios are described in the draft EIR and summarized in RTC Table 4-2.

RTC Table 4-2. Summary of Water Supply Impacts

		Water Supply Scenario	
	Water Year Conditions	Current Water Supply Scenario (2018 Bay-Delta Plan Amendment Is <i>Not</i> Implemented)	2018 Bay-Delta Plan Amendment Is Implemented
2050 Environmental Baseline Conditions	Normal Hydrologic Year	SFPUC would have adequate water supplies to meet projected water demand.	SFPUC would have adequate water supplies to meet projected water demand.
	Single and Multiple Dry Years	SFPUC would have adequate water supplies to meet projected water demand.	Significant water supply shortfalls are anticipated. New or expanded water supply facilities would likely be required.
Implementation of Proposed Action	Normal Hydrologic Year	SFPUC would have adequate water supplies to meet projected water demand.	SFPUC would have adequate water supplies to meet projected water demand.
	Single and Multiple Dry Years	SFPUC would have adequate water supplies to meet projected water demand in single dry years. In multiple dry years, SFPUC would experience shortages, requiring customers to reduce water use through voluntary rationing. However, no new or expanded water supply facilities are expected to be needed under this scenario.	Significant water supply shortfalls are anticipated. New or expanded water supply facilities would likely be required.

Note: See draft EIR Tables 4.9-1 and 4.9-2 on pp. 4.9-15 through 4.9-18 for more detailed information.

The scenario with the Bay-Delta Plan Amendment, summarized above, represents a conservative analysis with respect to the potential future water supply. That is, if SFPUC were to prevail in the ongoing lawsuits and the Bay-Delta Plan Amendment is not implemented, the dry-year shortages that would occur with the Bay-Delta Plan Amendment would be less severe or eliminated altogether. However, regardless of whether the proposed action is adopted, the projections show that the city would not have adequate water supplies available during single and multiple dry years if the Bay-Delta Plan Amendment is implemented. The city would need to develop new facilities or expand existing facilities to provide an adequate water supply during single and multiple dry years. In other words, even without the housing element update (i.e., under baseline conditions), the city would likely need to develop new or expanded water supply facilities in anticipation of single and multiple dry years under the Bay-Delta Plan Amendment.

The EIR finds that a significant and unavoidable impact would occur with implementation of the Bay Delta Plan Amendment because the proposed action would result in a considerable contribution to the projected dry-year shortfalls and the related need to develop new or expanded water supply facilities. The analysis under Impact UT-1 in the draft EIR is adequate, and no additional analysis or change to the EIR conclusions regarding this topic is required.

Status of Existing Water Supply Infrastructure

The comments suggest that components of the city's existing water supply infrastructure are aging and that required upgrades should be addressed in the EIR. The EIR adequately analyzes the potential effects related to the new or expanded water supply facilities that would be required to support existing development in combination with projected growth under the proposed action—specifically, the new or expanded facilities that would be required to address water supply shortfalls if the Bay-Delta Plan Amendment is implemented (see draft EIR Section 4.9, pp. 4.9-19 through 4.19-25). The EIR concludes that the construction of the new or expanded facilities could have significant and unavoidable environmental impacts. As discussed in the EIR and above, the Bay-Delta Plan Amendment is currently in litigation. The ultimate outcome (i.e., whether it is implemented and to what degree) is highly uncertain. Consequently, the amount of additional water that may ultimately be needed, if any, is also highly uncertain, as is the additional water supply infrastructure that would be required to support the potential increase in water demand. If new or expanded water supply facilities are required in the future, those projects would undergo separate project-level environmental review when they are proposed, consistent with the CEQA Guidelines. **Draft EIR Table 4.9-3** on p. 4.9-21 describes the potential environmental impacts that could result from such projects.

As stated on draft EIR p. 4-10 in Section 4.1, the routine infrastructure repair, maintenance, and improvement projects (e.g., roadway repaving, water main replacements, sewer upgrades) that currently occur would continue through 2050. These projects are considered in the EIR's cumulative analysis. Therefore, no additional analysis or change to the EIR conclusions regarding this topic is required.

Alternative Water Supply Program

One comment concerns the EIR's references to the Alternative Water Supply Program. The draft EIR's water supply analysis is not based on assumptions about implementation of the potential future water supply projects

contemplated in SFPUC's Alternative Water Supply Program. These projects and their potential contributions to the future water supply were included for informational purposes, providing supplementary information about potential projects that may expand the city's water supply during implementation of the proposed action. The analysis does not assume that these projects will be adopted.

Effects of Climate Change on Water Supply

The commenters request that the EIR address the potential effects of global climate change on the future water supply. The EIR relied on the 2020 Urban Water Management Plan (UWMP) for the water supply analysis. That document took into account the effects of climate change on the future water supply. Impact UT-1, on pp. 4.9-14 through 4.9-28 in draft EIR Section 4.9 Utilities and Service Systems, describes impacts on the water supply and the demand from anticipated growth with the proposed action, based on the 2020 UWMP's water demand projections through 2050. Section 6.1.3 of the 2020 UWMP, Climate Change Impacts to RWS Supplies, describes the anticipated effects of climate change on regional water system supplies and SFPUC's ongoing efforts to study the effects and incorporate them into water supply planning. In addition, the effects of the proposed action on GHG emissions and climate change are discussed on pp. 4.1-78 to 4.1-97 in draft EIR Section 4.1, Effects Found Not to Be Significant.

Not a Comment on the Draft EIR

The comments below are related to the water supply but are not related to CEQA. They do not identify any particular deficiencies in the analysis or conclusions of the EIR regarding the physical environmental impacts of the proposed action. Specific comments related to the adequacy of the information and analysis in the EIR are addressed in the responses under each topical subsection. Pursuant to CEQA Guidelines section 15088(c), general comments that do not contain or specifically reference readily available information may receive a general response. Thus, these comments do not require a response in this RTC document under CEQA Guidelines section 15088(c).

- *Comment Requesting Additional Information on the Source and Volume of the City's Water Supply and Historical per Capita Water Demand:* Pages 4.9-1 through 4.9-4 in Section 4.9 summarize the city's existing water supply sources. Further information about the water supply and historical water demand is outside the scope of analysis required for this EIR. The purpose of the EIR is not to present or analyze historical water supply and demand but, rather, to evaluate the impacts of the proposed action, if adopted, on water supply and demand. In addition, the UWMP projections of future water demand presented in the EIR are based on historical water use data (see draft EIR pp. 4.9-15 through 4.9-18 in Section 4.9).
- *Comment Requesting Information on Water Metering for Existing Housing in the City:* This comment pertains to existing housing in the city and not the proposed action or the EIR. The potential imposition of additional metering requirements on existing housing, as well as any related environmental impact, is outside the scope of analysis required for this EIR.
- *Comment Concerning the Effects of Increased Water Demand on the Supply of Hydroelectricity:* The comment pertains to the potential effects of increased water demand from expected housing growth on the availability of hydroelectricity. The EIR adequately analyzes the effects of the proposed action on energy

(draft EIR Section 4.1, pp. 4.1-224 to 4.1-233) and electricity infrastructure (Impact UT-3, draft EIR pp. 4.9-33 and 4.9-34 in Section 4.9).

- *Comment Concerning the Effects of Potential Water Rationing on GHG Emissions:* The comment suggests that the EIR should analyze the GHG emissions that may result from water rationing and lead to urban sprawl and increased emissions from commuting. These potential indirect effects of the proposed action are too speculative to be quantified. The EIR analyzes the impacts of the proposed action on GHG emissions (see draft EIR pp. 4.1-78 to 4.1-97 in Section 4.1).
- *Comment Concerning the Effects of Statewide Housing Quotas on Statewide Water Supply:* As discussed above under Water Supply, Demand, and the Bay-Delta Plan Amendment, the EIR adequately addresses the effects of the proposed action on water supply and demand. An analysis of the effects of statewide requirements on the statewide water supply is outside the scope of analysis required for this EIR. This EIR focuses on the effects of the proposed action on the water supply in the city (i.e., where the effects of the proposed action would occur).
- A comment also suggests that the UWMP does not cover “firefighting issues.” Refer to Response UT-3 for a discussion of the Emergency Firefighting Water System.

Conclusion

No additional analysis or change to the EIR conclusions regarding this topic is required.

Comment UT-2: Wastewater

This response addresses the comments from the commenters listed below; each comment on this topic is quoted in full below this list.

- A-Diamond-5
- A-Diamond_2-8
- O-EJA-1

“The point is the focus of this EIR appropriately is just on the Housing Element. But how do we as a Planning Department and Commission ensure that the infrastructure needed to serve the additional housing on the west side keeps a pace? And I'm particularly worried about transit and wastewater capacity upgrades in particular.

It would be helpful to know what coordination happens among the various city departments to ensure the timeline for studying, funding, and developing the infrastructure is going to keep up with the development of the housing pace that we're proposing that's being studied in this draft EIR.” (*Sue Diamond, Planning Commission, June 9, 2022, [A-Diamond-5]*)

“The focus of this EIR is on the Housing Element but how do we ensure that the infrastructure needed to service the additional housing on the west side keeps apace – transit and wastewater capacity upgrades in particular. What coordination happens among the city departments to ensure the timeline for studying, funding and developing the infrastructure keeps up with the development of housing?” (*Sue Diamond, Planning Commission, July 11, 2022, [A-Diamond_2-8]*)

“The last three Housing Element report, defective. In short, I am not going to go into the technical aspects except to speak to you as any layman would understand. You, the Planning Department, are supposed to focus on quality-of-life issues. As far as the focus of quality life issues is concerned in San Francisco, our city has gone to the hogs.

But when it comes to clean water and the sewage, you, the Planning Department, don't know what the hell is happening. The two treatment plants have hundreds of notices of violations, and no one has a clue what is happening.” (*Francisco Da Costa, Environmental Justice Advocacy, June 9, 2022, [O-EJA-1]*)

RESPONSE UT-2

The comments are in regard to understanding how city departments and agencies ensure that adequate upgrades to existing infrastructure, transit and wastewater infrastructure in particular, are made in areas that are projected to experience housing growth under the proposed action.

Ensuring that adequate infrastructure is constructed to accommodate the increased growth anticipated with the proposed action is a planning and policy matter. For CEQA, the proposed action would have a significant effect if it would require or result in the construction of new or expanded facilities or relocation of existing facilities, the construction or relocation of which could cause significant environmental effects. The EIR adequately analyzes the potential environmental impacts of the proposed action from the construction of new or expanded wastewater treatment or stormwater drainage facilities or relocation of such facilities, as required by CEQA. In general, the construction-related impacts could be mitigated.

The overall performance of the city's combined sewer system is assessed by SFPUC on a citywide scale because of the citywide nature of the system. Accordingly, measures to improve the performance of the combined sewer system are evaluated on a citywide scale. SFPUC is currently in the process of implementing the Sewer System Improvement Program, a 20-year, multi-billion-dollar citywide upgrade to the city's sewer and stormwater infrastructure to ensure a reliable and seismically safe system. The program includes planned improvements throughout the city.¹⁹ Planned infrastructure upgrades to the city's combined sewer system are evaluated on an ongoing basis as new development occurs and as the need arises in existing service areas. Furthermore, development projects in San Francisco are evaluated for compliance with the city's Stormwater Management Plan, if applicable, prior to project approval. As part of a project's approval process, including for future

¹⁹ San Francisco Public Utilities Commission, *Sewer System Improvement Program*, <https://sfpuc.org/construction-contracts/sewer-system-improvement-program>, accessed October 13, 2022.

development consistent with the proposed action, SFPUC would review a proposed project, as applicable, and determine whether wastewater infrastructure upgrades are needed to support the proposed development. Refer to Response GC (CEQA)-1 for a summary of the potential environmental impacts of future development consistent with the housing element update, including impacts on infrastructure (e.g., transit infrastructure). Refer to Response UT-1 for a summary of impacts related to the water supply. Refer to draft EIR Section 4.9, Utilities and Service Systems, under Impact UT-2 (pp. 4.9-28 through 4.9-33) for a discussion of the impacts related new or expanded wastewater treatment facilities.

One comment pertains to permit violations at wastewater treatment plants; the issue is outside the scope of this EIR.

No additional analysis or change to the EIR conclusions regarding this topic is required.

Comment UT-3: Emergency Firefighting Water System

This response addresses the comments from the commenters listed below; each comment on this topic is quoted in full below this list.

- O-SPEAK-9
- I-Wuerfel-1

“WATER FOR CATASTROPHIC FIREFIGHTING

The Emergency Firefighting Water System (EFWS) aka the Auxiliary Water Supply System (AWSS) is an independent, high pressure, high volume water system specifically designed to fight catastrophic fires. It was brought into service in 1913.

From 1913 to 2010 it was under the jurisdiction of the SF Fire Department with engineering by DPW.

On May 10, 2010 it was transferred to the SFPUC by then Mayor Newsom as a means of balancing the City's budget.

Since being transferred to the SFPUC, the SFPUC has proposed a number of controversial strategies. The most controversial is to change EFWS/AWSS from a non-drinking water firefighting system to a drinking water based system.

Retired firefighters have voiced strong opposition to using drinking water for fighting catastrophic fires.

Below is an excerpt from their open letter to City officials.

"In the interest of public safety, [we must state that] it is completely irrational to assume that drinking water from municipal reservoirs will be adequate to reliably supply a high- pressure, high-volume hydrant system, like the Auxiliary Water Supply System, for fighting multiple simultaneous fires following a major Bay Area earthquake.... Based on our combined 2,000 years of professional firefighting experience, we must clearly state that the only

practical solution for supplying a citywide high-pressure hydrant system ... is to use the inexhaustible supply of saltwater that is readily available on three sides of the City.”

The value of a redundant water system dedicated to fighting catastrophic fires is echoed by the California Department of Emergency Services (CalOES) report from September 2018 titled State of California Hazard Mitigation Plan.

The EFWS/AWSS is specifically referenced in Annex 3.2.1 which identified these principles:

"In both the emergency [firefighting] water system and the transportation system, the importance of redundancy demonstrated. To ensure lifeline redundancy, the [emergency firefighting water] backup system should be independent."” (*Eileen Boken, Sunset-Parkside Education and Action Committee, July 11, 2022, [O-SPEAK-9]*)

“The Draft EIR fails to analyse the impacts on the water needed to protect the city from fires that will follow a major earthquake which is expected by the U.S Geological Survey to hit the Bay Area before 2043. These fires are a reasonably foreseeable impact that the EIR must consider and analyse how fires will be mitigated before enacting future implementation actions and development to increase housing.

The following facts about water use for firefighting have not been addressed:

- 1) San Francisco is a "retail customer" included in the Regional Water Supply System agreement.
- 2) San Francisco has approved the Water Shortage Allocation Plan (WSAP). This plan is to manage small shortfalls in water availability and may "call for retail customers to voluntarily ration" water (pg 4.9-18) "limiting rationing to no more than 20 percent on a system-side basis..."
- 3) Since all potable water to San Francisco is supplied by the Regional Water Supply System (RWSS) and is subject to the WSAP, the requirement to ration water by RWSS to retail customers will directly affect the initial source of water supplied to the SF Fire Department (SFFD) needed to suppress fires. This potable water is primarily accessed by the low-pressure hydrants throughout the city.
- 4) The backup source of firefighting water is from the independent high-pressure Auxiliary Water Supply System (AWSS) which uses non-potable water and seawater. The system was recently renamed the Emergency Firefighting Water System (EFWS).
- 5) The AWSS/EFWS does not provide firefighting water protection to all of San Francisco. It does not have high-pressure pipelines and hydrants to serve about half of the city. It does not have access to the unlimited seawater surrounding the city through pump stations on the westside or on the southeast side of the city that can immediately suppress fires. Every gallon of seawater saves a gallon of potable water, but this offset is not recorded.
- 6) Forecasted retail water demands used in the DEIR for 2020 through 2050 do not include all the potable water used by the SFFD because none of the firefighting water is either metered or billed. Therefore, the total impact of the Updated Housing Element on the need for more potable water cannot be recognized.

The DEIR cannot ignore the importance of preserving the housing that the new Element intends to build as well as preserving the housing already in existence. Supplying every neighborhood with access to low-pressure potable water connections and with high-pressure unlimited water pipeline connections and hydrants must be included in the Updated Housing Element, whether or not this water is metered.

The City has failed to conduct a comprehensive planning process that includes preservation of housing. The updated Element has a foreseeable direct impact which is not addressed. More housing requires more water resources that the Planning Department must make part of its plan. Even though it falls to the Public Utilities Commission to implement more water resources, the analysis of the Element's expansion of housing must include and be responsible for reporting on increased the need for water. Also, the SFFD's requirement for water should not be limited to the confines of the WASP." (*Nancy Wuerfel, July 16, 2022, [I-Wuerfel-1]*)

RESPONSE UT-3

The comments pertain to the Auxiliary Water Supply System, which has been renamed the Emergency Firefighting Water System, or EFWS. For background, the EFWS is the city's emergency water supply for firefighting purposes. It is a high-pressure water system with two pump stations, two storage tanks, one reservoir, and approximately 135 miles of pipelines. The system is independent of the domestic water supply and used solely for emergency firefighting. The EFWS uses primarily potable water; however, in emergency situations, the system can also draw water from San Francisco Bay and use saltwater for firefighting.²⁰ The system is maintained by the San Francisco Public Works EFWS Capital Project Team in collaboration with the SFFD and SFPUC.

With respect to public services, the proposed action would have a significant environmental effect if it would result in substantial adverse physical impacts associated with the provision of, or need for, new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, to maintain acceptable service ratios, response times, or other performance objectives for any public services, such as fire protection. The potential for the proposed action to result in reasonably foreseeable impacts related to fire protection services is analyzed under Impact PS-1 on draft EIR pp. 4.1-121 and 4.1-122 and in draft EIR Section 4.1, Effects Found Not to Be Significant. Similarly, with respect to utilities and service systems, the proposed action would have a significant water supply effect under CEQA if it would require or result in the construction of new or expanded water facilities or relocation of existing facilities, the construction or relocation of which could cause significant environmental effects, or have inadequate water supplies available to serve the proposed action and reasonably foreseeable future development during normal, dry, and multiple dry years. The potential for the proposed action to result in reasonably foreseeable impacts related to the provision of adequate water supplies and construction or operation of new or expanded water supply facilities is analyzed in draft EIR Section 4.9, Utilities and Service Systems, and further discussed in Response UT-1.

Overall, the amount of water used for firefighting in San Francisco is not a substantial portion of the city's overall water use. In the reporting year from July 2020 to June 2021, the SFPUC's water use from unbilled and

²⁰ San Francisco Fire Department, *Water Supply Systems*, 2022, <https://sf-fire.org/our-organization/division-support-services/water-supply-systems>, accessed August 29, 2022.

unmetered consumption, which includes firefighting, among other uses, was less than 1 percent of total water usage.²¹ In addition, the 2020 UWMP included projections for water losses, which account for unmetered and unbilled uses such as firefighting. Projections specific to firefighting are not available, but more information about water losses is provided in Section 4.1.3 of the 2020 UWMP.²² The draft EIR's analysis of future water supply and demand is based on the 2020 UWMP, as stated on p. 4.9-13 in draft EIR Section 4.9; thus, forecast water demands in the draft EIR do account for anticipated water demand for firefighting. Also, using non-potable water for firefighting as opposed to potable water would not affect the water supply for the anticipated development, as described above. Finally, to clarify the information in one comment, San Francisco is not a retail customer for the Regional Water Supply System agreement.

The proposed action would not affect implementation of current or future projects related to maintaining or improving the water supply for firefighting. Future projects consistent with the housing element update would not affect the availability of water for firefighting because SFPUC would not impose mandatory reductions on fire service accounts or fire hydrant use during fire emergencies, even during water shortage emergencies.²³ In other words, rationing would not be implemented for firefighting, even if the water demand generated by residential uses increases in the future. Thus, although potential impacts on the EFWS were not specifically discussed in the draft EIR, this use is accounted for in the EIR's conclusions. In addition, the city is undergoing multiple efforts to improve and expand the EFWS, as follows:^{24,25}

- SFPUC is implementing phase 1 of the Westside EFWS, which will bring high-pressure EFWS pipelines to the west side of the city. This phase of the project is anticipated to be completed in 2029. Phase 2 of the Westside EFWS, which is part of a citywide proposal discussed below, will bring additional pipelines to the northwest portion of the city. The timeline for phase 2 of the Westside EFWS has not yet been determined. Combined, phases 1 and 2 will include approximately 9 miles of pipelines and two water sources. More information about the EFWS is available at <https://sfpuc.org/about-us/our-systems/emergency-firefighting-water-system>.
- SFPUC and the SFFD developed a citywide proposal for EFWS pipelines and water sources; the proposal was submitted to the board of supervisors in late 2021. This project will expand the EFWS throughout most of the city. In some areas, existing EFWS infrastructure will be supplemented. In other areas, the system will be expanded to cover areas that currently do not have EFWS pipelines.
- On July 26, 2022, the board of supervisors directed the Office of Resilience and Capital Planning to create a financing plan by December 31, 2022, for expanding the EFWS to unprotected areas of the city. More information about the resolution is available at <https://sfgov.legistar.com/LegislationDetail.aspx?ID=5742704&GUID=CBB980AD-6797-4940-92CE-44362F4222C7&Options=ID%7cText%7c&Search=emergency+firefighting+water+system>.

²¹ San Francisco Public Utilities Commission, *FY 2020–2021 Water Audit Data Report*, 2022, <https://sfpuc.org/sites/default/files/about-us/policies-reports/ACFR FY2021 SFPUC.pdf>, accessed August 30, 2022.

²² Email from John Scarpulla (SFPUC) to Ryan Shum (SF Planning). Subject: Housing Element - PUC Discussion re AWSS. August 29, 2022.

²³ Email from John Scarpulla (SFPUC) to Ryan Shum (SF Planning). Subject: Housing Element – RTC Assistance. August 11, 2022.

²⁴ Ibid.

²⁵ Email from John Scarpulla (SFPUC) to Ryan Shum (SF Planning). Subject: Housing Element – PUC Discussion re AWSS. August 29, 2022.

No additional analysis or change to the EIR conclusions regarding this topic is required.

J. Alternatives

The comments and corresponding responses in this section cover topics in draft EIR Chapter 6, Alternatives. These include topics related to:

- ALT-1: Range of Alternatives
- ALT-2: Preservation Alternative
- ALT-3: Project Objectives
- ALT-4: Environmentally Superior Alternative
- ALT-5: No Project Alternative

Comment ALT-1: Range of Alternatives

This response addresses the comments from the commenters listed below. Out of the 50 individual comments, 22 comments are unique and therefore quoted in full below this list. Where the same comment is made by a number of individuals, the text is provided verbatim but not repeated multiple times. The names of the individuals who made the same comment are provided following the comment. Complete letters, emails, and the transcript are provided in full in Attachments 1 and 2 of this RTC document.

- | | | |
|--------------|----------------------|-----------------|
| • O-CCLT-2 | • I-Bratun-Glennon-5 | • I-Marks_2-5 |
| • O-CCLT-4 | • I-Britamon-1 | • I-Marks-3 |
| • O-LHIA-1 | • I-Burns-5 | • I-Martin-5 |
| • O-LHIA-6 | • I-Chintala-5 | • I-Mathews-5 |
| • O-LHIA-8 | • I-Chong,L-5 | • I-Miller-5 |
| • O-RDR-2 | • I-Chong,RB-5 | • I-O'Neill-5 |
| • O-REP-2 | • I-Conner-1 | • I-Paul,J_3-5 |
| • O-REP-5 | • I-Eisler,J-5 | • I-Paul,M_2-5 |
| • O-REP_2-1 | • I-Eisler,M-5 | • I-Pressman-5 |
| • O-REP_2-2 | • I-Elmendorf-3 | • I-Resnansky-4 |
| • O-REP_3-1 | • I-Esfandiari-1 | • I-Rogers-1 |
| • O-REP_3-10 | • I-Hart-5 | • I-Rose-1 |

- | | | |
|--------------|---------------|--------------------|
| • O-SOMCAN-2 | • I-Howell-5 | • I-Schwartz-1 |
| • O-YCD-3 | • I-Johnson-1 | • I-Simmons-1 |
| • I-Arora-5 | • I-Kind-5 | • I-Titus-5 |
| • I-Ayers-1 | • I-Klenk-1 | • I-Yovanopoulos-1 |
| • I-Besmer-1 | • I-Madsen-5 | |

“REP and we envision and work for San Francisco that empowers historically marginalized communities, BIPOC, immigrant, low-income, and no income resident seniors and people with disabilities to determine their future.

The DEIR makes multiple references to planning intention of having this be San Francisco's first Housing Element that embraces racial and social equity; however, the DEIR is deficient because it fails to study a project alternative that centers and prioritizes race and social equity.” (*Bruce Wolfe, Cares Community Land Trust, June 9, 2022, [O-CCLT-2]*)

“This DEIR is deficient in that it grossly underestimates the environmental policies that will be caused by policies recommended by this Housing Element.

By not truly centering the housing element on racial and social equity, this Housing Element will cause displacement on a scale that makes redevelopment and urban renewal look quaint.

The DEIR must study an alternative and prioritize this building for affordable housing first eliminate [indiscernible] -- and ensures that our public lands are developed for affordable housing, support housing, community services, [indiscernible]” (*Bruce Wolfe, Cares Community Land Trust, June 9, 2022, [O-CCLT-4]*)

“The Draft EIR fails to analyze a reasonable range of alternatives to the proposed project...” (*Kathy Devincenzi, July 12, 2022, [O-LHIA-1]*)

“The EIR Fails to Analyze the Reasonable Alternative of Encouraging Development and Increases in Height Limits Within One Quarter Mile of Transit Corridors.

In 2003, the San Francisco Planning Department released the attached map of residential lots within 1,250 feet of transit and commercial lots (“quarter-mile map”). Policy 11.6 of the 2004 San Francisco Housing Element encouraged “maximizing the opportunity for housing near transit.” (See attached excerpts) In the 2014 San Francisco Housing Element, Policy 1.10 supported “new housing projects... where households can easily rely on public transportation” and Policy 13.3 promoted housing “within an easy walk of’ transit and services. (See attached excerpts)

Please analyze an alternative to the proposed action that would encourage residential development and increases in height limits within one quarter mile of the transit corridors and commercial lots depicted on the attached 2003 map. Such an alternative would be more equitable than the proposed project, which would encourage development within approximately one to two blocks of transit corridors and would cause those residential areas to bear a disproportionate share of the adverse impacts of the future growth. In contrast, a quarter-mile alternative would spread out the adverse impacts of the future growth, including the adverse impacts from noise, air contaminants, shadows and other adverse impacts, more equitably without disproportionately impacting the residential areas within about two blocks of the transit corridors.

The fact that the DEIR fails to include an alternative that would conform with the quarter-mile areas adjacent to transit corridors that were identified as areas to which growth would be directed in prior versions of the housing element is evidence that the range of alternatives analyzed in the DEIR is not reasonable. Further evidence that the range of alternatives analyzed in the DEIR is not reasonable is that the proposed housing element amendment would not encourage increased height limits in the wealthy neighborhoods, but would encourage increased height limits in middle and lower income neighborhoods.

Is it not true that under such a quarter-mile alternative, the adverse impacts of noise, shadows, and air contaminants would be smaller in the affected areas than under the more limited areas that would be affected by the proposed project? Please explain the foreseeable degree of difference in these impacts in the respective affected areas.” (*Kathy Devincenzi, Laurel Heights Improvement Association, July 12, 2022, [O-LHIA-6]*)

“The EIR Fails to Analyze a Reasonable Range of Alternatives Because it Fails to Analyze an Alternative Consisting of a Degree of Growth that Can Foreseeably be Supported with Adequate Water Supplies Without More than 20% Rationing.

As shown above, there is no substantial evidence that there will be enough water to supply the amount of new housing which the 2022 housing element update seeks to achieve. Please analyze an alternative that would construct an amount of new housing in San Francisco that could likely be served by foreseeable water supplies without more than 20% rationing.” (*Kathy Devincenzi, Laurel Heights Improvement Association, July 12, 2022, [O-LHIA-8]*)

“And the EIR must study an alternative that prioritizes building affordable housing first, eliminate strategies that displace, and make sure public lands are developed for affordable housing, community services, small businesses, and public open spaces.” (*Don Misumi, Richmond District Rising, June 9, 2022, [O-RDR-2]*)

“The DEIR makes multiple references to planning's intention of having this be San Francisco's first housing element that centers racial and social equity; however, the DEIR is deficient because it fails to study a project alternative that centers and prioritizes racial and social equity.” (*Joseph Smooke, Race and Equity in all Planning Coalition, June 9, 2022, [O-REP-2]*)

“The DEIR must study an alternative that prioritizes building affordable housing first on the many strategies that encourage displacement and ensure that our public lands are developed for affordable housing, supportive housing, community services, small businesses, and public open spaces.” (*Joseph Smooke, Race and Equity in all Planning Coalition, June 9, 2022, [O-REP-5]*)

“As many have already said this afternoon, the DEIR makes reference to a planning focus as having this housing element be the first to center racial and social equity; however, as many have mentioned, none of the project’s alternatives actually do so or move us there.” (*Jeantelle Laberinto, Race and Equity in all Planning Coalition, June 9, 2022, [O-REP_2-1]*)

“In studying the no project alternative, there is no mention of the fact that the current Housing Element has resulted in a wildly -- a wild overproduction of unaffordable market-rate housing and a staggering underproduction of affordable housing; however, there is mention of the fact that market-rate housing provides benefits to those in upper socioeconomic tiers but does not study an alternative that will materially benefit low-income and people-of-color communities.

The DEIR must study an alternative that prioritizes building affordable housing first, eliminate strategies that encourage displacement, respects and fulfills the goals of the cultural districts in San Francisco, and ensure that our public lands are developed for affordable housing, supportive housing, community services, small businesses, and public open spaces.” (*Jeantelle Laberinto, Race and Equity in all Planning Coalition, June 9, 2022, [O-REP_2-2]*)

“The Housing Element DEIR is deficient largely because it fails to study a viable Equity Alternative to the “Proposed Action” also called the “Proposed Project.” As an “Information Document” (Volume 1, p. 1-2) that is required by the California Environmental Quality Act (CEQA) to provide the public with a complete and thorough assessment of the proposed project and alternatives that could result in lesser environmental impacts, this DEIR, therefore, fails and is inadequate. Per the “Standards for Adequacy of an EIR” (Volume 1, p. 1-2) this DEIR also fails by not providing “decision makers with information that enables them to make a decision that intelligently takes account of environmental consequences.” By not presenting a viable Equity Alternative, Planning’s DEIR misleads policy makers into thinking that an Equity Alternative is not feasible.

REP-SF’s sole purpose is to work in a coordinated way with its three dozen member organizations, in conjunction with City policymakers and planners, toward greater racial, social and economic equity in land use and planning. REP-SF has commented extensively on every draft that Planning staff has presented of the Actions and Strategies for the Housing Element, including a written presentation of REP-SF’s recommendations for how the Housing Element could actually accomplish bold goals for racial and social equity. Instead of meaningfully incorporating these recommendations, and further consulting with REP-SF and other organizations in San Francisco that have

years of experience identifying the problems and innovating solutions for racial, social and economic equity, this DEIR simply gestures very briefly toward what it quickly dismisses as an infeasible Project Alternative called the "100 Percent Affordable Housing Alternative" (p. 6-235 of Volume II of the DEIR).

As described, Planning's "100 Percent Affordable Housing Alternative" would impose a moratorium on market rate housing until the "housing production targets for below moderate income households are met." Planning rejected this approach because it would not provide housing affordable for "middle-income households" and it would "be contrary to Government Code section 66300, the Housing Crisis Act, which prevents cities from implementing moratoria or similar restrictions on housing, such as limiting the number of land use approvals or permits, in most circumstances."

Fortunately, imposing a moratorium on market rate housing and building only 100% affordable housing projects is not the only way to achieve equity. It is imperative that we thoroughly explore and detail a viable Equity Alternative through a process that involves Planning staff, REP-SF, Planning's Equity Council, and other grassroots organizations that have racial, social and economic equity as their focus, working together to identify priorities and strategies that meaningfully and practically ensure that the outcomes of this housing element reverse San Francisco's history of over producing high-priced market rate housing and severely under producing housing that's affordable for households with low, moderate and middle incomes. There must be deliberate and large-scale strategies that shift the foundation of the Housing Element in order to reverse the imbalances caused by our past and present land use and housing policies.

Some of the policies and strategies that should be explored by an Equity Alternative could include, but would not be limited to:

1. Aggressive site acquisition and land banking of affordable housing development sites to secure a long term pipeline of 100% affordable housing developments;
2. Planning and MOHCD working together with community organizations to identify and prioritize these affordable housing development sites to ensure that these sites are in strategic and desirable locations as defined by community-based organizations, and to ensure that affordable housing is built in all parts of San Francisco. MOHCD's participation is necessary for 1) resource development to plan for sufficient funding to purchase, hold and develop these sites; 2) manage the processes for selecting nonprofit organizations to manage and develop these sites;
3. Update the City's density bonus programs so the projects that are eligible for greater heights and density are developments that are deed restricted for 100% affordable housing;
4. Further update the City's density bonus programs so market rate housing can only qualify for greater heights and density if they provide a large increase in the inclusionary (below market rate housing) requirement (more than is required by HOME-SF), and a requirement that the inclusionary units be provided at the site of the primary development;
5. Implement an aggressive program of acquiring and rehabilitating existing apartment buildings and Single Room Occupancy residential buildings (SROs) for middle, moderate and lower income households through what

is commonly known as the Small Sites Acquisition program, with sites identified and prioritized by community based organizations;

6. Create a working partnership between Planning and MOHCD to create and implement an affordable housing land use plan and resource allocation and commitment plan to ensure that both departments are working closely together to ensure that the city's affordable housing goals are clearly defined and sufficiently funded, and implemented expeditiously;

7. Commit to a process that engages Planning, Planning's Equity Council, MOHCD, the Housing Stability Oversight Board, REP-SF and CCHO to identify enough development sites to build sufficient affordable housing in every Supervisorial district to meet our affordable housing goals. Then, follow this site identification process with a rezoning plan that rezones these sites for increased density affordable housing. Accompanying this plan would be a resource commitment for site acquisition and predevelopment;

8. Put communities at the forefront of site selection, and prioritize community planning processes that build the leadership of low-income, immigrant, youth, and working class residents and address economic, racial, and social inequalities today and far into the future;

9. Invest in resources and programs that lead to greater land / property ownership for BIPOC, low-income and marginalized communities.

10. Define "affordable" so the prices of the affordable housing are truly affordable for households and communities most in need, as defined by those communities.

11. Develop a land use plan for adaptive re-use of public lands for 100% affordable housing, supportive housing, community services, accessible open spaces and small business opportunities, and restrict the re-use of public lands for these purposes;

12. Create a land use and resource allocation plan for enough supportive housing to house everyone who is currently without a home in San Francisco pursuant to Prop C;

13. Create an Equitable Development Data Tool similar to what New York City has developed in order to monitor progress toward our equity goals in a detailed and transparent way, and to provide publicly accessible information about what types of housing market rate developers are proposing to build, and what that housing is expected to cost;

14. Prohibit homes from being used for commercial purposes such as "short term rentals" or "intermediate length occupancies" which encourage displacement of existing residents and encourage escalation of housing costs.

15. Protect rent-controlled homes from demolition. In the event of the demolition of a rent-controlled building, the replacement units should not only be subject to our rent control ordinance but also, should be deed restricted to the income of previous tenants if they come up for sale." (*Joseph Smooke, Race and Equity in all Planning Coalition, July 12, 2022, [O-REP_3-1]*)

“However, we request to engage in a dialogue with Planning to shape this Equity Alternative together, and to start that process of developing the Equity Alternative as soon as possible, so we can develop a meaningful Equity Alternative together in a way that moves this Housing Element toward the racial and social equity goals that both Planning and REP-SF want to see without delaying the Housing Element process.” (*Joseph Smooke, Race & Equity in All Planning Coalition, July 12, 2022, [O-REP_3-10]*)

“The DEIR makes multiple references to planning’s intention of this being San Francisco’s first housing element that centers racial and social equity; however, the DEIR is deficient because it fails to study a project alternative that centers and prioritizes racial and social equity.

The EIR does not study any project alternatives that would have truly equitable outcomes. The DEIR must study a project alternative that prioritizes affordable housing development, respects and fulfills the goals of the nine cultural districts, and provides supportive affordable housing for those currently without homes.

This DEIR is deficient in that it grossly underestimates the environmental impacts that will be caused by the policies recommended by this housing element. The DEIR must study an alternative that prioritizes building affordable housing first, eliminates strategies that encourage displacement, ensures that our public lands are developed for affordable housing, supportive housing, community services, small businesses and public open space.” (*Angelica Cabande, SOMCAN, June 9, 2022, [O-SOMCAN-2]*)

“The DEIR must study an alternative that prioritizes building affordable housing first and eliminates strategies that discourage displacement.” (*Zach Weisenburger, Young Community Developers, June 9, 2022, [O-YCD-3]*)

“The Planning Commission must consider/develop other alternatives and scenarios for how the planned growth and development can be more evenly and equitably distributed throughout the city. Regardless of where they seek to increase the housing stock in the city, no residential side streets should have height limitations as great as 85 feet. This will irreparably damage the urban fabric of our city and the character of our neighborhoods.” (*Ann Arora, July 7, 2022, [I-Arora-5]*; the following commenters provided the same comment: *I-Bratun-Glennon-5, I-Burns-5, I-Chintala-5, I-Chong,L-5, I-Chong,RB-5, I-Eisler,J-5, I-Eisler,M-5, I-Hart-5, I-Howell-5, I-Kind-5, I-Madsen-5, I-Marks_2-5, I-Martin-5, I-Mathews-5 I-Miller-5, I-Paul,J_3-5, I-Paul,M_2-5, and I-Titus-5*)

“This Environmental Impact Report is an impact report for outdated housing targets. The report studies alternatives based on Mayor Lee’s 2017 goal of building five thousand units per year by 2050, but former Mayor Lee’s goal predates our RHNA and even predates the bill that outlined the parameters for calculating RHNA, that bill being Senator Wiener’s SB 828. It is difficult to overstate how different these goals are: our RHNA requires ten thousand units per year by 2030, not five thousand units per year by 2050.

While expedient, it is wrong to not study a lawful alternative. Our city is walking blind into the actual environmental effects of accommodating our housing targets, and our city risks blowing all of our affordable housing funding.

Please add an alternative that studies rezoning for over seventy thousand additional units, as our RHNA requires. It is negligent not to.” (*Charles Ayers, June 8, 2022, [I-Ayers-1]*; the following commenters provided the same comment: *I-Besmer-1, I-Conner-1, I-Esfandiari-1, I-Johnson-1, I-Klenk-1, I-Rogers-1, I-Rose-1, I-Schwartz-1, and I-Simmons-1*)

“I would like to understand better why we did not study higher growth alternatives as environmentally superior in the environmental impact report. From my perspective, it fails to recognize the statewide and regional environment benefits of higher growth alternatives.

The housing crisis we have in the bay area is also an environmental disaster. We have the highest share of super commuters in the nation due to this housing crisis.

And if we built less housing in SF, it means more CO2 emissions, more building and wild land urban-interface with fire risks and bulldozing of scenic vistas outside of SF, whereas building in SF means having public transit options and, efficient multifamily housing available.

So I would ask the commission and the staff preparing this report to please study the rezoning of over 80,000 additional units as our RHNA obligation requires from the perspective of [indiscernible due to poor connection].” (*Jonathan Britamon, June 9, 2022, [I-Britamon-1]*)

“Not one alternative in the DEIR meets this standard. The principal alternatives, like the preferred alternative, would accommodate only 50,000 above-baseline units by 2050, or roughly 20,000 by 2030. The most ambitious alternative (Plan Bay Area) is only about 1.75 times as capacious (6- 18).

Fortunately, the city does have “available resources” (Gov’t Code 65583(b)) to accommodate many more than 5000 units/year. For example, the city could concurrently adopt the Preferred Alternative, the Dispersed Growth Alternative, and the East Side Alternative, rather than treating them as mutually exclusive. This would provide the same or greater moving-to-opportunity benefits as the Preferred Alternative and generate more BMR units through the city’s inclusionary programs.³

It is imperative that the final EIR analyze alternatives that stack together the various rezoning scenarios. Without this, there is a real risk that the housing element update will go off the rails, as follows.” (*Christopher Elmendorf, May 10, 2022, [I-Elmendorf-3]*)

“While I believe we need additional housing stock, I would like to see alternatives and scenarios for how the planned growth and development can be more evenly and equitably distributed throughout the city. It would

also be helpful to assess how existing commercial space could potentially be re-imagined for a greener future that also enables more housing.” (*Laurie Marks, June 16, 2022, [I-Marks-3]*)

“There is no doubt that the Planning Commission will have to make tradeoffs to meet the city's housing goals. Increasing height limitations along California and Geary which border our small neighborhood, make sense - as all neighborhoods in the city need to participate/do their part. Drastically increasing height limitations on the residential side streets which is in fact completely adverse to the stated goals of the EIR do not. No residential side street should have an 85 foot height limit.

Please consider/develop other alternatives for how the planned growth and and development can be more evenly and equitably distributed throughout the city.” (*Shannon and Shawn O'Neill, July 10, 2022, [I-O'Neill-5]; the following commenter provided the same comment: I-Pressman-5*)

“I am strongly against this proposal and I urge you to develop alternative scenarios for how how planned growth and development can be equitably distributed throughout the city.” (*Kristin Resnansky, June 20, 2022, [I-Resnansky-4]*)

“Hello. This is Anastasia Yovanopoulos, a member of San Francisco tenants union, and we are a member organization of the race and equity in all planning coalition urging you to thoroughly evaluate the impacts of policies that encourage demolition, displacement, and private speculative development will have on our communities and the environment.

REP coalition envisions and works for San Francisco that empowers historically marginalized communities, BIPOC immigrants, low-income and no-income residents, seniors and people with disabilities to determine our futures.

The draft EIR references planning's intention to have housing element 22 be San Francisco's first that centers racial and social equity. Multiple times it says this, but it fails to study any project alternative that centers on and prioritizes racial and social equity or results in equitable outcomes.

All the project alternatives that have been studied are market-based strategies, and none proposed to build affordable housing first.” (*Anastasia Yovanopoulos, San Francisco Tenants Union, June 9, 2022, [I-Yovanopoulos-1]*)

RESPONSE ALT-1

The comments question if the EIR studied an adequate range of alternatives and request additional alternatives. The suggested alternatives include encouraging development within 0.25 mile of transit corridors; increasing height limits in “wealthy neighborhoods,” limiting housing units, based on available water supply; developing an

equity alternative; distributing development throughout the city; limiting building heights on residential side streets; evaluating more units; combining all or parts of the draft EIR alternatives together; and reusing commercial space.

Please refer to Response PD-1 for a discussion of the assumptions used to inform this program EIR, in accordance with CEQA Guidelines section 15168, and additional examples of possible distribution patterns of future development growth.

One comment suggests reusing existing commercial space for housing. Refer to Response PD-3 for a discussion of redeveloping vacant office space to create residential space as part of the housing element update.

Two comments express general concerns or opinions about aspects of the alternatives and the proposed action, based on their merits. Refer to Response GC (NON-CEQA)-2 for a discussion of the merits of the proposed action.

This response is organized as follows:

- CEQA Requirements for Alternatives
- Alternatives Selection Process
- Comparison of Commenters' Alternatives with Alternatives in the Draft EIR
- Conclusion

CEQA Requirements for Alternatives

CEQA Guidelines section 15126.6(a) provides that “An EIR shall describe a range of reasonable alternatives to the project, or location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives.” The alternatives need not meet all project objectives but should meet most of the basic project objectives. The CEQA Guidelines recognize that the range of conceivable alternatives to a proposed project is potentially vast and that an EIR need not consider every conceivable alternative to a project. However, it must include a reasonable range of potentially feasible alternatives, based on the “rule of reason,” that will foster informed decision-making and public participation (see CEQA Guidelines section 15126.6[a]).

The range of potential alternatives is limited to those that could feasibly attain most of the basic objectives of the proposed action while reducing the significant impacts. Among the factors considered for feasibility are site suitability, economic viability, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the project sponsor can reasonably acquire or have access to an alternative site (CEQA Guidelines section 15126.6[f][1]). As described below, the EIR provides a discussion and analysis of the selection process used to identify the range of alternatives analyzed in the EIR, in compliance with CEQA Guidelines section 15126.6.

The purpose of presenting a range of alternatives to a proposed project is to focus on those alternatives that are capable of reducing or eliminating the significant effects identified in an EIR, including the No Project Alternative

(CEQA Guidelines section 15126.6). The EIR for the housing element update meets this requirement. Please see below for more details.

Alternatives Selection Process

Draft EIR p. 6-4 in Chapter 6, Alternatives, describes the alternatives screening and selection process. The selection process identified alternatives—different strategies for meeting most of the policy objectives included in the updated housing element—that would lessen or avoid the significant impacts of the proposed action or further reduce already less-than-significant impacts. The alternative strategies were then reviewed for their feasibility. The potentially feasible strategies were then screened for their ability to meet most of the project objectives (except in the case of the No Project Alternative, which is not required to meet the project objectives). This process resulted in development of a reasonable range of project alternatives, as described and analyzed in the EIR and expanded upon below.

Alternatives Considered and Selected

Draft EIR Chapter 6, Alternatives, selects and studies four alternatives: the No Project Alternative (a requirement of CEQA), Eastside Alternative, Preservation Alternative, and Dispersed Growth Alternative.

Draft EIR Table 6-8, beginning on p. 6-138, in Chapter 6 summarizes the ability of the alternatives to meet the project objectives or five overarching goals of the housing element update. As described in draft EIR Chapter 2, Project Description, under “C. Project Objectives” on p. 2-11, the housing element update includes the following goals as objectives of the project. On draft EIR p. 2-11, the bullet under “C. Project Objectives” sub-header has been updated, consistent with the fourth draft of the housing element update (October 2022), as follows:

- Goal 1: Recognize the right to housing as a foundation for health, and social and economic well-being
- Goal 2: Repair the harms of historic racial and ethnic discrimination against American Indian, Black, and other people of color
- Goal 3: Foster racially and socially inclusive neighborhoods through equitable distribution of investment and growth
- Goal 4: Provide sufficient housing for existing residents and future generations for a city with diverse cultures, family structures, and abilities

The following summarizes the extent to which each of the four alternatives meets the project objectives,²⁶ as described in **draft EIR Table 6-8**, pp. 6-138 and 6-139:

- No Project Alternative – partially meets Goals 1, 2, and 3; does not meet Goal 4
- Eastside Alternative – fully meets Goal 4; partially meets Goals 1, 2, and 3

²⁶ A fifth project objective is not listed here because it does not relate to the location or amount of housing (Goal 5: Promote neighborhoods that are well connected, healthy, and rich with community culture). For that reason, the proposed action and all alternatives would meet this program objective to the same degree.

- Preservation Alternative – fully meets Goals 1 and 4; partially meets Goals 2 and 3
- Dispersed Growth Alternative – fully meets Goal 4; partially meets Goals 1, 2, and 3

These alternatives would lessen or, in some cases, avoid significant and unavoidable adverse impacts related to built-environment historic resources, transportation and circulation, air quality, noise and vibration, wind, and shadow. **Draft EIR Table 6-2**, beginning on p. 6-22, compares the environmental impacts of the alternatives to those of the proposed action. The Eastside Alternative would reduce impacts related to vehicle trips, such as air quality, noise, GHG, and transportation impacts. The Preservation Alternative would reduce impacts on built-environment historic resources. The Dispersed Growth Alternative would reduce impacts related to building heights, such as wind and shadow impacts. Decision makers can compare the environmental impact trade-offs among these alternatives and the proposed action.

The draft EIR also evaluates Plan Bay Area 2050. Although this alternative would not substantially lessen or avoid the impacts of the proposed action, the EIR evaluates Plan Bay Area 2050 at a program level to acknowledge and disclose the similarities and differences in environmental impacts between this regional plan's projections for San Francisco and the proposed action.

The alternatives provide a reasonable range of potentially feasible alternatives and provide enough variation to allow for informed decision making.

Alternatives Considered but Rejected

The draft EIR describes the alternatives considered but rejected, beginning on draft EIR p. 6-234. CEQA Guidelines section 15126.6(c) requires an EIR to identify alternatives that were considered by the lead agency during the scoping process but rejected. Section 15126.6(c) provides that among the factors that may be used to eliminate alternatives from detailed consideration are (1) failure to meet most of the basic project objectives, (2) infeasibility, or (3) inability to avoid significant environmental impacts. The department considered but rejected four alternatives: Transit Corridors Alternative, Full Preservation Alternative, Increased Demolition Alternative, and 100 Percent Affordable Housing Alternative. See draft EIR pp. 6-234 and 6-235, Chapter 6, Alternatives, for more information on why each of these alternatives was considered but rejected.

Please see below for a comparison of commenters' alternatives with alternatives in the draft EIR, including those selected and rejected, as applicable.

Comparison of Commenters' Alternatives with Alternatives in the Draft EIR

As discussed above, the commenters suggest that the EIR should analyze additional alternatives. This section compares the alternatives suggested by the commenters with the draft EIR alternatives and, if applicable, determines whether the suggested alternatives would meet the basic project objectives and reduce or eliminate any of the proposed action's significant environmental impacts.

Higher-Growth Alternatives

Some comments ask why the draft EIR did not study higher-growth alternatives. The draft EIR studied Plan Bay Area 2050 to acknowledge and disclose the similarities and differences in environmental impacts between this regional plan's projections for San Francisco, which suggest more growth, and the proposed action. Draft EIR p. 6-18 states that Plan Bay Area 2050 would include approximately 87,600 net new housing units and 6,600 net new jobs by 2050 compared with the 2050 environmental baseline. The proposed action would result in approximately 50,000 units and a similar number of jobs compared with the 2050 environmental baseline. Plan Bay Area 2050 would result in a less-than-significant impact from criteria air pollutants compared to the proposed action, which would result in a significant and unavoidable impact, even with mitigation. Plan Bay Area 2050 would increase the significant and unavoidable impacts on built-environment historic resources as well as construction-related transportation impacts. It would also increase impacts related to public transit delay; loading; noise, both construction and operational; the exposure of sensitive receptors to fine particulate matter and toxic air contaminants; shadow; and the water supply. See **draft EIR Table 6-2**, pp. 6-22 through 6-41, for a summary of the impacts from Plan Bay Area 2050. Plan Bay Area 2050's impact analysis begins on draft EIR p. 6-142.

Refer to Response PD-2 for a comparison of the RHNA and EIR projections, including Plan Bay Area 2050 projections. As discussed in Response PD-2, the draft EIR adequately considers the environmental impacts of the proposed action, a scenario that is reasonably foreseeable. For example, although the jurisdiction must show that suitable and available land for residential development exists to meet the RHNA, it is not required to physically construct the units. In addition, even if the draft EIR had studied impacts from the construction of units to meet specific RHNA targets, an analysis of the intensity of the environmental impacts would not add significant new information to the draft EIR, under CEQA Guidelines section 15088.5, or result in any new significant impact not already identified in the draft EIR or a substantial increase in the severity of an impact identified in the draft EIR prepared for the proposed action, as discussed in Response PD-2.

The draft EIR did not study an alternative that would concurrently adopt the "Preferred Alternative" (presumably the comment is referring to the proposed action), Eastside Alternative, and Dispersed Growth Alternative, as a commenter suggests. Adopting such an alternative is unnecessary because the proposed action would provide adequate housing for existing and future residents and meet the RHNA requirements of the state. Thus, the range of risks (e.g., loss of affordable housing funds) described in the comment (i.e., I-Elmendorf-4) is not anticipated to occur as a result of the housing element update. See Response GC (NON-CEQA)-4 for information related to the range of risks. In addition, such an alternative would be unlikely to reduce or eliminate any of the proposed action's significant environmental impacts. For example, the Eastside Alternative would reduce impacts related to vehicle trips. However, if this alternative is combined with the proposed action, the lessening of effects from vehicle trips would not occur. Therefore, analysis of this alternative is not required in the EIR.

Race and Equity in All Planning Coalition–Suggested Alternative

The comments also state that the draft EIR should study another alternative, with a focus on racial and social equity more than that of the proposed action.

The commenter suggests policies and strategies for the suggested alternative. As described in RTC Table 4-3, many of these policies and strategies are included in the housing element update. It is noted that the department modified the housing element update since receiving these comments due, in part, to these comments.

RTC Table 4-3. Race and Equity-Related Policies and Strategies

Race and Equity in All Planning Coalition– Recommended Policies and Strategies ¹	Housing Element Update ^{2,3}
<p>1. Aggressive site acquisition and land banking of affordable housing development sites to secure a long term pipeline of 100% affordable housing developments</p> <p>2. Planning and MOHCD working together with community organizations to identify and prioritize these affordable housing development sites to ensure that these sites are in strategic and desirable locations as defined by community-based organizations, and to ensure that affordable housing is built in all parts of San Francisco. MOHCD's participation is necessary for 1) resource development to plan for sufficient funding to purchase, hold and develop these sites; 2) manage the processes for selecting nonprofit organizations to manage and develop these sites</p> <p>7. Commit to a process that engages Planning, Planning's Equity Council, MOHCD, the Housing Stability Oversight Board, REP-SF and CCHO to identify enough development sites to build sufficient affordable housing in every Supervisorial district to meet our affordable housing goals. Then, follow this site identification process with a rezoning plan that rezones these sites for increased density affordable housing. Accompanying this plan would be a resource commitment for site acquisition and predevelopment</p> <p>8. Put communities at the forefront of site selection, and prioritize community planning processes that build the leadership of low-income, immigrant, youth, and working class residents and address economic, racial, and social inequalities today and far into the future</p> <p>11. Develop a land use plan for adaptive re-use of public lands for 100% affordable housing, supportive housing, community services, accessible open spaces and small business opportunities, and restrict the re-use of public lands for these purposes</p>	<p>Policy 13: Amplify and prioritize voices of American Indian, Black, and other people of color, and other disadvantaged communities, and embrace the guidance of their leaders throughout the engagement and planning processes for housing policy, planning, programs, and developments. (and actions a to f associated with this policy)</p> <p>Policy 19, action c: Create a funded land banking program to purchase either individual lots or lots for consolidation that could accommodate at least 50 units on sites in Well-resourced Neighborhoods, such as sites owned by religious institutions, parking on public land, or underutilized sites. (Planning, MOHCD, Mayor/BOS; Medium)</p> <p>Policy 22, action a: Convene City leadership, staff, policymakers, affordable housing advocates, and industry experts to collaborate on an Affordable Housing Implementation and Funding Strategy that provides specific recommendations and responsible parties to achieve and sustain the substantial public funding, that would join with public-private partnerships, needed to support the RHNA targets of over 46,000 moderate and low-income units. Complete this effort by January 31, 2024. (Planning, MOHCD, Mayor/BOS; Short)</p> <p>Policy 22, action I: Develop land acquisition process and program that permits inexpensive long-term leases for land developed with high affordability. (Planning, Mayor/BOS; Medium)</p> <p>Policy 24, action f: Expand the Public Sites for Housing Program through public-private partnerships and utilize City resources to support the maximum number of permanently affordable housing units on underutilized publicly owned and surplus sites, balancing the financial needs of enterprise agencies, and ensuring adequate space and resources to address the gaps in community infrastructure, services and amenities. (Planning, OEWD, MOHCD; Long)</p>

Race and Equity in All Planning Coalition– Recommended Policies and Strategies ¹	Housing Element Update ^{2,3}
<p>3. Update the City's density bonus programs so the projects that are eligible for greater heights and density are developments that are deed restricted for 100% affordable housing</p> <p>4. Further update the City's density bonus programs so market rate housing can only qualify for greater heights and density if they provide a large increase in the inclusionary (below market rate housing) requirement (more than is required by HOME-SF), and a requirement that the inclusionary units be provided at the site of the primary development</p>	<p>Policy 24, action j: Incentivize development projects to exceed the required inclusionary percentages to maximize the total number of Below Market Rate units via density bonus programs or regulatory paths through streamlined approved as defined in Policy 25. (Planning; Short)</p>
<p>5. Implement an aggressive program of acquiring and rehabilitating existing apartment buildings and Single Room Occupancy residential buildings (SROs) for middle, moderate and lower income households through what is commonly known as the Small Sites Acquisition program, with sites identified and prioritized by community based organizations</p>	<p>Policy 2, action f: Identify SRO residential hotels in advanced states of disrepair where demolition and construction of new Permanent Supportive Housing may be more cost-effective than rehabilitation and requiring tenant relocation plans during construction and a right to return for tenants. (DBI, HSH, Planning; Medium)</p> <p>Policy 3, action a: Prioritize building purchases for the acquisition and rehabilitation program that serve extremely- and very-low income and unhoused populations including purchase of SRO residential hotels. (MOHCD, DBI; Medium)</p>
<p>6. Create a working partnership between Planning and MOHCD to create and implement an affordable housing land use plan and resource allocation and commitment plan to ensure that both departments are working closely together to ensure that the city's affordable housing goals are clearly defined and sufficiently funded, and implemented expeditiously</p>	<p>Policy 14, action b: Identify and fund liaisons within key City agencies such as MOHCD and Planning to support the housing needs and priorities of American Indian, Black, and other people of color, and other disadvantaged communities; such liaisons should provide regular check-ins with the community at centralized community spaces and reporting on Housing Element Implementation Program progress. (Planning, MOHCD; Short)</p> <p>Policy 14, action d: Establish an inter-agency Housing Element implementation committee, who convenes meetings with community advisor members representing racial and social equity-focused bodies as cited in Policy 14, action (c), to inform the City's budget and work program on housing equity. The committee would be responsible for reporting progress measured in actions (a) and (c) to the Planning Commission and Mayor's Office and for identifying financial or legal challenges to progress. (Planning, MOHCD, HRC; Short)</p> <p>Policy 14, action e: Monitor and shape housing investments, including permanently affordable housing production, preservation, and housing services, through the Capital Planning process cited in Policy 22, action (d) so that resource allocation is accountable to the community priority actions identified in Policy 14, action (c). (Planning, MOHCD; Short)</p>

Race and Equity in All Planning Coalition– Recommended Policies and Strategies ¹	Housing Element Update ^{2,3}
	<p>Policy 22, action a: Convene City leadership, staff, policymakers, affordable housing advocates, and industry experts to collaborate on an Affordable Housing Implementation and Funding Strategy that provides specific recommendations and responsible parties to achieve and sustain the substantial public funding, that would join with public-private partnerships, needed to support the RHNA targets of over 46,000 moderate and low-income units. Complete this effort by January 31, 2024. (Planning, MOHCD, Mayor/BOS; Short)</p>
<p>9. Invest in resources and programs that lead to greater land / property ownership for BIPOC, low-income and marginalized communities</p>	<p>Policy 5: Improve access to the available Affordable Rental and Homeownership units especially for disproportionately underserved racial and social groups. (and actions a to l associated with this policy)</p> <p>Policy 11: Establish and sustain homeownership programs and expand affordable housing access for American Indian, Black, Japanese, Filipino, and other communities to redress harm directly caused by past discriminatory government actions including redlining, urban renewal, the Indian Relocation Act, or WWII Japanese incarceration.</p> <p>Policy 12: Invest in and expand access to cultural anchors, land, and spaces that are significant to American Indian, Black, Japanese, Filipino, and other communities directly harmed by past discriminatory government actions including redlining, urban renewal, the Indian Relocation Act or WWII Japanese incarceration to redress histories of dispossession, social disruption, and physical displacement. (and actions a to d)</p>
<p>10. Define "affordable" so the prices of the affordable housing are truly affordable for households and communities most in need, as defined by those communities</p>	<p>Not included. Affordable housing is already defined by the city as housing that is either rented or owned at prices affordable to households with low to moderate incomes. The United States Department of Housing and Urban Development (HUD) determines the thresholds by household size for these incomes for the San Francisco HUD Metro Fair Market Rent Area (HMFA). Permanently affordable housing means housing, regardless of ownership, for which there is a legally binding, recorded document in effect that limits the price at which the owner may sell or restricts the occupancy of the unit to a qualified, low-income household, in perpetuity.</p>

Race and Equity in All Planning Coalition– Recommended Policies and Strategies ¹	Housing Element Update ^{2,3}
<p>12. Create a land use and resource allocation plan for enough supportive housing to house everyone who is currently without a home in San Francisco pursuant to Prop C</p>	<p>Policy 6, action a: Identify and implement strategies to increase placement in Permanent Supportive Housing through the Coordinated Entry assessment for racial and social groups who are overrepresented in the unhoused population, such as extremely and very-low income American Indian, Black, and Latino(a/e) people, transgender people, or people with prior involvement in the criminal justice system. (HSH, MOHCD; Short)</p> <p>Policy 6, action d: Study and remove barriers to entry for temporary shelters, transitional and Permanent Supportive Housing for unhoused individuals and families, particularly for individuals with mental health or substance abuse issues, and prior involvement with the criminal justice system. (HSH, DPH, APD; Medium)</p> <p>Policy 8: Expand permanently supportive housing and services for individuals and families experiencing homelessness as a primary part of a comprehensive strategy to eliminate homelessness. (and actions a through n associated with this policy)</p> <p>Policy 22, action a: Convene City leadership, staff, policymakers, affordable housing advocates, and industry experts to collaborate on an Affordable Housing Implementation and Funding Strategy that provides specific recommendations and responsible parties to achieve and sustain the substantial public funding, that would join with public-private partnerships, needed to support the RHNA targets of over 46,000 moderate and low-income units. Complete this effort by January 31, 2024. (Planning, MOHCD, Mayor/BOS; Short)</p>
<p>13. Create an Equitable Development Data Tool similar to what New York City has developed in order to monitor progress toward our equity goals in a detailed and transparent way, and to provide publicly accessible information about what types of housing market rate developers are proposing to build, and what that housing is expected to cost</p>	<p>Policy 10, action g: Incorporate findings from the studies called for in Policy 10, actions (a) through (e), including the resulting disparities and inequities, when applying the Planning Department’s racial and social equity assessment tool to applicable projects. (Planning; Short)</p> <p>Policy 14, action a: Develop and align citywide metrics that measure progress towards beneficial outcomes for American Indian, Black, and other people of color, and other disadvantaged communities resulting from housing policies using methods consistent with the San Francisco Equity Index prepared by the Office of Racial Equity. (Planning, ORE; Medium)</p>
<p>14. Prohibit homes from being used for commercial purposes such as "short term rentals" or "intermediate length occupancies" which encourage displacement of existing residents and encourage escalation of housing costs</p>	<p>Policy 36: Maximize the use of existing housing stock for residential use by discouraging vacancy, short-term use, and speculative resale. (and actions a to c associated with this policy)</p>

Race and Equity in All Planning Coalition– Recommended Policies and Strategies ¹	Housing Element Update ^{2,3}
15. Protect rent-controlled homes from demolition. In the event of the demolition of a rent-controlled building, the replacement units should not only be subject to our rent control ordinance but also, should be deed restricted to the income of previous tenants if they come up for sale.	Policy 25, action a: Establish local ministerial approval for housing applications in Well-resourced Neighborhoods outside of areas vulnerable to displacement that net two or more housing units, do not demolish existing rent-controlled units, and meet tenant protection and relocation standards as recognized in the Housing Crisis Act of 2019, by Board of Supervisors or voter approval of a City Charter amendment or by Board decision to include more project types if or when a non-charter change pathway is available. (Planning, Mayor/BOS; Short) (similar actions are in Policy 26, actions I, j, and l)
Respects and fulfills the goals of the nine cultural districts [no number, repeated in a few comments though]	<p>Policy 12, action c: Strengthen interagency coordination to ensure that Cultural District strategies related to the creation or improvement of cultural anchors and spaces are integrated into planning, funding, and construction and/or rehabilitation of public projects (e.g., parks and open spaces, street improvements, libraries, and transit facilities). (Planning, MOHCD, OEWD; Short)</p> <p>Policy 12, action d: Fund the development and implementation of community-led strategies in Cultural Districts to retain and grow culturally associated businesses and services that attract residents back to the area. (MOHCD, OEWD, OSB, Planning; Short)</p> <p>(other cultural district actions include Policy 13, action b; Policy 14, action c; Policy 18 actions a and b; Policy 37, actions b, c, and l; Policy 4, action d; and Policy 42, actions and b)</p>

Notes:

1. Policies and strategies numbering, if applicable, reflects letter from Joseph Smooke, Race and Equity in all Planning Coalition, July 12, 2022, [O-REP_3-1].
2. It is noted that the department modified the housing element update since receiving these comments and, in part, because of these comments. The corresponding list of policies and actions is not intended to be comprehensive of all relevant ones responding to these comments from draft 4 of the housing element update, October 2022.
3. Parenthesis refer to agencies responsible for action, and timeframe for action initiation of Short (0 to 2 years), Medium (3 to 5 years), Long (6 to 8 years), and Ongoing. Please refer to draft 4 of the housing element update, October 6, 2022 for other details.

Some policies and strategies suggested by commenters could be inconsistent with state housing element law. For example, state law (Government Code section 65584[a][2]) intends for cities and counties to accommodate, at a minimum, the amount of housing in the RHNA. There is no concept of “overproduction” of housing by income group in state housing element law. In addition, Government Code section 65584.04(g)(2) states that the past underproduction of housing by income group cannot be a factor in the current RHNA allocation for a city. This precludes a reduction in above-moderate units, based on the past underproduction of low- and moderate-income housing. Thus, such policies and strategies may preclude HCD from certifying the housing element update as consistent with state law and/or preclude the housing element update from meeting basic project objectives through the loss of state funding for affordable housing, among other items.

As stated, in many ways the housing element update is consistent with the policies and strategies included in this suggested alternative. To the extent the commenters seek policy changes, some changes may not meet the basic project objectives. Thus, the commenter's alternative is not considered further for the purposes of CEQA.

For informational purposes, policy changes that would further enhance housing affordability would most likely not affect the draft EIR's impact conclusions. The draft EIR studied the reasonably foreseeable indirect physical effects on the environment from the goals, policies, and actions of the housing element update. The draft EIR generally does not distinguish indirect environmental impacts, based on the income status of the occupants of future housing development. For example, the draft EIR studies the indirect environmental impacts of future housing development building envelopes (e.g., bulk and width) or the construction of multiple buildings at one time, regardless of whether those buildings are 100 percent affordable or not.

One area where increased affordability in future housing developments could reduce impacts is related to vehicle trips and the resultant impacts on air quality, noise, GHG emissions, and transportation. The draft EIR uses the SF-CHAMP model to estimate the vehicle trip outputs used for the aforementioned topics. One output is vehicle miles traveled (VMT). SF-CHAMP accounts for demographics in estimating VMT (refer to draft EIR p. 4.4-65 for a description of SF-CHAMP). Households with lower income levels have lower levels of VMT. Specifically, households with income levels that do not exceed 80 percent and 50 percent of the area median income have approximately 10 percent and 15 percent, respectively, less VMT, as estimated by SF-CHAMP.^{27,28} However, it is unlikely that such an alternative would reduce the significant and unavoidable vehicle-trip related impacts of the proposed action to less than significant, assuming that future development with increased affordability would occur in locations similar to those under the proposed action for the reasons outlined below.

- Transportation (transit delay). Vehicle trips would have to be substantially reduced to reduce the impacts to less-than-significant levels, especially on the Geary Boulevard corridor. It is unlikely that this would occur with increased affordability in future housing developments. For example, a substantial transit delay could occur along the Geary Corridor if the proposed action increases transit travel times by 50 seconds or more. The proposed action would increase transit travel times along this corridor by up to 2 minutes, 41 seconds, or approximately 222 percent higher than the threshold of significance. Thus, a 10 to 15 percent decrease in vehicle trips (the reduction that could be achieved from increased affordability) would be unlikely to reduce the impact to less-than-significant levels. In addition, to the extent that vehicle trips are replaced with transit trips, the transit trips also would create delays for passenger boarding and alighting. Therefore, transit delay conclusions would be similar to those for the proposed action.
- Transportation (loading). Similar to the proposed action, providing onsite and/or on-street curb loading spaces to accommodate the new loading demand may not be feasible for future housing developments with

²⁷ This is based on research documented in San Francisco Planning Department, *Transportation Demand Management, Technical Justification*, updated January 22, 2018, p. 30, https://default.sfplanning.org/transportation/tdm/TDM_Technical_Justification_update2018.pdf, accessed October 24, 2022

²⁸ Please note that the department typically does not factor in site-specific transportation demand management measures, such as the level of onsite affordability, in calculating travel demand estimates for individual development projects. However, the department may consider including site-specific transportation demand management measures on a project-by-project basis.

increased affordability. Likewise, future development projects with increased affordability could disrupt circulation and create potentially hazardous conditions, just like future development anticipated under the proposed action, regardless of the percent reduction in VMT from increased affordability. Therefore, the loading impact conclusions would be similar to those of the proposed action.

- **Operational Noise (traffic):** Vehicle trips would have to be substantially reduced to reduce the impacts to less-than-significant levels. It is unlikely this would occur with increased affordability in future housing developments. For example, as explained on draft EIR p. 4.5-29, a significant vehicle-generated noise impact would occur with (1) an increase of 3 dBA²⁹ or more where the noise environment is “conditionally acceptable,” “conditionally unacceptable,” or “unacceptable,” based on the land use compatibility chart (draft EIR Table 4.5-8, p. 4.5-24), because such areas are already exposed to higher-than-desired noise levels, or (2) an increase of 5 dBA everywhere else because a 5 dBA increase in the noise level is readily noticeable. Under the proposed action, impacts are anticipated in the Ingleside, Inner Sunset, Outer Sunset, and Richmond planning districts, with the greatest increase in the traffic noise occurring in the Inner Sunset planning district (i.e., a predicted increase of up to 21.1 dBA L_{dn}).³⁰ Thus, a 10 to 15 percent decrease in the number of vehicle trips (the reduction that could be achieved from increased affordability) would be unlikely to reduce the impact to less-than-significant levels. Therefore, the operational noise impact conclusions would be similar to those of the proposed action.
- **Criteria Air Pollutants:** VMT would have to be substantially reduced to reduce the impacts to less-than-significant levels. It is unlikely that this would occur with increased affordability in future housing developments. As explained on draft EIR p. 4.6-45, the growth in citywide VMT in 2050 with the proposed action, 6.4 percent, would be greater than the service population growth in 2050, 5.4 percent. Specifically, as identified in draft EIR Table 4.6-6, total citywide VMT would be 12,361,000 under the proposed action and 11,617,000 under the 2050 environmental baseline, a difference of 744,000. Hypothetically, the 744,000 could be reduced by 10 to 15 percent from households with income levels that do not exceed 50 to 80 percent of the area median income if the proposed action were to increase affordability to those levels, which is an unlikely scenario. A 10 to 15 percent reduction would result in an approximately 5.7 to 5.4 percent increase, respectively, in citywide VMT under the proposed action compared with the 2050 environmental baseline. These amounts would be just at or slightly above service population growth and unlikely to reduce the impact to less-than-significant levels. Therefore, the criteria air pollutant impact conclusions would be similar to those of the proposed action.

The points raised in this comment regarding studying the Race and Equity in All Planning Coalition–Suggested Alternative do not affect the adequacy of the range of alternatives provided in the EIR. Regardless, decision makers may consider policy changes that align with the commenters’ proposals to the extent they are different

²⁹ A-weighted decibel (dBA): An overall frequency-weighted sound level in decibels that approximates the frequency response of the human ear. The dBA scale is the most widely used for environmental noise assessments.

³⁰ Day-night level (L_{dn}): The energy average of the A-weighted sound levels occurring during a 24-hour period, with a 10 decibel penalty added to sound levels between 10 p.m. and 7 a.m.

from the housing element update. Any physical effects on the environment resulting from revisions to housing element update policies that are not addressed in the EIR would require future evaluation, as applicable.

Refer to Response ENS-3 for a discussion of the less-than-significant impacts related to displacement under the proposed action.

Evenly Distributed Growth Alternative, 85-foot Height Limit on Residential Streets Alternative, and Quarter-mile Transit Corridors Alternative

Comments suggest the following alternatives:

- An alternative where future housing development is distributed more evenly and equitably throughout the city, with the potential for converting existing commercial spaces into housing. The department assumes that these comments are suggesting that the draft EIR's projected level and distribution of housing growth, based on modeling conducted by the department, are not evenly distributed or equitable.
- An alternative that encourages residential development and increases in height limits within 0.25 mile of the transit corridors and commercial lots depicted on a map that the department released in 2003. That map shows several transit corridors and commercial lots throughout San Francisco.
- An alternative in which residential side streets have a height limit of less than 85 feet. It is presumed that these comments are referring to streets that are located in RH (Residential, House) districts.

Regarding the even distribution of growth as well as growth near transit corridors and commercial lots, as stated on draft EIR p. 2-29, compared with development anticipated under the existing 2014 housing element by 2050, the housing element update would increase housing production and shift a greater share of anticipated growth from the east side of the city to well-resourced areas along transit corridors and low-density areas, which are located primarily on the west and north sides of the city, to arrive at 150,000 units. It is assumed that some of this new housing would also be on commercial lots and other lots throughout the city. As described in draft EIR Appendix C, the approximately 150,000 housing units for the proposed action consist primarily of 1) the approximately 50 percent of the housing units in the department's current development pipeline or in other reasonably foreseeable projects, 2) the approximately 40 percent of the housing units in well-resourced areas, and 3) the approximately 10 percent of the remaining housing units in various locations throughout the city.

The Appendix A table in draft EIR Appendix C displays the distribution of housing growth throughout the city for 2020, 2050 Baseline (existing 2014 housing element), 2050 Housing Element 2022 Update, 2050 Preservation Alternative, 2050 Eastside Alternative, 2050 Dispersed Growth, and 2050 Plan Bay Area. To further illustrate the distribution of growth through the city studied in the draft EIR, the Appendix A table has been revised to indicate what percent of each planning district is considered a well-resourced area. The revised Appendix A table is provided on the following page.

Appendix A: Total Housing Units by Planning District by Land Use Pattern

Planning Districts	% of District in well-resourced area ²	2050 Housing Element 2022													
		2020		2050 Baseline		Update		2050 Preservation		2050 Eastside ¹		2050 Dispersed Growth ¹		2050 Plan Bay Area 2050	
		Total Units	% of Total	Total Units	% of Total	Total Units	% of Total	Total Units	% of Total	Total Units	% of Total	Total Units	% of Total	Total Units	% of Total
Bernal Heights	<u>0%</u>	9,875	2.4%	10,136	2.0%	9,919	1.8%	9,919	1.8%	10,081	1.8%	10,608	1.9%	11,106	1.9%
Buena Vista	<u>91%</u>	16,921	4.2%	18,253	3.6%	19,830	3.5%	19,819	3.5%	18,438	3.3%	18,551	3.3%	22,618	3.8%
Central	<u>71%</u>	25,544	6.3%	25,782	5.1%	28,716	5.1%	30,744	5.5%	25,999	4.6%	29,548	5.3%	30,510	5.1%
Downtown	<u>0%</u>	37,453	9.2%	44,450	8.7%	42,685	7.6%	42,685	7.6%	55,967	10.0%	48,056	8.6%	52,103	8.7%
Golden Gate Park	<u>0%</u>	0	0.0%	0	0.0%	0	0.0%	0	0%	0	0.0%	0	0.0%	0	0.0%
Ingleside	<u>40%</u>	27,220	6.7%	40,285	7.9%	47,079	8.4%	45,952	8.2%	38,838	6.9%	45,735	8.1%	41,867	7.0%
Inner Sunset	<u>100%</u>	18,421	4.5%	18,973	3.7%	29,995	5.4%	30,318	5.4%	18,813	3.3%	22,861	4.1%	22,243	3.7%
Marina	<u>100%</u>	25,089	6.2%	25,401	5.0%	29,594	5.3%	29,161	5.2%	30,746	5.5%	26,412	4.7%	29,441	4.9%
Mission	<u>0%</u>	27,546	6.8%	37,682	7.4%	36,419	6.5%	36,419	6.5%	45,046	8.0%	39,668	7.1%	46,913	7.9%
Northeast	<u>44%</u>	38,438	9.4%	39,089	7.7%	39,762	7.1%	40,837	7.3%	41,238	7.3%	39,530	7.0%	51,002	8.6%
Outer Sunset	<u>100%</u>	27,012	6.6%	27,962	5.5%	42,305	7.6%	42,645	7.6%	27,396	4.9%	38,974	6.9%	31,612	5.3%
Presidio	<u>0%</u>	1,214	0.3%	1,215	0.2%	1,214	0.2%	1,214	0.2%	1,237	0.2%	1,276	0.2%	1,214	0.2%
Richmond	<u>100%</u>	36,821	9.0%	39,186	7.7%	51,728	9.3%	52,486	9.4%	40,751	7.3%	45,795	8.2%	50,907	8.5%
South Bayshore	<u>0%</u>	17,058	4.2%	32,330	6.4%	31,745	5.7%	31,745	5.7%	35,512	6.3%	31,590	5.6%	46,167	7.7%
South Central	<u>0%</u>	29,237	7.2%	31,460	6.2%	30,864	5.5%	30,864	5.5%	30,358	5.4%	36,841	6.6%	36,131	6.1%
South of Market	<u>0%</u>	36,882	9.1%	68,305	13.4%	62,429	11.2%	62,429	11.2%	86,097	15.3%	75,255	13.4%	69,779	11.7%
Treasure Island	<u>0%</u>	682	0.2%	10,927	2.1%	10,911	2.0%	10,911	2.0%	11,072	2.0%	11,078	2.0%	11,470	1.9%
Western Addition	<u>57%</u>	31,631	7.8%	37,294	7.3%	43,405	7.8%	40,449	7.2%	44,278	7.9%	40,091	7.1%	41,264	6.9%
Total	<u>N/A</u>	407,044	100.0%	508,730	100.0%	558,600	100.0%	558,600	100.0%	561,869	100.0%	561,869	100.0%	596,348	100.0%

- Notes:
1. The modeling of the 2050 Eastside and Dispersed Growth land use patterns inadvertently double counted existing units in approximately 41 TAs resulting in an error of approximately 3,200 excess units, primarily locating in the northwest quadrant of San Francisco, This modeling error does not affect any of the conclusions presented in the EIR.
 2. Well-resourced areas are high- and highest-resource areas, which are neighborhoods identified by the State of California that provide strong economic, health, and educational outcomes for its residents. This percentage is based on state data from 2021; the state annually updates the opportunity area maps based on updated economic, education, and health data. As a result, the opportunity area map boundaries may slightly fluctuate year to year.

The revised Appendix A table shows that the housing growth would be distributed throughout the city under the proposed action, which includes development under the 2050 environmental baseline plus development under the housing element update. For example, South Bayshore, which is outside a well-resourced area, is projected to grow from approximately 17,100 housing units in 2020 to approximately 32,300 housing units under the 2050 environmental baseline (approximately 15,200 more housing units than in 2020). Under the housing element update, South Bayshore is projected to grow to approximately 31,700 housing units in 2050 (or approximately 14,600 more housing units than in 2020) because the housing element update is expected to shift a small portion of its anticipated growth elsewhere.

Please refer to Response PD-1 for additional examples of possible distribution patterns of future development growth. As described in Response PD-1, the maps included in the draft EIR are not intended to precisely indicate future rezoning programs or future housing development growth locations (e.g., **draft EIR Figure 2-7**). In response to the comments regarding possible distribution patterns, two additional examples of possible distribution patterns for future development growth consistent with the housing element update are included for informational purposes in Response PD-1. These additional examples show possible distribution patterns with lower height limits for lots along streets in RH districts and changes in height limits along several transit corridors. Furthermore, the draft EIR distributes new housing growth throughout the city for each of the four alternatives it considers. For example, the Eastside Alternative would direct housing units throughout the city but focus it on the east side, primarily in neighborhoods with existing area plans; in existing neighborhood commercial districts; and along corridors such as Van Ness Avenue, Mission Street, and Third Street. As shown in the Appendix A table in draft EIR Appendix C, South Bayshore is projected to grow from approximately 17,100 housing units in 2020 to approximately 35,500 housing units under the 2050 Eastside Alternative (approximately 18,400 housing units).

Regarding residential side street height limits, the No Project Alternative, Eastside Alternative, and the Dispersed Growth Alternative studied in the draft EIR would maintain existing height limits in RH districts. For these reasons, the suggested alternatives that have RH use district height limits of less than 85 feet do not warrant further consideration.

Regarding the equitable distribution of growth in relation to even the distribution of growth, the city defines racial equity as 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 (San Francisco Administrative Code section 12A.19[a]). One housing element update objective is to repair the harms of racial, ethnic, and social discrimination against American Indian, Black, and other people of color. To meet this and other equity objectives, the housing element update would increase housing production and shift a greater share of anticipated growth from the east side of the city to well-resourced areas along transit corridors and low-density areas, which are located primarily on the west and north sides of the city. This would align with the city's definition of racial equity because the east side of the city is where most priority equity geographies and areas vulnerable to displacement are located, based on historical context and systemic harm done to specific racial groups, such as segregation in public housing or development patterns resulting from redlining and urban renewal. For these reasons, the even distribution of growth is not equivalent to the equitable distribution of growth, and such a concept does not warrant further consideration.

Water Supply Constraint Alternative

One comment suggests there is no substantial evidence that there will be enough water to supply the amount of new housing that the housing element update seeks to achieve. For this reason, the comment states that the EIR must study an alternative that limits the amount of future housing growth to a degree that could be served by foreseeable water supplies without more than 20 percent rationing. Please refer to Response UT-1 regarding the adequacy of the water supply analysis for the proposed action. This suggested alternative would construct fewer units than the proposed action and would therefore fail to meet the primary objective of the housing element update, which is to accommodate San Francisco's RHNA and meet future housing demand as well as advance racial and social equity. For this reason, this suggested alternative does not warrant further consideration.

However, as discussed in draft EIR Section 4.9, Utilities and Service Systems, under Impact UT-1 (refer to draft EIR pp. 4.9-14 through 4.9-28), the city's future water supply may be affected by implementation of the Bay-Delta Plan Amendment. The Bay-Delta Plan Amendment (refer to draft EIR pp. 4.9-2 and 4.9-3) is a state-level water policy that would affect the water supply throughout the state, including San Francisco, and therefore have implications on whether the city would be able to provide an adequate water supply to support its projected population growth. On pp. 4.9-2 and 4.9-3 of Section 4.9 of the draft EIR, "implementation of the Bay-Delta Plan Amendment is uncertain because of pending legal challenges and outstanding regulatory actions." Therefore, the draft EIR describes water supply impacts under two scenarios: the proposed action with implementation of the Bay Delta Plan Amendment and without implementation. The projections regarding water demand and supply show that, regardless of whether the proposed action is adopted, the city would not have adequate water supplies available during single and multiple dry years if the Bay-Delta Plan Amendment is implemented. Even without the housing element update (i.e., under baseline conditions), the city would need to develop new or expanded water supply facilities in anticipation of single and multiple dry years under the Bay-Delta Plan Amendment. Therefore, the EIR finds that a significant and unavoidable impact would occur with implementation of the proposed action because it would result in a considerable contribution to the projected dry-year shortfalls and the related need to develop new or expanded water supply facilities in consideration of the Bay Delta Plan Amendment. However, as previously stated, even without implementation of the proposed action, the city would most likely need to develop new or expanded water supply facilities in anticipation of single and multiple dry years if the Bay-Delta Plan Amendment were to be implemented.

As described in draft EIR Section 4.9, Utilities and Service Systems, and Response UT-1, under the proposed action and without implementation of the Bay-Delta Plan Amendment, San Francisco has an adequate water supply to meet demand in normal and single dry years through 2050. In multiple dry years, there would be shortfalls, but these can be met with rationing, which would be below 20 percent on a system-wide basis. These conclusions are substantiated by information in the 2020 UWMP³¹ and additional analysis prepared by SFPUC (see draft EIR, pp. 4.9-14 to 4.9-18).³² In addition, even under the No Project Alternative, which assumes growth under existing housing element policies, SFPUC confirmed that it would not be feasible to make up the projected shortfalls that would occur if the Bay-Delta Plan Amendment were to be implemented by imposing

³¹ San Francisco Public Utilities Commission, *2020 Urban Water Management Plan for the City and County of San Francisco*, 2021, https://sfpuc.org/sites/default/files/programs/local-water/SFPUC_2020_UWMP2020_%20FINAL.pdf, accessed October 19, 2022.

³² San Francisco Public Utilities Commission. *Memo re: Substantiation for Housing Element Update EIR*. April 22, 2022.

additional rationing requirements (i.e., above 20 percent) on San Francisco water customers. This is because San Francisco's per capita water use is already extremely low relative to other cities in California. Therefore, SFPUC would need to explore other conservation and efficiency measures, as well as potential new sources of water supply, to support projected future growth. This effort would be necessary even without the proposed housing element update.³³ An alternative to limit growth such that no water rationing above 20 percent would be required is thus infeasible and immaterial.

Conclusion

The EIR does not need to study every conceivable alternative to a project but must study a reasonable range of alternatives that foster informed decision making. The EIR provides a range of reasonable alternatives to the proposed action that meet the basic project objectives and reduce the significant impacts of the project. The comments do not provide substantial evidence as to why the range of EIR alternatives is inadequate. No additional analysis or change to the EIR is required.

Comment ALT-2: Preservation Alternative

This response addresses the comments from the commenters listed below; the comment on this topic is quoted in full below this list.

- A-Diamond-6
- A-Diamond_2-9
- A-HPC-2
- A-HPC-8
- I-Schuttish-1

“On page 6-43, it would be helpful if you can confirm that the mitigation policies pointed out in the preservation alternative would not materially impair the significance of built-environment historic resources and historic districts.

Why not just to the Buena Vista, Ingleside, Marina, and Western Addition neighborhoods but apply generally to the entire west side?” (*Sue Diamond, Planning Commission, June 9, 2022, [A-Diamond-6]*)

“Page 6-43 states that the Preservation Alternative would revise housing element policies to further promote future development that would not materially impair the significance of built environment historic resources and historic districts. Please confirm that such policies apply not just to the Buena Vista, Ingleside, Marina and Western Addition neighborhoods, but to all areas of the westside proposed for future housing units where there

³³ Ibid.

are are built environment historic resources and historic districts.” (*Sue Diamond, Planning Commission, July 11, 2022, [A-Diamond_2-9]*)

“The HPC found the preservation alternative to be adequate. Commissioners approved of the preservation alternative including the same number of housing units as the proposed action while reducing impacts on built environment historic resources and generally having the same or less impacts than the proposed action.” (*Historic Preservation Commission, June 7, 2022, [A-HPC-2]*)

“Commissioner Wright requested further clarification about . . . if the built environment historic resource mitigation measures would be applicable to future development projects if the preservation alternative was selected.” (*Historic Preservation Commission, June 7, 2022, [A-HPC-8]*)

“I sent some written comments on page S.6, the Preservation Alternative is described as the Environmentally Superior Alternative. That’s fine.

I’d like to understand how this would work with the – with what’s on the Housing Element, the draft, the third draft, on page 163 of the packet about policy in action no. 2060, which would basically get rid of conditional use for demolition.” (*Georgia Schuttish, June 9, 2022, [I-Schuttish-1]*)

RESPONSE ALT-2

One comment requests confirmation that the mitigation policies for the Preservation Alternative would not result in material impairment of the significance of built-environment historic resources and districts. Two comments request confirmation that the Preservation Alternative policies would apply to more neighborhoods than only the Buena Vista, Ingleside, Marina, and Western Addition neighborhoods. The historic preservation commission stated that it found the Preservation Alternative adequate. Another comment asks if the mitigation measures for built-environment historic resources would be applicable to future development projects if the Preservation Alternative is selected. One comment requests clarification about the Preservation Alternative and housing element policy. For the purposes of this response, it is assumed the commenter is referring to housing element update policy 26 (in the third draft, March 2022, and fourth draft, October 2022).

Description of Preservation Alternative

On draft EIR p. 6-11, the description of the Preservation Alternative states it would include revisions to policies to limit impacts on built-environment historic resources such as protecting parcels with individual historic resources from future development, promoting the use of the Secretary of the Interior’s Standards for Rehabilitation (secretary standards) in future development of parcels with historic resources, and requiring

resources within historic districts to be compatible with historic districts. Draft EIR p. 6-11 goes on to state that application of the policies would very likely result in the following:

- New construction in historic districts would prioritize the development of small and mid-rise multi-family buildings on non-contributing parcels that would be compatible in scale, material, and massing with the historic districts.
- On sites with properties that contribute to historic districts, housing density would be increased, primarily through the construction of accessory dwelling units, which would be designed to meet the secretary's standards.
- New development projects on parcels that contain built-environment historic resources would be sited and designed to reduce impacts on the resource, such as building within vacant or non-character-defining portions of the parcel.

Application of the above policies would reduce impacts on built-environment historic resources because these policies specify common strategies for reducing significant built-environment impacts to less-than-significant levels. In Appendix C to the draft EIR, the methodology for developing the Preservation Alternative is documented. As stated there, policies in the Preservation Alternative would differ from the those in the proposed action in that they may be modified to reflect a focus on preserving built-environment historic resources.

To develop the possible distribution of growth that would result from the Preservation Alternative's policies, it was assumed that planning districts with a greater percentage of historic resources forecast would accommodate less growth/fewer new units, based on application of the above policies. However, as stated on draft EIR p. 6-43, the policies would not entirely prevent future development consistent with the alternative from resulting in material impairment of historic built-environment resources. Mitigation Measures M-CR-1a through M-CR-1l would be applicable under the Preservation Alternative but would not reduce built-environment historic resource impacts to a less-than-significant level. The cultural resource (built-environment) impact of the Preservation Alternative would be reduced compared to the proposed action but would remain significant and unavoidable with mitigation, the same as the proposed action.

Applicability of Policies under the Preservation Alternative

The policies proposed under the Preservation Alternative would apply to future development throughout the entire city, not only the Buena Vista, Ingleside, Marina, and Western Addition planning districts. Draft EIR p. 6-43 identifies which planning districts are projected to receive fewer housing units under the Preservation Alternative (i.e., the Buena Vista, Ingleside, Marina, and Western Addition planning districts) in comparison with the proposed action due to the outcome of the 2050 historic resources forecast and neighborhood historic resource pattern analysis in those areas that would be subject to the Preservation Alternative policies.

The historic preservation commission's finding that the Preservation Alternative is adequate is noted. In addition, the mitigation measures for built-environment historic resources would be implemented if the Preservation Alternative is selected. As stated on draft EIR p. 6-43, Mitigation Measures M-CR-1a through M-CR-1l

would be required under the Preservation Alternative. Please refer to Response GC (NON-CEQA)-4 for further information about the implementation process for the housing element update.

An action under housing element update policy 26 (draft 4, October 2022) proposes to update the planning code to remove the conditional use processes for the demolition of non-tenant-occupied single-family or multi-unit buildings without a history of tenant evictions when increased density is proposed in accordance with the requirements of state law (Housing Crisis Act) and calls for equivalent affordability rates (i.e., equal to the rates prior to demolition) when replacing rent-controlled and permanently affordable units.

For buildings where policy 26 would apply, removing the requirement for a conditional use authorization for demolition may eliminate the requirement for a hearing before the commission but would not eliminate the requirement to obtain a building permit for demolition (future action). The department would conduct CEQA review of the future action, as applicable, which would consider the impact on historic resources.

See “Description of Preservation Alternative” above, which presents information about the Preservation Alternative and how it would modify policies to preserve built-environment historic resources.

No additional analysis or change to the EIR conclusions regarding this topic is required.

Comment ALT-3: Project Objectives

This response addresses the comment from the commenter listed below; the comment on this topic is quoted in full below this list.

- A-Imperial-2

“So, I see that we have in Table 6.8, there is the project objective and how the alternatives are actually being met on this; however, it is also not adequately I would say explained in terms of the racial and social equity.” (*Theresa Imperial, Planning Commission, June 9, 2022, [A-Imperial-2]*)

RESPONSE ALT-3

The comment states that the EIR does not adequately explain how the alternatives to the proposed action meet project objectives in terms of racial and social equity.

As noted by the commenter, **draft EIR Table 6-8** in Chapter 6, Alternatives, summarizes the ability of the alternatives to meet the objectives of the proposed action. Immediately following **draft EIR Table 6-8** on pp. 6-139 to 6-141, more details are provided that explain how each alternative meets the basic project objectives, including advancing racial and social equity. The following restates and, in some instances, expands upon that information.

The No Project Alternative would not encourage the development of housing affordable to all incomes in high- and highest-resource neighborhoods and therefore would be less successful than the proposed action at

advancing racial and social equity. In addition, the No Project Alternative would continue the existing development pattern on the east side of the city—specifically, in the areas where most of the priority equity geographies are located as well as areas that are vulnerable to displacement. As such, this alternative would be less successful than the proposed action in recognizing the right to housing as a foundation for health and social and economic well being; repairing the harms of historic racial, ethnic, and social discrimination against American Indian, Black, and other people of color; and fostering racially and socially inclusive neighborhoods through equitable distribution of investment and growth. In addition, the No Project Alternative would not meet the objective to provide adequate housing for existing residents and future generations in a city with diverse cultures, family structures, and abilities because it would not meet the goal of 150,000 housing units by 2050.

The Eastside Alternative and Dispersed Growth Alternative would result in the same amount of housing units as the proposed action. However, these alternatives result in more housing growth on the east side of the city compared with the proposed action—specifically, in the areas where most of the priority equity geographies are located as well as areas that are vulnerable to displacement. As such, the department determined that these alternatives would be less successful than the proposed action in repairing the harms of historic racial, ethnic, and social discrimination against American Indian, Black, and other people of color and fostering racially and socially inclusive neighborhoods through an equitable distribution of investment and growth. For these reasons, these alternatives would be less successful in affirmatively furthering fair housing laws, which require that the plan address patterns of segregation and exclusion.

The Preservation Alternative would result in the same amount of housing as the proposed action. However, the department determined that this alternative would be less successful than the proposed action at advancing racial and social equity because it would redistribute housing growth, based on impacts on built-environment historic resources and not intangible cultural heritage. The Preservation Alternative would largely redirect growth from less racially diverse but well-resourced areas to more racially diverse areas. Because more growth would be directed to diverse and well-resourced areas, this alternative would not be as successful as the proposed action in fostering racially and socially inclusive neighborhoods through an equitable distribution of investment and growth because less-diverse areas would see less growth.

Refer to Response GC (CEQA)-1 for a summary of the potential environmental impacts of future development consistent with the housing element update.

No additional analysis or change to the EIR conclusions is required.

Comment ALT-4: Environmentally Superior Alternative

This response addresses the comments from the commenters listed below. Out of the nine individual comments, three comments are unique and therefore quoted in full below this list. Where the same comment is made by a number of individuals, the text is provided verbatim but not repeated multiple times. The names of the individuals who made the same comment are provided following the comment. Complete letters, emails, and the transcript are provided in full in Attachments 1 and 2 of this RTC document.

- O-REP_3-3
- I-Elmendorf-7
- I-Kanter-3

- I-Bargar-3
- I-Fruchtman-3
- I-Randecker-3
- I-Boudreau-3
- I-Ivan-3
- I-Webb-3

“It is unclear how the Preservation Alternative, which is described as the “environmentally superior” alternative, or elements of the Preservation Alternative, have been incorporated into the mitigations for the Proposed Action (the Proposed Project).” (*Joseph Smooke, Race and Equity in all Planning Coalition, July 12, 2022, [O-REP_3-3]*)

“The EIR should therefore not refer to the No Project Alternative as the environmentally superior alternative, as doing so fails to recognize the GHG emissions which would result from it. Instead, the DEIR should plan to accommodate over 10,000 new housing units per year to address the climate crisis.” (*Cliff Bargar, June 8, 2022, [I-Bargar-3]; the following commenters provided the same comment: I-Boudreau-3, I-Fruchtman-3, I-Ivan-3, I-Kanter-3, I-Randecker-3, and I-Webb-3*)

“The final EIR should discuss statewide and regional environmental benefits of higher- growth alternatives.

The DEIR asserts that the No Project Alternative is the “environmentally superior alternative” “[b]ecause it would result in the construction and operation of approximately 50,000 fewer housing units” than the other alternatives (S-5). This statement about the environmental effects of curtailing development in San Francisco may be formally true within the funhouse-mirror world that CEQA has created, but it is sheer nonsense as a proposition about the real world.

Increasing the size of San Francisco’s housing stock is an unequivocal environmental (and economic) win from global, national, statewide, and regional perspectives. The more people whose preference to live in San Francisco can be accommodated, the fewer people will end up living in places where they produce more CO₂, displace wildlife, fill wetlands, bulldoze scenic vistas, disrupt the management of wildfire, and congest highways. CEQA may be blind to the environmental impacts of people whom San Francisco would fence out by restricting housing development, but CEQA’s elision does not launch them off Planet Earth. If there’s a feasible alternative that would allow them to live in San Francisco—an already urbanized area in a mild climate with excellent public transit—that alternative is almost surely the actual environmentally superior alternative.

It would be a welcome change for the final EIR to honor CEQA’s purpose of “inform[ing] the government and public about a proposed activity’s potential environmental impacts” (California Bldg. Indus. Assn. v. Bay Area Air Quality Mgmt. Dist. (2015) 62 Cal. 4th 369, 382) by addressing the substantial environmental benefits, not just the local downsides, of higher- growth alternatives.” (*Christopher Elmendorf, May 10, 2022, [I-Elmendorf-7]*)

RESPONSE ALT-4

A comment asks how elements of the Preservation Alternative have been incorporated into the proposed action as mitigation. The other comment misstates that the No Project Alternative is the environmentally superior alternative and that the EIR should consider the environmental benefits of alternatives.

One commenter accurately notes some regional environmental benefits to locating more housing in San Francisco. The draft EIR notes that approximately 50,000 fewer housing units would be provided in San Francisco under the No Project Alternative. As a result, this housing would most likely occur elsewhere in the Bay Area region, in areas where average VMT per capita and energy use would be greater than the citywide average. This would result in increased VMT and energy usage for the Bay Area under the No Project Alternative (draft EIR p. 6-113 and p. 6-136). However, as stated on draft EIR p. 6-141, the EIR must identify the alternative to the proposed action that would have the least adverse environmental impacts (i.e., the environmentally superior alternative), per CEQA Guidelines section 15126(c). Environmental benefits can be considered by decision makers. As discussed on draft EIR p. 6-142, according to CEQA Guidelines section 15126.6(e)(2), if the “no project” alternative is the environmentally superior alternative, the EIR should also identify an environmentally superior alternative from among the other alternatives. The EIR then states that, among the other alternatives, the Preservation Alternative would be the environmentally superior alternative because it would reduce significant impacts on built-environment historic resources. It is not a requirement under CEQA for elements of the environmentally superior alternative to be incorporated into the proposed action as mitigation or as additional policies. Mitigation measures are identified for the proposed action to partially compensate for impacts on historic built-environmental resources from future development consistent with the housing element. These measures include feasible design changes, avoidance, preservation, relocation, comprehensive documentation, and memorialization of the affected resource. City decision makers will decide whether to approve the proposed action or an alternative, including any associated policies and mitigation measures.

No additional analysis or change to the EIR conclusions regarding alternatives is required.

Comment ALT-5: No Project Alternative

This response addresses the comments from the commenters listed below. Out of the 15 individual comments, four comments are unique and therefore quoted in full below this list. Where the same comment is made by a number of individuals, the text is provided verbatim but not repeated multiple times. The names of the individuals who made the same comment are provided following the comment. Complete letters, emails, and the transcript are provided in full in Attachments 1 and 2 of this RTC document.

- I-Bargar-1
- I-Fruchtman-1
- I-Perla-1
- I-Boudreau-1
- I-Ivan-1
- I-Randecker-1
- I-Bunemann-1
- I-Kanter-1
- I-Vijayaraghavan-1
- I-DiMento-1
- I-Kattouw-1
- I-Webb-1

• I-Elmendorf-6

• I-Marzo-1

• I-Whitfield-1

“The Draft Environmental Impact Report (topic 2019-016230ENV) does not adequately address the transportation impacts of building more housing, especially on Vehicle Miles Traveled (VMT). Transportation is an important topic because “San Francisco has many more jobs than homes; as a result, workers must commute into San Francisco each day to reach their jobs” (4.1-68). The DEIR further states that “on average, people living or working in San Francisco have lower levels of VMT per capita than people living or working elsewhere in the nine-county San Francisco Bay Area region” (4.4-12). The message is clear that SF commuters impact the environment less than other residents and workers in the Bay Area region. This means that any environmental analysis should also consider the impact of a project and alternatives on the nine-county Bay Area as a whole.

However, the DEIR fails to reflect regional VMT in its analysis of which alternative is environmentally superior. The DEIR claims that the No Project Alternative is environmentally superior because it would construct fewer housing units (S-5); this claim is at odds with the impact of GHG emissions from the No Project Alternative. The DEIR determines that “although regional total daily VMT would increase because of the additional housing, the percentage increase would be less than what would be anticipated if the additional housing were located in an area with per capita VMT that is higher than the regional average.” In other words, the No Project Alternative would lead to higher regional VMT and therefore greenhouse gas emissions because it would not decrease the number of workers who commute into San Francisco from areas with higher VMT per capita. *(Cliff Bargar, June 8, 2022, [I-Bargar-1]; the following commenters provided the same comment: I-Boudreau-1, Fruchtman-1, I-Kanter-1, I-Randecker-1, and I-Webb-1)*

“This Environmental Impact Report fails to recognize the statewide and regional environmental benefits of higher-growth alternatives. On the contrary, the report considers the No Project Alternative environmentally superior as 50,000 less housing units would be planned for (S-5). This couldn’t be further detached from reality:

According to a study by Apartment List on 2017 data, the Bay Area and its exurbs had the nation’s highest share of super commuters traveling 90 min or more to work. Building less housing units in San Francisco forces people to live in such places where they produce more CO₂, displace wildlife, fill wetlands, bulldoze scenic vistas, disrupt the management of wildfire, and congest highways. Building new housing in San Francisco on the other hand would allow those people to take advantage of our public transit systems and live in energetically efficient multi-family units.

Therefore, I ask you to in particular reconsider Impact GHG-1 for the No Project Alternative to reflect the higher greenhouse gas emissions this alternative would cause, and study rezoning for over eighty thousand additional units, as our RHNA requires, which would have significant positive environmental benefits.” *(Jonathan Bunemann, June 7, 2022, [I-Bunemann-1]; the following commenters provided the same comment: I-DiMento-1, I-Kattouw-1, I-Marzo-1, I-Perla-1, I-Vijayaraghavan-1, and I-Whitfield-1)*

“The analysis of the No Action Alternative should discuss environmental impacts of noncompliance with the Housing Element Law.

The DEIR’s discussion of the No Action Alternative presumes that it would leave the regulatory status quo in place. This is false. If the city does not adopt a substantially compliant housing element, it will forfeit authority to deny or “render infeasible” 20% low-income and 100% moderate-income projects on the basis of the city’s zoning code and general plan land-use designations. (Gov’t Code 65589.5(d)(5); Elmendorf, “A Primer on California’s ‘Builder’s Remedy’ for Housing-Element Noncompliance” (UCLA Lewis Center for Regional Policy Studies, April 2022).) There is also the possibility of a court order suspending the city’s authority to issue certain classes of building permits (Gov’t Code 65755(a)), and, eventually, a court-led rewriting of the city’s housing element (Gov’t Code 65585(l)).

Obviously, it is very hard to predict how these consequences of noncompliance would affect the amount, type and distribution of housing development in San Francisco. The EIR therefore needn’t address this topic in great detail. But if the EIR is to serve its function as an informational document, it should provide the responsible decision makers with at least a rudimentary sketch of the potential environmental effects of noncompliance.” *(Christopher Elmendorf, May 10, 2022, [I-Elmendorf-6])*

“I agree with all of the below statement, however it is very technical. I will say more plainly, its not clear how it is possible to think that building a denser city would be worse for the environment than encouraging sprawl across the bay area and the state. To think this requires a severe lack of critical thinking skills. I know the language is harsh, but it is the truth.

The Draft Environmental Impact Report (topic 2019-016230ENV) does not adequately address the transportation impacts of building more housing, especially on Vehicle Miles Traveled (VMT). Transportation is an important topic because “San Francisco has many more jobs than homes; as a result, workers must commute into San Francisco each day to reach their jobs” (4.1-68). The DEIR further states that “on average, people living or working in San Francisco have lower levels of VMT per capita than people living or working elsewhere in the nine-county San Francisco Bay Area region” (4.4-12). The message is clear that SF commuters impact the environment less than other residents and workers in the Bay Area region. This means that any environmental analysis should also consider the impact of a project and alternatives on the nine-county Bay Area as a whole.

However, the DEIR fails to reflect regional VMT in its analysis of which alternative is environmentally superior. The DEIR claims that the No Project Alternative is environmentally superior because it would construct fewer housing units (S-5); this claim is at odds with the impact of GHG emissions from the No Project Alternative. The DEIR determines that “although regional total daily VMT would increase because of the additional housing, the percentage increase would be less than what would be anticipated if the additional housing were located in an area with per capita VMT that is higher than the regional average.” In other words, the No Project Alternative would lead to higher regional VMT and therefore greenhouse gas emissions because it would not decrease the number of workers who commute into San Francisco from areas with higher VMT per capita. *(David Ivan, June 9, 2022, [I-Ivan-1])*

RESPONSE ALT-5

Several commenters misstate that the No Project Alternative is the environmentally superior alternative. One comment relates to the No Project Alternative and the environmental impacts of noncompliance with housing element law.

Refer to Response ALT-4 for a discussion of the environmentally superior alternative. As stated on draft EIR p. 6-128, the No Project Alternative would result in greater regional VMT and related GHG emissions, as well as energy use, compared with the proposed action because the additional housing units would not be constructed in the city. Instead, these housing units would most likely be constructed elsewhere in the San Francisco Bay Area.

Regarding noncompliance with housing element law under the No Project Alternative, the commenter assumes that the city would take no action to adopt a housing element that substantially complies with housing element law. A substantially compliant housing element is required to remain eligible for certain state funds and maintain the ability to approve or deny housing projects. Thus, under the No Project Alternative, the city would take appropriate steps to adopt a new housing element that substantially complies with housing element law; however, that element would continue the policies in the 2014 housing element wherein development would continue to occur in the same areas and in the same general manner as it has under the existing housing element (i.e., on the east side of the city). Additional policies may be required to further other required components of the housing element law (e.g., to affirmatively further fair housing).

Under state housing element law, the housing element revision is due by January 31, 2023. According to HCD's website, jurisdictions that fail to adopt a housing element that has been found in substantial compliance within 120 days of the statutory deadline to revise the housing element must complete all necessary rezones within one year of that statutory deadline. This means that jurisdictions must adopt the housing element and that the housing element must be found in compliance (through a letter from HCD affirming compliance) with housing element law within 120 days of the statutory deadline or they will need to complete rezoning within one year of their housing element due date (as opposed to three years) to maintain housing element compliance. It should be noted that these deadlines were generally extended for jurisdictions within the Southern California Association of Governments in Senate Bill 197, but it would be speculative to assume that the state legislature would adopt similar amendments for jurisdictions within the Association of Bay Area Governments. Jurisdictions that adopt their housing elements more than one year from the statutory deadline cannot be found in substantial compliance with housing element law until the local government has completed any required rezoning. In addition, without a compliant housing element, some scholars argue that jurisdictions may be limited in their ability to disapprove certain projects, including projects that contain at least 20 percent affordable housing, under Government Code section 65589.5(d)(5). These provisions of the housing element law do not relieve local agencies from complying with CEQA or the California Coastal Act, and local agencies can still require projects to comply with development standards in accordance with Government Code section 65589.5(f). The EIR presumes that the proposed action, and the alternatives, if adopted, would comply with the law. Thus, as the commenter acknowledges "it is very hard to predict of these consequences of non-compliance" and that "[t]he EIR therefore needn't address this topic in great detail."

CEQA Guidelines section 15126.6(e)(2) specifies that an EIR's No Project Alternative analysis should discuss "what would be reasonably expected to occur." The draft EIR analyzes and presents the impacts and effects of the No Project Alternative consistent with CEQA. It is unclear how the environmental effects would differ from the No Project Alternative under the hypothetical scenario speculated by the commenter. Therefore, it is not discussed further.

No additional analysis or change to the EIR conclusions regarding this topic is required.

K. General (CEQA)

The comments and corresponding responses in this section cover general CEQA issues. These include topics related to:

- GC (CEQA)-1: EIR, General
- GC (CEQA)-2: CEQA Outreach Process
- GC (CEQA)-3: Environmental Review for Future Actions Consistent with the Housing Element 2022 Update

Comment GC (CEQA)-1: EIR, General

This response addresses the comments from the commenters listed below. Out of the 52 individual comments, 17 comments are unique and are therefore quoted in full below this list. Where the same comment is made by a number of individuals, the text is provided verbatim but not repeated multiple times. The names of the individuals who made the same comment are provided following the comment. Complete letters, emails, and the transcript are provided in full in Attachments 1 and 2 of this RTC document.

- | | | |
|-----------------|------------------|------------------|
| • A-Diamond_2-3 | • I-Federman-2 | • I-Perla-2 |
| • A-HPC-7 | • I-Frankel-2 | • I-O'Neill-4 |
| • A-Imperial-1 | • I-Fruchtman-2 | • I-Powell-2 |
| • A-Tanner-1 | • I-Glick-3 | • I-Pressman-4 |
| • O-JTF-5 | • I-Greenfield-4 | • I-Randecker-2- |
| • O-YCD-2 | • I-Hong-1 | • Rogers-2 |
| • I-Ayers-2 | • I-Ivan-2 | • I-Rose-2 |
| • I-Bargar-2 | • I-Johnson-2 | • I-Russell-2 |
| • I-Besmer-2 | • I-Kanter-2 | • I-Schwartz-2 |
| • I-Boken-2 | • I-Kaplan-2 | • I-Simmons-2 |
| • I-Boudreau-2 | • I-Kattouw-2 | • I-Subin-2 |

- I-Bunemann-2
- I-Chen-4
- I-Conner-2
- I-Damerджи-2
- I-Day-2
- I-DiMento-2
- I-Esfandiari-2

- I-Klenk-2
- I-Kline-2
- I-Lee-2
- I-Kline_2-2
- I-Mahoney-3
- I-Marzo-2
- I-Munoz-2

- I-Tyburski-2
- I-Vijayaraghavan-2
- I-Watson-2
- I-Webb-2
- I-Whitfield-2
- I-Perla-2

“One of the most wonderful aspects of residential life in San Francisco is its plethora of distinct neighborhoods. Residents take pride in the architecture, neighborhood centers, streetscapes, culture, history, individual character etc of their neighborhoods, some of which are historic or historic-eligible districts. As a result, I believe that as the City takes action to increase the density on the west side it needs to be mindful to do so in a way that does not undermine or destroy the unique identifying characteristics of these neighborhoods and ends up with bland nondescript neighborhoods devoid of the current points of pride. Thus, while the buildings that front on commercial streets may be able to support heights of 85’ or 65’, I do not believe that the residential side streets should be increased to 85’ or even 65’. Further, at such time that the City undertakes the block by block analysis that is a necessary precursor to any rezoning and height increase on the west side to implement Housing Element policies, it needs to ensure that any such rezoning and height increases:

- a. Do not lead to actions that divide established neighborhoods; and
- b. Do not interfere with, or affect the integrity of, the fabric, scale, character or consistency of, any historic or historic-eligible districts; and
- c. Do not significantly undermine the unique points of identity and individual character of established neighborhoods. By way of example (any many other examples could be provided for this last point “c”, the City should:
 - i. Consider whether it is important to the character of an existing neighborhood to retain a single height standard (even if it is a little higher than current height standards) rather than applying varying new heights standards within identifiable neighborhoods that are currently characterized by a single height standard; and
 - ii. Not apply height standards that result in significant additional shadowing of playgrounds, school yards, parks and neighborhood gathering spaces at times when they are well-used; and
 - iii. Require setbacks/stepbacks to accompany height increases to ensure the maintenance of current street walls where the street walls help define the character of the neighborhood.” *(Sue Diamond, Planning Commission, July 11, 2022, [A-Diamond_2-3])*

“Commissioner Wright requested further clarification about how future development projects would be reviewed under the preservation alternative or another alternative, if selected, in comparison to the proposed action...” (*Historic Preservation Commission, June 7, 2022, [A-HPC-7]*)

“And one thing just what Commissioner Diamond kind of touched on, too, is the issue on the transportation circulation and utilities and service system, and those are the two things where mitigation is not even feasible.

So I am worried on that, and I don't think that is something that is adequately addressed, or perhaps, I would like to hear more in terms of whether mitigation or the policies that we will have or the City's planning to do on this.

And in other -- and as what other public comments was mentioned about the environmental impacts on demolition, it sounds like this is covered under other areas of noise and vibration, air quality, wind and shadow; however, you know, I think the way we will look into this in the environmental impact aspect which is already in CEQA itself, but it kind of fails to connect into what we always look into the racial and social equity.

So I think that's what the comments -- when we look into this EIR, we are really looking into the environmental impact, but in the way of how we correlate this to the racial and social impact.” (*Theresa Imperial, Planning Commission, June 9, 2022, [A-Imperial-1]*)

“I think part of what is coming to my mind is just how much this Housing Element is forcing us to think about, really, what it means to grow as a city in the significant numbers this RHNA cycle is talking about, which is just really unprecedented for us in the face of what seems like a lot of calamities at the same time: climate change, drought, the loss of population that our city has also had, the changing shift of jobs with hybrid work, and I think we keep thinking maybe we are in this interim period where we really don't know what's going to happen in the future and then that interim period keeps stretching on and on as, you know, there are more surges of COVID and everything like that.

So, it feels a little bit difficult to plan and yet I think we are doing a really good job of trying to think about these big systems: transportation, water, both wastewater and drinking water.

And to me it's -- there is the environmental impact and then that to me is the call for action for what we are going to do about it as for the city? How are we going to mitigate that? How are we going to build what we need?

And that's not just the underground infrastructure but the people infrastructure, the parks, the open space, you know, things that are not environmental, the schools, libraries, etc., that are going to be impacted by the population growth we are planning for.” (*Rachael Tanner, Planning Commission, June 9, 2022, [A-Tanner-1]*)

“Furthermore, the mitigation measures included in the DEIR are not adequate to address the potential impact of the significant changes shown in the report. Such dramatic changes, as noted above, warrant further impact

analyses. This is the basis of the following comments, recommendations, and requests for clarifications.” (*Emily Murase, Japantown Task Force, June 21, 2022, [O-JTF-5]*)

“This DEIR grossly underestimates the environmental impact that will be caused by the policies recommended by this housing element.” (*Zach Weisenburger, Young Community Developers, June 9, 2022, [O-YCD-2]*)

“I urge you to address the comments made by UC Davis Professor Chris Elmendorf in his analysis of the draft EIR:

https://drive.google.com/file/d/10pIS1Sd6T7FdKBkgd5DD1MbOsEnJgbE1/view____.YXAzOnNmZHqYOmE6bzo1NWY0MjdHOGYwMDY2MWlyZTA5MDAwZWJiMTMzMzk0Zjo2OjFhYmI6YzFmZTA2NmQ0MjcyYmQ5MjMzMmNmNmQ5MjM5NDZlZmQ4ZTJjMTI0IGZlNDNmMGY5N2I2OTI2ZjIzNDExZDMxYzpo0lQ” (*Charles Ayers, June 8, 2022, [I-Ayers-2]*; the following commenters provided the same comment: *I-Besmer-2, I-Conner-2, I-Klenk-2, I-Rogers-2, I-Rose-2, I-Schwartz-2, and I-Simmons-2*)

“UC Davis Professor Chris Elmendorf has written a letter to the city detailing these concerns in more detail, and I support his comments:

https://drive.google.com/file/d/10pIS1Sd6T7FdKBkgd5DD1MbOsEnJgbE1/view____.YXAzOnNmZHqYOmE6bzpkNmJkMjg3NTJkOGZkMDE0NGQ1MGM1ZmYwODhkOTIyMjo2OjdmNTk6NTc0NzM1MDMyZGRhN2Y3ZjMxYzlhMjY4Mzc3ZGY2OTZlMzRiYzg5NDYxMTQzNjFkNzc4ZTg4MmNhOGNhYmZhZjpo0lQ” (*Cliff Bargar, June 8, 2022, [I-Bargar-2]*; the following commenters provided the same comment: *I-Boudreau-2, I-Fruchtman-2, I-Ivan-2, I-Kanter-2, I-Randecker-2, and I-Webb-2*)

“CAL ISO states that there may be energy shortages during intense weather conditions. These intense weather conditions are expected to worsen in the future.

The city has been identified as an urban heat island. Increased development and loss of open space is expected to make the urban heat island effect worse.

Even currently, the city is underprotected by its emergency fire-fighting water system from catastrophic fires similar to those after the 1906 earthquake.

Has the issue of carrying capacity even been addressed?” (*Eileen Boken, June 9, 2022, [I-Boken-2]*)

“I support Professor Chris Elmendorf’s comments on the DEIR:

https://drive.google.com/file/d/10pIS1Sd6T7FdKBkgd5DD1MbOsEnJgbE1/view____.YXAzOnNmZHqYOmE6bzphMjU4MTM3ZjcwOWUyYmQ3YzVlY2U4OWUyYTNhZjc5OTI2ZjU6NDYyZmYzE0OGI0NjgyYWIwNDNkY2EzZmQ1MGJkMjg4MjYzE3MzBjM2I1OTNkN2lyZjE1ODUxZjEyNDJlMjRkNzpo0lQ” (*Jonathan*

Bunemann, June 7, 2022, [I-Bunemann-2]; the following commenters provided the same comment: I-DiMento-2, I-Kattouw-2, I-Marzo-2, I-Perla-2, I-Vijayaraghavan-2, and I-Whitfield-2)

“I urge you to read the DEIR comments written by Professor Chris Elmendorf:

https://drive.google.com/file/d/10pIS1Sd6T7FdKBkgd5DD1MbOsEnJgbE1/view___YXAZOn

NmZHQyOmE6bzphMjU4MTM3ZjcwOWUyYmQ3YzVlY2U4OWUyYTNhZjc5OT02Om11ZjU6NDBmYzE0OGI0NjgyYWIwNDNkY2EzZmQ1MGJkMjk4MjlxYzE3MzBjM2I1OTNkN2lyZjE1ODUxZjEyNDJlMjRkNzpo0lQ” (*Michael Chen, June 8, 2022, [I-Chen-4]; the following commenters provided the same comment: I-Damerdji-2, I-Day-2, I-Federman-2, I-Frankel-2, I-Kaplan-2, I-Lee-2, I-Munoz-2, I-Powell-2, I-Russell-2, I-Subin-2, I-Tyburski-, and I-Watson-2)*

“I urge you to address the comments made by UC Davis Professor Chris Elmendorf in his analysis of the draft EIR:

https://drive.google.com/file/d/10pIS1Sd6T7FdKBkgd5DD1MbOsEnJgbE1/view___YXAZOn

NmZHQyOmE6bzphMjU4MTM3ZjcwOWUyYmQ3YzVlY2U4OWUyYTNhZjc5OT02Om11ZjU6NDBmYzE0OGI0NjgyYWIwNDNkY2EzZmQ1MGJkMjk4MjlxYzE3MzBjM2I1OTNkN2lyZjE1ODUxZjEyNDJlMjRkNzpo0lQ” (*Bobak Esfandiari, June 8, 2022, [I-Esfandiari-2]; the following commenter provided the same comment: I-Johnson-2)*

“The infrastructure to support this plan needs to be thoroughly reviewed and a plan to support projected housing development and have a realistic timeline.” (*Linda Glick, July 11, 2022, [I-Glick-3]*)

“This is my initial response here. 1. Another spot on Doc, 2. Received the hard copy last night. My quick overview here meets today's requirement for the "adacecy(?) of this DEIR and I'm satisfied with this Draft DEIR. dated 4/20/2022, both Vols I and II, and will continue reviewing it for my comments due on June 21th.” (*Dennis Hong, June 9, 2022, [I-Hong-1]*)

“It is one thing to increase height limits on major corridors like Geary, and another to increase them on side streets. These neighborhoods do not have the infrastructure to support that kind of widespread density.” (*Laura Kline, June 17, 2022, [I-Kline-2]; the following commenter provided the same comment: I-Kline_2-2)*

“The infrastructure on the West Side – roads, parking, recreation facilities, wastewater, etc. – are not adequate to support the proposed changes.” (*David Mahoney, June 18, 2022, [I-Mahoney-3]*)

“Further, the West Side does not have the infrastructure to bear the burden of the proposed development. Responsible planning should ensure that the investment in infrastructure is made as a condition to adding

densification. Doing so in reverse is doing a disservice to the entire resident population of the West Side.”
(Shannon and Shawn O'Neill, July 10, 2022, [I-O'Neill-4]; the following commenters provided the same comment: I-Greenfield-4 and I-Pressman-4)

RESPONSE GC (CEQA)-1

These general comments are in regard to the adequacy of the EIR, the capacity of existing infrastructure to support future growth in the city, and the carrying capacity of the city; they seek clarification about the impact determinations as well as the mitigation for impacts related to transportation and utilities and service systems. The comments do not present specific examples or substantial evidence as to how the EIR is inadequate. The comments are general and do not present new information that would require changes or updates to the analysis provided in the EIR.

Specific comments related to the adequacy of the information and analysis in the EIR are addressed in the responses under each topical subsection. Pursuant to CEQA Guidelines section 15088(c), general comments that do not contain or specifically reference readily available information may receive a general response. These comments, in and of themselves, do not raise specific environmental issues about the adequacy or accuracy of the draft EIR's coverage of physical environmental impacts. Thus, these comments do not require more than a general response in this RTC document.

This general response is organized as follows:

- Significant and Unavoidable Impacts
- Impacts on Infrastructure/Carrying Capacity³⁴
- Adequacy of the EIR

Significant and Unavoidable Impacts

The EIR identifies significant impacts that would result from reasonably foreseeable actions consistent with the proposed action (see draft EIR Chapter 4, Environmental Setting and Impacts). Table S-1 on pp. S-7 to S-88 summarizes the proposed action's impacts and mitigation measures.

- Significant impacts would be reduced to a less-than-significant level with implementation of mitigation measures for the following topics: cultural resources (archeology and human remains), tribal cultural resources, recreation, public services, noise and vibration (groundborne vibration), air quality (construction air quality), utilities and service systems (electronic power or telecommunication facilities), and geology and soils (paleontological resources).

³⁴ *Carrying capacity* is defined here as the number of people, other living organisms, or crops that a region can support without environmental degradation.

- Significant impacts would remain significant and unavoidable, even with implementation of mitigation measures, for the following topics: cultural resources (project-level and cumulative: built-environment historic resources), transportation and circulation (project-level and cumulative: transit delay and loading), noise (project-level: construction noise, operational noise; cumulative: construction noise), air quality (project-level: criteria pollutants; project-level and cumulative: exposure of sensitive receptors to substantial levels of fine particulate matter and toxic air contaminants), wind, shadow, and utilities and service systems (wastewater facilities). The mitigation measures for some of these topics could reduce impacts to less-than-significant-levels, but the draft EIR conservatively determined the impacts to be significant and unavoidable because of the uncertainty regarding implementation of the mitigation.
- Significant impacts would remain significant and unavoidable where mitigation is not feasible for the following topics: transportation and circulation (project-level and cumulative: construction) and utilities and service systems (water supply). These impacts are discussed on draft EIR p. 4-4-92 and p. 4.9-27-28, respectively.

An EIR is an informational document. CEQA does not prohibit lead agencies from approving projects with significant and unavoidable impacts on the environment. According to CEQA Guidelines section 15043, a public agency may approve a project that would cause a significant effect on the environment if the agency makes a fully informed and publicly disclosed decision and determines that (a) there is no feasible way to lessen or avoid the significant effect and (b) the specifically identified expected benefits from the project outweigh the policy of reducing or avoiding the significant environmental impacts of the project. The agency must set forth the reasons for its action in a Statement of Overriding Considerations that is based on the final EIR or other information in the record (Public Resources Code section 21081(b)).

Impacts on Infrastructure/Carrying Capacity

Ensuring that there is adequate utility and infrastructure capacity to serve existing and future development is primarily a planning and policy consideration. CEQA is concerned with the environmental effects of constructing new or expanded infrastructure if existing or future capacity deficiencies are identified. Therefore, for the purpose of CEQA, a proposed action would have a significant effect if it would result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, to maintain acceptable service ratios, response times, or other performance objectives for any public services, including those related to recreation. The potential for the proposed action to result in reasonably foreseeable impacts related to public services infrastructure, including recreational facilities, schools, and libraries, is analyzed under “Public Services” in draft EIR Section 4.1, Effects Found Not to Be Significant. Draft EIR Section 4.4, Transportation and Circulation, analyzes the impact of the proposed action on transportation facilities; draft EIR Section 4.9, Utilities and Service Systems, analyzes the impact of the proposed action on the need for water, wastewater, stormwater, telecommunications, natural gas, and/or electric facilities. Overall, as described in the draft EIR in each respective topic section, public service agencies would evaluate the need for infrastructure upgrades on an ongoing basis and propose new or expanded facilities, as needed, based on the anticipated demand at the time. For example, the San Francisco Fire Department conducts ongoing

assessments of its service capacity and response times to determine where there is a need for additional facilities and would continue to do so in response to projected citywide growth under the housing element update. Consequently, it is not possible to identify project-specific impacts and mitigation measures with certainty at this time because the scope of these future projects is unknown. However, based on available information and review of CEQA environmental documents from similar projects, the department anticipates that potential significant impacts resulting from the construction of new or expanded infrastructure would most likely be reduced to a less-than-significant level with implementation of mitigation measures. Examples of such mitigation measures are identified in the draft EIR under each respective topic section.

For more information regarding the draft EIR's analysis of infrastructure, including the timing of construction in relation to future population growth and development consistent with the proposed action, please refer to Response ENS-6 for a discussion of public services, Response UT-1 for a discussion of the water supply, Response UT-2 for a discussion of wastewater, and Response UT-3 for a discussion of the Emergency Firefighting Water System.

Regarding the comment that provides a list of environmental concerns, as well as one regarding air quality and wildfires, the EIR provides an adequate analysis of environmental topics from the housing element update, including the identified concerns. Please refer to the following sections of the draft EIR:

- Section 4.1: Effects Found Not to Be Significant³⁵
- Section 4.2: Cultural Resources
- Section 4.3: Tribal Cultural Resources
- Section 4.4: Transportation and Circulation
- Section 4.6: Air Quality (wildfire frequency)
- Section 4.7: Wind
- Section 4.8: Shadow
- Section 5A: Growth-Inducing Impacts

In addition, please refer to Response CR-1 for a discussion of built-environment historic resources, Response TR-1 for a discussion of VMT impacts, Response TR-2 for a discussion of safety, Response TR-3 for a discussion of parking, Response WI-1 for a discussion of the approach to the wind analysis, and Response SH-1 for a discussion of the approach to the shadow analysis.

³⁵ Wildfire Hazard Zone applicability is discussed under the "Not Applicable" sub header on draft EIR p. 4.1-233.

Adequacy of the EIR

General comments on the adequacy of the EIR, in and of themselves, do not raise specific environmental issues about the adequacy or accuracy of the draft EIR's coverage of physical environmental impacts. Thus, these comments do not require a response in this RTC document under CEQA Guidelines section 15088(c).

Several comments express support for the comment letter submitted by Christopher Elmendorf on May 10, 2022 (I-Elmendorf). The following list identifies the sections where comments associated with I-Elmendorf are addressed:

- Response PD-1 for a discussion of the assumptions used to inform this program EIR
- Response PD-2 for a discussion of the environmental baseline
- Response ALT-1 for a discussion of the range of alternatives analyzed in the draft EIR
- Response ALT-4 for a discussion of the environmentally superior alternative
- Response GC (NON-CEQA)-4 for further information about the implementation process for the housing element update
- Response TR-1 for a discussion of VMT impacts
- Response ENS-4 for a discussion of GHG impacts

No additional analysis or change to the EIR conclusions regarding this topic is required.

Comment GC (CEQA)-2: CEQA Outreach Process

This response addresses the comments from the commenters listed below; each comment on this topic is quoted in full below this list.

- | | | |
|-----------------|---------------|-------------------|
| • O-JPIA-5 | • I-Hong_2-5 | • I-Underwood_2-1 |
| • I-Cuddeback-1 | • I-Jacobi-1 | • I-Winkler-1 |
| • I-Glick-1 | • I-Robbins-4 | • I-Yamagami-1 |
| • I-Hestor-2 | • I-Storey-1 | |

“Our concern is that this proposal will receive little scrutiny and be rubber stamped for further consideration, as it appears that few are aware of this plan (I certainly wasn't). I have my concerns with the Laurel Heights Improvement Association who indicated that they were previously unaware of this proposal either. I also have shared my concerns with Supervisor Stefani's office. What is equally disconcerting is that until last week's video conference, there has been virtually no discussion about this change with the impacted communities. In a city that claims to value transparency in its government, the fact that this dramatic change is represented solely in a graphic with no other mention in the document is truly appalling.

Jordan Park Improvement Association is strongly against the proposed increase in height limit included in this proposal. We greatly appreciate the Planning Commission extending the comment period by three weeks, to July 12th.” (*Owen Hart, Jordan Park Improvement Association, July 11, 2022, [O-JPIA-5]*)

“I ask your help in leading the way to make the process of review of the Housing Element DEIR much more inclusive. Having such an important document published on a website is not inclusive but left to chance that all interested parties will see it. We need community outreach and input on this report.

1. There has been no open and transparent process and no public hearings whatsoever. No notifications have ever been issued on this subject to the public at large.
 2. Burying such a critical issue within the Planning Department's website is not an open and transparent method of notifying the public, it's quite the opposite-it's opaque and secretive.
 3. No public hearings on what is clearly a once-in-a-generation change to the heights, size, bulk, density as well as the character of neighborhoods have taken place. This needs to be rectified.” (*Linda Glick, July 11, 2022, [I-Glick-1]*)
-

“Having just learned that there is an important plan to change and lessen significantly the height restrictions for buildings in the area around parts of Jordan Park and other neighborhoods, I request a delay of the current June 20 deadline for comment. I have just become aware of this proposed change, and I have not had any chance to review it. I am sure hundreds -if not thousands - of other citizens are in a similar situation. I believe the document is the proposed height limit / zoning changes in the draft EIR Impact Report, Volume 1.

Please extend the deadline for input. This proposal would have a huge, detrimental impact on one of the vital neighborhoods in our city. Certainly, we need to share the load of expanding density, but I need time to understand whether or not this plan, as it is written is too aggressive in that effort.” (*Sam Cuddeback, June 16, 2022, [I-Cuddeback-1]*)

“Second issue: You have already -- we had --pardon me. We should have a few more days to comment. The errata sheet of this EIR is dated May 19th. I said, May 19? That is 20 days before the deadline. And, so that was mailed out on the 31st --” (*Sue Hestor, June 9, 2022, [I-Hestor-2]*)

“This DEIR is bit more unique, only because as most DEIRs are directed to a specific bldg and not a city wide one size fits all City General/Master Plan. Sort of a project by project, so a NOP might not be used in this case. (??). I only knew of this DEIR because I have been tracking these DEIR etc. and was requested to respond to specific cases.” (*Dennis Hong, July 11, 2022, [I-Hong_2-5]*)

“To the supervisor, Legislative Aide and members of the Planning Department:

I am the owner of the two units at 41 and 43 Lupine. We are very concerned about any action taken to develop the area, increase density, and change allowable heights in our neighborhood.

I believe the public has a right to weigh in on the entire Plan/Draft EIR within the context of an open, transparent, Public Outreach process that reaches all the neighborhoods. Anything less is a biased, opaque attempt to avoid any and all input and responsibility.

The July 12th cutoff for public comment needs to be withdrawn and rescheduled for a date AFTER the Planning Department has conducted a thorough, thoughtful and professional Public Outreach that includes all the neighborhoods impacted.” (*Mary Jacobi, July 11, 2022, [I-Jacobi-1]*)

“The Housing Element Draft EIR is based on a Process that is flawed, opaque, secretive and absent any public outreach program whatsoever.

On behalf of all the homeowners and residents of the Geary St. Corridor, I appeal for more information and PROTECTION for residents such as myself who are more DIRECTLY impacted by the 85 foot height and density proposals.” (*Sallie Robbins, July 2, 2022, [I-Robbins-4]*)

“I just learned that there is an important plan to change and lessen significantly the height restrictions for buildings in the area around parts of Jordan Park and other neighborhoods, I request a delay of the current June 20 deadline for comment. I have had no warning of this proposed change, and I have not had any chance to review it. I am sure most other residents are in a similar situation. I believe the document is the proposed height limit / zoning changes in the draft EIR Impact Report, Volume 1.

Please extend the deadline for input. This proposal would have a huge, detrimental impact on one of the vital neighborhoods in our city. Certainly, we need to share the load of expanding density, but I need time to understand whether or not this plan, as it is written is too aggressive in that effort.” (*Meg Storey, June 17, 2022, [I-Storey-1]*)

“I heard several area neighbors express their despair over repeatedly not hearing about local projects as well as impactful decisions under consideration by the Planning Department like those discussed today. They have been very much involved with the review of projects ultimately approved by the Planning Department already. The suggesting that a distribution list of the neighborhood district associations primary contacts be created at your office to open the lines of communication when it is too early to trigger the “official” notice requirements but, nonetheless of concern while under review and consideration. We look forward to more dialogues such as

we engaged in today on potentially impactful property related matters under review by your department.”
(Victoria Underwood, July 8, 2022, [I-Underwood_2-1])

“Why did the Planning Department bury the notification of this monstrous plan to change our City on page 154 of the Draft EIR? The neighborhoods affected should have been notified by mail at the very least. What happened to honest and transparent Public Outreach to the citizens of San Francisco? As a tax-paying resident, I believe it is only just, that given the enormity of this project, which will affect at a minimum, the next three decades of this city’s existence, San Franciscans should be given the opportunity to voice their questions and concerns in an open forum – not buried in an email in someone’s queue.

The July 12th deadline for public comment needs to be rescheduled for a future date AFTER the Planning Department has conducted a thorough Public Outreach effort that includes all citizens affected by this project.”
(Calla Winkler, July 10, 2022, [I-Winkler-1])

“We are requesting an extension, as this element of the study has not been adequately disclosed to San Francisco’s neighborhood associations and citizens.” *(Dick & Jan Yamagami, June 17, 2022, [I-Yamagami-1])*

RESPONSE GC (CEQA)-2

The majority of comments seek clarification on the CEQA outreach process and request an extension of the draft EIR comment period.

Several commenters incorrectly state the proposed action itself would result in zoning changes. Refer to Response PD-1 for a discussion of the assumptions used to inform this program EIR.

As described below, the department met CEQA requirements for public review notice and comment periods. The department also extended the draft EIR comment period beyond CEQA requirements. No additional analysis or change to the EIR conclusions regarding this topic is required.

This response is organized as follows:

- Notice of Preparation of EIR and Public Scoping Meeting
- Draft EIR
- Draft EIR Comment Period Extension

Notice of Preparation of EIR and Public Scoping Meeting

The environmental review process, including the notice of preparation of an EIR and scoping meeting (NOP) process, is described under “C. Environmental Review Process” on draft EIR pp. 1-4 through 1-10. The department published an NOP on June 16, 2021 (included as Appendix A in EIR Volume II); held a virtual scoping

meeting on June 29, 2021; and requested comments by July 16, 2021. This 30-day comment period is consistent with CEQA Guidelines section 15082. A notice of availability of the NOP was sent to the State Clearinghouse, responsible agencies, and interested individuals and organizations. The purpose of the meeting and publication of the NOP was to explain the environmental review process for the proposed action and provide an opportunity to take public comments related to the environmental issues of the housing element update. Comments received during the scoping process were considered in preparation of the EIR (see **draft EIR Table 1-1**, p. 1-5, for a summary of the comments received on the NOP). The environmental review process, including the NOP and scoping meeting process, is described under “C. Environmental Review Process” on draft EIR pp. 1-4 through 1-10.

As part of the scoping process, the department translated the notice of availability into Chinese, Filipino, Russian, Spanish, and Vietnamese. The department also translated the pre-recorded scoping meeting presentation explaining the proposed action and CEQA process into Chinese, Filipino, and Spanish. All translated materials/links were posted to the department’s environmental review website.

Draft EIR

The planning department published the draft EIR on April 20, 2022, and originally requested comments by June 20, 2022 (see below for details regarding the comment period extension). This 62-day comment period is consistent with CEQA Guidelines section 15105, and the distribution described below is consistent with CEQA Guidelines sections 15086 and 15087. A planning commission hearing to receive comments on the draft EIR occurred on June 9, 2022.

The planning department posted the draft EIR to the planning department’s environmental review website and advertised the draft EIR on a banner located on the planning department’s home page. The planning department also distributed the notice of availability of the draft EIR electronically by email to recipients who provided email addresses or commented on the NOP; published the notice of availability of the draft EIR in the *San Francisco Examiner* on April 20, 2022; sent the notice of availability of the draft EIR to the State Clearinghouse; posted the notice of availability of the draft EIR at the San Francisco County Clerk’s office; and sent copies of the notice of availability of the draft EIR to individuals who previously requested such notice as well as public libraries and recreational centers in San Francisco for posting. The department also translated the notice of availability of the draft EIR into Spanish, Chinese, and Filipino and posted it to the department’s environmental review website. The department also provided translated notices to public libraries and recreational centers for posting.

The department maintains a list it uses to distribute planning project notifications to individuals and neighborhood groups that have expressed interest in receiving such notices. Individuals and organizations can register and obtain a complete list of registered neighborhood groups, along with their contact details, at <https://sfplanning.org/resource/neighborhood-group-organizations>. The website contains a link to a [neighborhood group notification form](#), which must be filled out and emailed to planningnews@sfgov.org. It takes approximately two to four weeks to start receiving notices.

Several commenters allege that Jordan Park residents did not receive a notification regarding the proposed project. The Jordan Park Improvement Association is a registered neighborhood group on the department's distribution list and the association's designated representative was sent a physical copy of department notices, per the preference indicated on the neighborhood group notification form.

The department provided paper copies of the EIR for public review at the following locations: (1) San Francisco Planning Department, Planning Information Counter, 49 South Van Ness Avenue, and (2) San Francisco Main Library, 100 Larkin Street. Electronic copies of the EIR were also available for review or download on the department's web page (<https://sfplanning.org/environmental-review-documents>). Hard copies of the document were mailed to individuals who requested physical copies.

A description of the public review of the draft EIR is provided under "Public Review of the Environmental Impact Report" on draft EIR pp. 1-8 and 1-9.

Refer to Response GC (NON-CEQA)-3 for a discussion of the community outreach process related to the housing element update.

Draft EIR Comment Period Extension

As discussed above, the planning department published the draft EIR on April 20, 2022, and requested comments by June 20, 2022, a public review period of 62 days. On June 16, 2022 in response to requests for an extension of the comment period, the department extended the comment period to July 12, 2022 (for a total of 83 days).

Comment GC (CEQA)-3: Environmental Review for Future Actions Consistent with the Housing Element 2022 Update

This response addresses the comments from the commenters listed below; each comment on this topic is quoted in full below this list.

- O-JTF-3
- O-JTF-7
- O-JTF-9

"Elimination of Community Engagement – Japantown is designated as a potential Housing Sustainability District which could result in ministerial approvals for projects that meet the 20% affordable unit benchmarks. This would presumably supplant any community engagement for potentially significant development and impacts, stripping the community of any self-determination." (*Emily Murase, Japantown Task Force, June 21, 2022, [O-JTF-3]*)

“How would the Housing Sustainability District considered for Japantown be applied to future housing development? Would the 20% affordability requirement be applied to NEW housing development? The proposed 20% seems to be too low, especially given the disproportionate impacts on Japantown, the forced removal of Japanese Americans from Japantown, and the subsequent loss of generational wealth resulting from displacement caused by governmental actions.” (*Emily Murase, Japantown Task Force, June 21, 2022, [O-JTF-7]*)

“The City should take a very rigorous and diligent approach with property owners/developers who want to change Japantown’s historic and cultural assets. The community should be informed and involved early in the planning and design process, so that important historic and cultural assets in Japantown be preserved for future generations. Property owners/developers should work together with the community on height, density, location, as well as air quality, noise, vibration, water, power, and health impacts on the community.” (*Emily Murase, June 21, 2022, [O-JTF-9]*)

RESPONSE GC (CEQA)-3

These comments are concerned with possible housing sustainability district designation and what the outreach process would be, particularly in Japantown. As discussed under “D. Intended Uses of This EIR” on draft EIR p. 1-10, CEQA Guidelines section 15168(c) states that when a program EIR has been prepared, subsequent activities in a program must be examined in light of the program EIR to determine whether additional environmental review is necessary. When future actions are proposed, the department would evaluate those actions, as applicable, to determine if there would be any new or more severe impacts than those identified in the draft EIR. Refer to Response ENS-1 for a discussion of the less-than-significant land use (specifically related to the division of neighborhoods) impacts under the proposed action. In addition, refer to Response CR-1 for a discussion of the significant and unavoidable impacts on built-environment historic resources under the proposed action, even with implementation of mitigation measures. Finally, refer to Response SH-1 for a discussion of the significant and unavoidable shadow impacts under the proposed action, even with implementation of mitigation measures.

Regarding the comments about housing sustainability districts, one foreseeable future outcome of the housing element update could be the designation of one or more of the areas identified in **draft EIR Figure 2-8**, p. 2-28, as a housing sustainability district. Under California Government Code sections 66200 through 66210, designations of these areas as housing sustainability districts could be used to streamline the environmental review and approval of residential development projects, as discussed under “Housing Sustainability Districts” on draft EIR p. 2-27. Housing sustainability districts must be adopted by ordinance. No specific housing sustainability districts are proposed as part of the housing element update, but the EIR identifies where such districts may be considered in the future. **Draft EIR Figure 2-8** identifies the areas that could be included in possible housing sustainability districts. As shown, Japantown is one of the areas of the city that could be included in possible housing sustainability districts in the future. Subsequent to the publication and circulation of the draft EIR, minor

revisions were made to areas under consideration for possibly housing sustainability districts shown in **draft EIR Figure 2-8**; the revised figure is included in RTC Chapter 5, EIR Revisions.

Pursuant to California Government Code sections 66202 to 66210 and CEQA sections 21155.10 and 21155.11, subsequent projects in designated housing sustainability district areas that meet the requirements of a housing sustainability district would not require further environmental review but would be required to implement applicable mitigation measures determined to be necessary to reduce significant impacts identified in the housing sustainability district EIR. As a hypothetical example, a proposed 60-foot-tall building in a housing sustainability district that contains two below grade levels and is adjacent to a publicly accessible open space would be required to comply with mitigation measures M-CR-2a. Procedures for Discovery of Archeological Resources for Projects Involving Soil Disturbance and M-SH-1: Shadow Minimization. These mitigation measures would apply to the project as it involves soil disturbance (and therefore has the potential to disturb archeological resources) and given the height of the building, has the potential to cast shadow on a publicly accessible open space. This is not an exhaustive list of the mitigation measures that could potentially apply to the hypothetical project but these are two examples of requirements (mitigation measures) that a project located in a housing sustainability district would need to comply with to qualify for streamlined review and approval.

The outreach process related to possible housing sustainability districts would occur as part of outreach for housing element implementation. As noted, adoption of a housing sustainability district would occur only after outreach to the affected neighborhood, introduction of an ordinance for adopting controls for the district, review by the planning commission at one or more public hearings, and adoption by the board of supervisors.

L. General (Non-CEQA)

The comments and corresponding responses in this section cover general issues not related to substantive environmental issues or CEQA. These include topics related to:

- GC (NON-CEQA)-1: Not a Comment on the Draft EIR
- GC (NON-CEQA)-2: Project Merits
- GC (NON-CEQA)-3: Community Outreach Process
- GC (NON-CEQA)-4: Implementation Process

Comment GC (NON-CEQA)-1: Not a Comment on the Draft EIR

This response addresses the comments from the commenters listed below; each comment on this topic is quoted in full below this list.

- | | | |
|-----------|--------------|---------------|
| • O-CHA-3 | • I-Hong_2-2 | • I-Truong-2 |
| • O-EJA-2 | • I-Hong_2-4 | • I-Welborn-1 |

- O-SPEAK-7
- I-Hong_2-7
- I-Boken-3
- I-Roberson_2-2

“Increasing the height to 65 feet along these two streets would create a dark canyon of high buildings and block the light and air for residents and visitors alike.” (*Lori Brooke, July 12, 2022, [O-CHA-3]*)

“As the previous speakers have spoken, you keep buying, you keep building market-rate housing because you lie in the pockets of the developers. In other words, you are forced into corruption.

Now, if you look at rental housing or affordable housing, thousands of those units were demolished or changes made by the Academy of Arts University. You don't know what the hell I am talking about.

We fought and you initially the planning department confronted us. It took us 18 years, but we lost the housing. The army built thousands of housing, affordable housing. [indiscernible]” (*Francisco Da Costa, Environmental Justice Advocacy, June 9, 2022, [O-EJA-2]*)

“San Francisco is the City of St Francis. This should inform strategies of the Housing Element.

Could the quality of life in San Francisco be degraded by the strategies in the Housing Element?

PUBLIC HEALTH

Could public health be degraded by increases in contagious diseases due to pack and stack?

Could boil water alerts increase due to algae blooms?

San Francisco has already been declared an urban heat island. Refer to link below. Less mid block open space could intensify this.

<https://url.avanan.click/v2/> <https://www.google.com/amp/s/abc7news.com/amp/san-francisco-weather-climate-central-report-urban-heat-island-summer/10957576/.YXAzOnNmZHqYOmE6bzo1MTdkMjU5NmYwOGFkY2E4NmI2N2FiOWExNzkzOWQ2ZDo2OmRiZWm6YzJkODQ1MDIIMWE3MmY4Yzk5MmJiMjFkZmQzNGQ0MzMwZDgzNTE2ZmRmNDY3NjU5ODQzOGUzYzE4NTI5NmFiodp0OkY>

Air quality could be degraded for a number of reasons e.g. the day the sky turned orange.

Demolition and disposal of old construction as well as the resource extraction and deforestation of materials for new construction can take up to 30 years to create a carbon offset.

Reduction of tree canopies could reduce air quality. PUBLIC SAFETY

Could evacuation routes for earthquakes and fires be overwhelmed as they are designed for a lower density?

Could urban wildfires increase in the City's heavily wooded areas?

Could SoMa's sinking accelerate with high rise construction as this area is marshlands?" (*Eileen Boken, Sunset-Parkside Education and Action Committee, July 11, 2022, [O-SPEAK-7]*)

"Some have called the new RHNA numbers aspirational. Others have said they are intentionally unachievable because new methodology used by --- based on SB 828 by Scott Weiner. Even the state auditor has found the HCD methodology to be flawed.

In the past net RHNA numbers have no consequences. Now they have serious consequences based on SB 35 by Scott Wiener. These consequences could include fines, penalties and even by-right approvals.

Some have said the cities are being set up for failure, and as my prophecy states, in the end time there will be no secrets." (*Eileen Boken, June 9, 2022, [I-Boken-3]*)

"Can a separate map showing all of the BoS district be added. not sure if this www works: <https://sfelections.sfgov.org/maps> This revised map might make it easier to follow." (*Dennis Hong, July 11, 2022, [I-Hong_2-2]*)

"Can there be a chart and or a list of definitions showing what is Affordable, qualifications to meet for these units. i.e., what is BMR, Market rate etc.. This too is a never ending. But, just as an informational item." (*Dennis Hong, July 11, 2022, [I-Hong_2-4]*)

"I have been reviewing the massive Two volume DEIR Case No. 2021060358 - of April 20, 2022. I have reviewed it as a professional working doc or a live doc, only because of the never ending changes due to the following but not limited to; City, federal legislation, State Mandates and etc.

Again, in my opinion; this Doc should be like a working doc due to all the ongoing comments from Residents to the SFBoS, other changes, i.e. an example shown in item A (cut and paste) below. New legislation, etc..

A. 220792 [Petitions and Communications] Petitions and Communications received from June 23, 2022, through July 7, 2022, for reference by the President to Committee considering related matters, or to be ordered filed by the Clerk on July 12, 2022:

From Paulina Fayer, regarding a Charter Amendment to amend the Charter of the City and County of San Francisco to provide for accelerated review and approval of eligible 100% affordable housing projects. File No. 20631. Copy: Each Supervisor. (48) From Anastasia Yovanopoulos, regarding a proposed Ordinance amending the Planning Code to create the Group Housing Special Use District. File No. 211300. Copy: Each Supervisor. (49)

From Anastasia Glikstern, regarding the Planning and Funding Committee meeting on July 5, 2022. Copy: Each Supervisor. (50)” (*Dennis Hong, July 11, 2022, [I-Hong_2-7]*)

“Turning to current events, COVID has clearly, and perhaps permanently, reduced the need for people to work or be downtown at all. SF Schools have experienced declining enrollment by around 3,500 students. Compass Realty’s June report said that housing values are decreasing due to interest rate fears. Investing in real estate now is risky. SF Muni has fewer riders now – only 54% of weekday pre-pandemic ridership. As a city, we are reducing for the foreseeable future. The contraction will not last forever – of course. What specific language in the Housing Element’s development goals recognize scale for BOTH contracting or expanding local economy?” (*Kelly Roberson, July 8, 2022, [I-Roberson_2-2]*)

“Furthermore, we need to remove veto points that can be used to block housing. The housing element’s analysis of fair housing points out that neighborhood opposition contributes to our scarcity of fair housing. Just look at the proposed affordable housing project at 2550 Irving, where neighbors sued to stop the first proposed affordable housing project in the Sunset District. Exclusionary neighborhoods will use any tools available to avoid change. To comply with our legal and ethical duty to affirmatively further fair housing, the city needs to remove veto points (like discretionary review and conditional use authorization) that are used by NIMBYs to stop housing.” (*Justin Truong, June 28, 2022, [I-Truong-2]*)

“You know, 500 pages, and what can you say? The idea that we can build 5,000 units a year in San Francisco is ridiculous. It has never happened, and it will not happen without funding.

So, the alternative to the proposed project must be explored further. I especially want to say that building housing, affordable housing, and I mean here, affordable to the people who are earning or who have income of 20 to 80 percent of AMI, which is about half of our city, must be what’s built first.

It is a proven fact that trickle-down housing does not work. We know from nexus studies again that every market-rate housing of 100 units that are built needs about 30 units of affordable housing just to support those 100 units of market-rate housing, assuming, of course, that those are actually occupied as opposed to merely investment properties.

So, a lot to be said more about this, but if it is not workable, and it is partly not workable because you have chosen not to buck the RHNA goals, which are ridiculous.” (*Tess Welborn, June 9, 2022, [I-Welborn-1]*)

RESPONSE GC (NON-CEQA)-1

Several comments are general comments unrelated to CEQA or unrelated to the topics studied in the CEQA Guidelines Appendix G checklist. Some comments suggest adding additional information unrelated to

environmental impact analysis. Others are general concerns regarding the proposed action or the analysis in the EIR but do not identify any particular deficiencies in the analysis or conclusions of the EIR regarding the physical environmental impacts of the proposed action. Other comments are introductory in nature or do not present specific issues related to the proposed action or the EIR.

Pursuant to CEQA Guidelines section 15088(c), general comments that do not contain or specifically reference readily available information may receive a general response. These comments, in and of themselves, do not raise specific environmental issues about the adequacy or accuracy of the draft EIR's coverage of physical environmental impacts. Thus, these comments do not require a response in this RTC document under CEQA Guidelines section 15088(c).

No additional analysis or change to the EIR conclusions regarding this topic is required. These comments will be transmitted to city decision makers for their consideration during the proposed action's approval process.

For informational purposes, regarding the comment expressing concerns about recent legislation related to housing, refer to Response PP-1 for a discussion of recently approved plans and policies in the city. Regarding the comment expressing concerns about the RHNA assumptions, refer to Response PD-2 for a discussion of the environmental baseline, including a comparison of the RHNA and EIR projections. Regarding the comment that provides a list of environmental concerns, the EIR provides an adequate analysis of all environmental topics, including the identified concerns. In addition, refer to Response GC (CEQA)-1 for a summary of the potential environmental impacts of future development consistent with the housing element update.

Comment GC (NON-CEQA)-2: Project Merits

This response addresses the comments from the commenters listed below. Out of the 56 individual comments, 42 comments are unique and are therefore quoted in full below this list. Where the same comment is made by a number of individuals, the text is provided verbatim but not repeated multiple times. The names of the individuals who made the same comment are provided following the comment. Complete letters, emails, and the transcript are provided in full in Attachments 1 and 2 of this RTC document.

- | | | |
|-----------------|----------------|------------------|
| • A-Diamond-1 | • I-Ed-1 | • I-Mogannam-1 |
| • A-Diamond_2-4 | • I-Eisler,J-1 | • I-Nakahara_2-1 |
| • A-Moore-1 | • I-Eisler,M-1 | • I-Nakahara_2-2 |
| • A-Moore-9 | • I-Gauss-1 | • I-Nakahara-1 |
| • O-CHA-1 | • I-Golden,J-1 | • I-O'Neill-1 |
| • O-CHA-1 | • I-Hart-1 | • I-Paul,J_2-1 |
| • O-GGVNA-1 | • I-Howell-1 | • I-Paul,J_3-1 |
| • O-JTF-2 | • I-Keller-1 | • I-Paul,J-1 |

- | | | |
|-------------------|------------------|-------------------|
| • O-JTF-4 | • I-Kline-1 | • I-Paul,M_1 |
| • O-REP_3-2 | • I-Kline-3 | • I-Pressman-1 |
| • O-REP_3-6 | • I-Kline_2-1 | • I-Pressman-5 |
| • O-SOMCAN-1 | • I-Kline_2-3 | • I-Resnansky-1 |
| • O-SPEAK-1 | • I-Madsen-1 | • I-Resnansky-3 |
| • O-SPEAK-10 | • I-Mahoney-1 | • I-Schember-1 |
| • O-YCD-1I-Adam-1 | • I-Mahoney-4 | • I-Titus-1 |
| • I-Arora-1 | • I-Marks-4 | • I-Truong-1 |
| • I-Bratun-Glen | • I-Marks_2-1 | • I-Underwood_2-4 |
| • I-Burns-1 | • I-Martin-1 | • I-Weinberg-1 |
| • I-Chong,RB-1 | • I-Massenburg-1 | |

“So the first one is that the EIR states in several places that the proposed action represents one possible distribution of future housing development growth, and we could end up with zoning changes that are somewhat different than what's shown in the proposed action.

In particular, while several of the major commercial corridors are appropriately raised to 85 feet, as I previously stated in these hearings I disagree with the policy of increasing the residential side streets to 85 feet -- because that's roughly the equivalent of adding 4 to 6 stories of height on top of the existing 2- to 3-story housing stock on those streets.

It makes a great deal of sense to me to increase the height limits on the side streets to 55 feet or in some cases 65 feet. But I think raising the height limit on the side streets to 85 feet is unnecessarily disruptive and too massive a shift in character.

So, consequently we are not making the decision today about the recommended zone changes or height changes, but I wanted to make sure that the EIR is broad enough to cover proposed rezonings and height changes that maintain or even increase 85 feet along the commercial strips, but step down the proposed 85-foot zone on those residential side streets to 65 or 55 feet.

And if necessary, the units lost by that height decrease should be moved elsewhere on the west side, like for example, increasing commercial corridors to higher than 65 feet.

Some of the corridors are only at 65 feet and maybe those should be raised at 85 feet, and some of the side streets that are only at 40 feet could instead be raised to 55 or those that are 55 should be raised to 65 feet.

So it's really is a comment and concern to make sure that the draft EIR is broad enough to cover zone changes that aren't exactly what's proposed in the EIR but are in character with it but shift around some of that density and height.” (*Sue Diamond, Planning Commission, June 9, 2022, [A-Diamond-1]*)

“The EIR states in multiple places that the proposed action represents one possible distribution of future housing development growth and that we may end up with zoning changes that reflect somewhat different zoning/height patterns than shown in the proposed action. While several major commercial corridors are appropriately raised to 85’, as I have previously stated, I disagree with that policy of increasing the residential side streets to 85’ which is roughly equivalent to adding 4-6 stories of height on top of the existing 2-3 story housing stock on the side streets. It makes sense to me to increase the height limits on the side streets to 55’ or in some cases 65’, but I think raising the limit to 85’ on the side streets is unnecessarily disruptive and too massive a shift in character. Consequently, I would like to make sure the EIR is broad enough to cover proposed rezonings and height changes that maintain or increase the 85’ along the commercial stripes but step down the proposed 85’ zone on these residential side streets to 65’ or 55’. If necessary, the units lost by that height decrease could be moved elsewhere on the west side by, for example, increasing the commercial corridors to higher than 85’, increasing other commercial corridors to 85’ that are now only at 65’ or increasing side streets heights that are at 40’ to 55’ or at 55’ to 65’.” (*Sue Diamond, Planning Commission, July 11, 2022, [A-Diamond_2-4]*)

“The primary objective that I would like to see better highlighted in our Draft EIR is not just the fact that we need more development -- development of any kind, but a clearer emphasis on the production of very low, low, and moderate-income housing.

That falls somewhat by the wayside and the numbers are somewhat overwhelming, but an acknowledgment of the fact that we have fallen further behind not only since 2014 but even before that, I think it is time for us to bite the bullet and create a clearer understanding of what it really takes to meet our housing obligations and housing here and address the significant deficiency in affordable housing in order to stay a viable city, and also dealing with requirements of the housing element, we need to be clearer in how we address that. and that includes listing implementation tools to achieve a better balance.” (*Kathrin Moore, Planning Commission, June 9, 2022, [A-Moore-1]*)

“I would like to have the department comment one more time on the numbers, the RHNA numbers, that were used again. State auditing challenged the RHNA numbers. And in addition to that I would like to see a reflection why San Francisco is reporting a 6.3 drop in population within the last year.

Those are all things that affect our totals, and I think it is the incredible magnitude of numbers that we are dealing with where I would like to see the challenges both by the state audit board or the noted drop in population to be considered.” (*Kathrin Moore, Planning Commission, June 9, 2022, [A-Moore-9]*)

“1. CHA supports your goals to provide affordable housing in San Francisco utilizing Land Use Density and Distribution. In your document, this development would occur in all areas of the city.

2. Our concerns center around increasing height limits on Lombard Street and Union Street in District 2. We support increased density without increasing height limits beyond 40 feet.” (*Lori Brooke, Cow Hollow Association, July 12, 2022, [O-CHA-1]*)

“There is potential to remove older hotels and renovate vacant single story shops on Lombard Street to add dense, multi-family affordable housing. In honoring the Cow Hollow Neighborhood Design Guidelines’ height limits, the Cow Hollow Board will work diligently with nearby neighborhood boards to support adding dense multi-family and affordable housing in the Marina neighborhoods. As importantly, we believe the Planning Department should not change long established zoning limits before it first fully understands and considers the amount of potential housing through current usable vacancies, entitled projects yet to be built, and unbuilt capacity that is within current zoning laws.” (*Lori Brooke, Cow Hollow Association, July 12, 2022, [O-CHA-4]*)

“On page 2-26 of the Report, eleven streets are candidates for development. Two of them in our neighborhood, Union and Lombard, should not be on that list. Criteria for inclusion according to the report are a well resourced area and a transit corridor. These do not apply. Union street has a bus line and retail shops, but so do a hundred other streets in San Francisco. Beyond buses, it does not have a train, streetcar or other transportation and does not qualify as a transit corridor. And it is not more resourced than other commercial avenues. This is the same with Lombard. These streets need to be removed from the list.

Page 2-24 of the report states, “... a foreseeable change in land use could include... increasing allowable height limits along existing and projected rapid network transit corridors..” Increasing height limits along Union and Lombard would be a disaster. It would probably result in 95% of buildings with one height limit, with a few conforming to a second height limit and sticking out. The outcome would be an unattractive, messy pastiche. In addition, this might open the door to demolishing many older buildings. Part of the charm of a street like Union, though, are the distinctive Victorians which house various shops and boutiques. Our old buildings are a valuable resource (and major tourist attraction) and the city needs to hold onto them.” (*Phil Faroudja, Golden Gate Valley Neighborhood Association, June 30, 2022, [O-GGVNA-1]*)

“Singled out for Significant Growth – Of the three Cultural Districts impacted by the DEIR (the others being the Castro and Sunset Chinese Cultural Districts), Japantown is the only community that is expected to absorb massive growth.” (*Emily Murase, Japantown Task Force, June 21, 2022, [O-JTF-2]*)

“At the same time, the Housing Element includes policies that seek to redress harm to the Japanese American community caused by past discriminatory government actions. Our previous comment letter expressed our recognition and support for these policies. However, the above proposals in the DEIR are in direct conflict with the equity-centered values of the Housing Element Update.” (*Emily Murase, Japantown Task Force, June 21, 2022, [O-JTF-4]*)

“Deficiencies of the "Proposed Action"

In describing the "Proposed Action," or the Proposed Project, Planning describes its intention to "shift an increased share of the City and County of San Francisco's (city's) future housing growth to transit corridors and low-density residential districts within well-resourced areas." (Volume 1, p. S-2). However, rather than tackling the issue of affordability, the only question this Housing Element seems to attempt to answer is one of production. As described in the Housing Element, Planning assumes that the equilibrium point where supply and demand curves intersect will be at a price point that most San Franciscans can afford. Unfortunately, as presented in the Housing Element (Volume 1, p. 4.1-63), San Francisco has built more than 1.4 units of housing for every person since 1950, demonstrating clearly that the lack of supply is a myth. Since this overproduction of housing has resulted in a six-fold increase in the cost of housing, clearly, the supply and demand curves are intersecting at a price point that is well out of reach for most San Franciscans.

The recent reports presented to the Board of Supervisors about the high number of vacant units, more than 40,000 units (~10% vacancy rate) underscore these statistics. Despite these production statistics and the continuing propensity of housing prices to escalate faster than the rise in real wages, the overproduction of ever more expensive housing during the current Housing Element cycle, it is hard to understand why Planning continues to focus its intentions and formulate its "Proposed Action" around its misplaced faith in the "housing market" that appears to have no intention or ability to deliver housing that is widely affordable to the majority of San Franciscans who are unable to afford the housing that market rate developers are building.

Increasing the potential yield of units from 102,000 (if the current Housing Element were to remain in place through 2050) to 152,000 with this new Housing Element by 2050 (Volume 1, p. 4.1-90) does not address the imbalance in production by income and affordability. The DEIR acknowledges that the current Housing Element has resulted in gross over production of housing targeted to upper income households while far under producing housing affordable for low to middle income households (Volume II, p. 6-235), but it does nothing with the Proposed Action to correct this imbalance. In fact, the Housing Element relies even more heavily on for-profit, market rate developers by reducing its affordable housing goals from 57% to its newly stated goal which is to build 70% market rate and only 30% below market rate housing over the next thirty years (Volume 1, p. 2-8). This approach simply worsens the already damaging pattern of racial, social and economic imbalance and inequity.

Both the RHNA mandates and San Francisco's Housing Balance program passed by the voters in 2015 establish housing production goals broken down in terms of specific goals for different income levels, to ensure that there is an equitable distribution of housing affordability. When describing "San Francisco Plans and Policies" in

Chapter 3 of the DEIR which starts on Volume 1, p. 3-1, the DEIR fails to mention or make reference to San Francisco's Housing Balance. Not only does the Housing Balance require Planning to "monitor and report bi-annually on the Housing Balance between new market rate housing and new affordable housing production" as the summary states on Planning's website, but "also requires an annual hearing at the Board of Supervisors on strategies for achieving and maintaining the required housing balance in accordance with the City's housing production goals." This quote can be found in the "background" section of the actual Housing Balance reports, the most recent of which is linked here. There, however, are no plans to bring the city's housing stock or development pipeline into balance, and this Housing Element does nothing to address San Francisco's underperformance with respect to this policy.

By approaching the Proposed Action or Proposed Project by focusing high-priced, market rate development on "transit corridors" and "low-density residential districts within well-resourced areas," the Housing Element takes an approach that seeks to provide developers with streamlined opportunities to capitalize on unrealized underlying value from both existing infrastructure and future height and density increases. Transit corridors provide a stable source of escalating land value by the very nature of their transit infrastructure and networks of commercial and pedestrian activity.

Many of San Francisco's transit corridors are homes to low-income and people of color households that will be increasingly vulnerable to gentrification and displacement resulting from the strategies outlined in the "Proposed Action."

Well-resourced areas, or "opportunity areas" as identified by the State of California, are intended to be areas for increased development of 100% affordable housing in order to provide lower income households access to communities that present potential for "positive economic, educational, and health outcomes for low-income families- particularly long-term outcomes for children." As stated in HCD's report, the intent of these opportunity maps is "to accompany new policies aimed at increasing access to high-opportunity areas for families with children in housing financed with 9% Low Income Housing Tax Credits." Targeting also extends to "similar policies in other state funded programs such as HCD's Multifamily Housing Program and the California Debt Limit Allocation Committee's regulations for 4% LIHTC's..." These quotes are from pages 1 and 2 of the "California Fair Housing Task Force, Methodology for the 2022 TCAC/ HCD Opportunity Map, December 2021." These "opportunity areas" are not mapped with the intention of encouraging more high-priced, market rate housing development. Rather they are mapped in order to increase 100% affordable housing development in these areas to provide access for low income households to these areas that have more resources than low income neighborhoods typically have had access to.

Therefore, we find that throughout the Housing Element, there is a lack of planning for equitable outcomes, and there is a lack of disclosure of potentially reduced environmental impacts caused by approaches that would also result in equitable outcomes. The entire focus of the Housing Element appears to be on production of market rate units without prioritization for those who are unable to afford the high-priced housing that market rate developers build. The rationale behind the distribution of development as detailed in the Proposed Action (Proposed Project) is purely based on adding density where there is less density of development. An equitable

distribution of building heights and unit density is purely a strategy for distributing bigger, denser buildings. This is not, however, a strategy that will result in racial, social or economic equity.

For instance, if the production goal for below market rate housing in the current Housing Element cycle was 57%, but the actual production was closer to 20%, then it would follow that this new Housing Element should make every effort to produce enough affordable housing in order to correct for the past deficit, and to meet the future demand for affordable housing. The danger of Planning's approach to exacerbate the deficit of affordable housing is underscored by the findings quoted in Volume I, p. 4. 1-75 from the study about the impacts of market rate housing:

"The highest socio-economic groups move in at higher rates than other groups and move out at lower rates. In other words, the highest socio-economic groups experience disproportionate benefits of new market-rate housing production."

Achieving equity will only be accomplished by committing to deliberate, concrete strategies for achieving equity. Relying on the profit-motivated development sector to provide equitable outcomes through deregulation, which is what this Housing Element does, will only continue to result in greater inequality and displacement. REP-SF advocates an equity solutions framework of Desegregation, Affordability, Culture & Arts, Stability and Sustainability. For this solutions framework to move us toward greater equity, each component must be addressed. Addressing each of these components is what the strategies listed above are intended to do."
(Joseph Smooke, Race & Equity in All Planning Coalition, July 12, 2022, [O-REP_3-2])

"As recommended above, Planning and MOHCD should work collaboratively on an aggressive program to acquire existing apartment buildings in order to stabilize the tenancies and provide permanent affordable housing. This is not just an expeditious program for providing affordable housing. It is also an environmentally superior approach that uses existing buildings rather than building new ones. This DEIR is deficient because it does not study nor disclose the environmental benefits of adaptive reuse and rehabilitation of existing buildings vs the construction of new residential buildings." *(Joseph Smooke, Race & Equity in All Planning Coalition, July 12, 2022, [O-REP_3-6])*

"I urge the planning commission to thoroughly evaluate the impacts and policies that encourage demolition, displacement, and private speculative development will have on our communities and on the environment.

REP envisions and works for planning that puts the expertise of our communities at the forefront to solve issues of displacement, unaffordability, and equality." *(Angelica Cabande, SOMCAN, June 9, 2022, [O-SOMCAN-1])*

"The HCD methodology revision based on SB828 (Wiener) is seriously flawed, which has been confirmed by State Auditor. The link is below.

<https://url.avanan.click/v2/> <https://www.auditor.ca.gov/reports/> .YXAzOnNm
ZHQyOmE6bzo1MTdkMjU5NmYwOGFkY2E4NmI2N2FiOWExNzkzOWQ2ZDo
2OjY1YTE6MTQ3Mml1Y2FhNjM2MmUyZWwNTY3OWRhYTMxODg5Mzli
ZDJkMDc1ZDMxZGM0NDc2NmUwM2IzNjBmMDM0MGZlZDp0OkY2021-125/index.html

- Besides criticism from the State Auditor, the HCD methodology has been criticized by elected officials and community advocates for failing to be revised to reflect a post pandemic shift. The audit has also been criticized for focusing on smaller COGs rather than the larger ones e.g. ABAG, SCAG and SANDAG.
- The HCD RHNA allocation to ABAG is seriously flawed as it's based on HCD's flawed methodology.
- ABAG did not appeal its RHNA allocation to HCD.
- The ABAG methodology used to distribute its HCD RHNA numbers across the region is seriously flawed as the majority of the RHNA numbers were assigned to cities like San Francisco. Although the San Francisco Planning Director stated at a Housing Element meeting for District 2 on July 7, 2022 that the allocation was proportional to population, many nonprofits and community advocates testified during public comment at an ABAG meeting that they strongly disagreed with this assessment.
- San Francisco didn't appeal its RHNA numbers to ABAG.
- The San Francisco RHNA allocation of 10,000 units per year is twice the number of units per year (5,000) that the City has ever produced. The Planning Department has stated the increase is in part due to carryover from previous cycles. This is a misrepresentation. The increase is due to changes in RHNA methodology.
- Per SB35 (Wiener), there are now penalties, fines and by right approvals if RHNA goals aren't met.
- Even in its present form, HCD is unlikely to approve San Francisco's Housing Element as HCD has approved only a small fraction of those submitted by other municipalities in the State. HCD is viewed as being arbitrary and capricious in these rejections.
- A lawsuit may be filed against HCD for its current RHNA numbers. San Francisco has the opportunity to join this lawsuit rather than accept unreasonable RHNA numbers.

CARRYING CAPACITY

If all 330 million Americans wanted to live in San Francisco, would this be feasible? Extremely unlikely. If all 40 million Californians wanted to live in San Francisco, would this be feasible? Very unlikely.

That being said, the Planning Department has steadfastly refused to address the issue of carrying capacity.

The Planning Department has stated that their goal is to add 500,000 new residents to San Francisco.

To accomplish this goal, the Planning Department's primary focus seems to be on newcomers and those who want to live here.

The Planning Department's lowest priority seems to be on residents who have lived here decades if not generations. Many of these longtime residents are being pushed out or their needs are being marginalized.

Regarding pandemic loss in the City's population, at the District 2 Housing Element meeting on July 7, 2022, the Planning Director stated that this was cyclical and that the City's population would rebound. SPEAK is unaware of any studies that support this statement and considers this to be hypothetical.

THE ROLE OF MARKETING RESEARCH IN VALIDATING HOUSING ELEMENT STRATEGIES

As far as SPEAK is aware, there has been no marketing research on consumer preference re housing in San Francisco. There has been no research done by either public or private entities as to where residents or potential residents actually want to live or what types of housing they prefer.

Do tens of thousands of additional residents actually want to live on the Westside so that the Housing Element's growth patterns are in sync with consumer preferences?

If not, is the Housing Element's geographic distribution of new housing units focusing heavily on the Westside arbitrary and capricious?

And, is this geographic distribution of new housing units focused heavily on the Westside based primarily on the ideology of SPUR, the Bay Area Council, the Silicon Valley Leadership Group, McKinsey and global capital?

Is there a segment of the City's population who has been led to believe that by building more housing on the Westside that the cost of housing in other parts of the City where they actually do want to live will go down?"
(Eileen Boken, Sunset-Parkside Education and Action Committee, July 11, 2022, [O-SPEAK-1])

"The pandemic has caused significant demographic shifts.

These demographic shifts are in part due to the emergence of remote work as a major force.

REAGANOMICS REDUX

In his speech at the 2022 Summit of the Americas, President Biden stated unequivocally that "Trickle down economics does not work".

Below is the link to the video:

<https://news.yahoo.com/trickle-down-economics-doesnt-says-032724847.html>

Despite the fact that Reaganomics has never worked, there are legislators who advocate for "trickle down housing" claiming that building market rate housing will make other types of housing more affordable.

Much of the housing legislation being passed in Sacramento is based on "trickle down housing". Since its inception in 1969, Housing Element policy has failed. Production of affordable housing continues to decline.

The Housing Element for RHNA cycle #6 is no exception. It's based on Reaganomics.

It's SPEAK's understanding that the City's proposed Housing Element eliminates Conditional Use for demolitions as a form of Reaganomics deregulation.

The Housing Element is not holistic.

The Housing Element is a pre-pandemic document which assumes that the City will return to its pre- pandemic form.

The Housing Element and Planning Department are not focusing on the types of housing that the City actually needs.

San Francisco is a charter city not a general law city.

Re the Westside, it's a false narrative that building more housing on the Westside will reduce housing prices in other parts of the City.

Re the Westside, the Housing Element proposes to build more market rate housing on the Westside even though there is already a glut.

Re the Westside, the Housing Element proposes to use the same scorched earth approach on the Westside as urban redevelopment did decades ago.” (*Eileen Boken, Sunset-Parkside Education and Action Committee, July 11, 2022, [O-SPEAK-10]*)

“Good afternoon, Commissioners, Zach Weisenburger with the young community developers and the REP coalition. We urge the commission to meticulously assess the impacts of the policies proposed by the Planning Department. These policies encourage demolition, displacement, and private speculative development which will have detrimental impacts on our most vulnerable communities and on the environment.

The DEIR makes multiple references to Planning’s intention of having this be San Francisco’s first Housing Element that centers racial and social equity; however, the report is inadequate as it fails to study a project alternative that actually centers and prioritizes racial and social equity.

The report fails to mention that the current Housing Element resulted in a substantial overproduction of market-rate housing and a significant underproduction of affordable housing.

The report does, however, mention that market-rate housing overwhelmingly benefits high-income earners, but it fails to discuss an alternative approach that would reverse this bias of policies that favors the market.

What centering racial and social equity actually looks like is implementing policies that privileges those who have been historically disadvantaged.

This housing element must be centered around strategies that provide every advantage to those with lower-incomes and to people of color of whose needs have been ignored for too long. (*Zach Weisenburger, Young Community Developers, June 9, 2022, [O-YCD-1]*)

“Realistically, we have heard a lot of comments about not wanting to build housing, but it is well-established that not building housing and not opening up new housing is only going to benefit speculators and investors, and doesn't help people who want to live here.

We know San Francisco is a desirable city. Unless we want to move to a hukou system similar to China where you have permits to live in San Francisco, and you can't move in without a permit, we need to build housing.

We hear people talk about -- a lot of comments about luxury housing. What is luxury housing? Quite honestly it's a small apartment with nothing -- no outdoor space, and you've got a refrigerator and maybe a washer-dryer. That doesn't sound luxury me. That sounds pretty average.

The reason it's called luxury housing is because the average cost to build in San Francisco is \$700,000 plus per unit, which isn't very affordable. But that cost comes in from cost of construction when you hear people talk about developers, they are talking about union construction folks who need to make a living wage.

We are also talking about a lot of policy and requirements set up by San Francisco planning which raises costs. When it takes three to five years to get something permitted, that drives up the cost of housing.

If we really want to push for affordable housing, Planning needs to take these impacts into account as well because the more – the longer it takes, the more roadblocks we put up, we increase the cost; we don't have affordable housing, and we benefit speculators, and we benefit existing property owners. the only people who benefit are those who have been here for years.

The EIR needs to take a realistic approach to adding new housing; otherwise, we're going to lose any control we have –” (*Adam, June 9, 2022, [I-Adam-1]*)

“I am writing to express my objection to the proposed revision to the building height limitation upward to 85 feet from the existing limit of 40 feet for Jordan Park as represented by Fig. 2-7 on page 2-25 of the Draft Environmental Impact Report (“EIR”) Volume I for the San Francisco Housing Element 2022 Update” of the General Plan.

- One of the guiding principles behind the housing element is that the development of new housing should be balanced fairly given that the west side has not absorbed much of the high density new residential development in the past. Based upon Fig. 2-7, it appears that the area delineated by Clement, Euclid and Pine Streets to the north; Park Presidio to the west; Anza to the South; and Fillmore to the east (the Delineated Area”) is being targeted to assume a disproportionate percentage of the 50,000 dwelling units (“D.U.s”) that the city is seeking to add by 2050. However, while several other neighborhoods including the Sunset, Noe Valley, Pacific Heights, Presidio Heights, Sea Cliff and the Marina would see more density, they would not be subjected to similar height increases under the proposed plan. Therefore, this plan clearly fails to meet its stated objective and standards of “fairness.”
- Certain zones within the Delineated Area are targeted for even more dramatic building height limits of 200 feet (the former Lucky Penny site, for example) and Geary, as a commercial street and major east/west thoroughfare,

is targeted for increased building height limits, which is understandable. However, allowing the height limitation increases to bleed into the neighboring many residential side streets, like Jordan, Commonwealth, Palm and Parker, is not.” (*Ann Arora, July 7, 2022, [I-Arora-1]: the following commenters provided the same comment: I-Burns-1, I-Chong, RB-1, I-Eisler, J-1, I-Eisler, M-1, I-Hart-1, I-Howell-1, I-Madsen-1, I-Marks_2-1, I-Martin-1, and I-Paul, J_3-1*)

“I am writing to express my strong objection to the proposed revision to the building height limitation upward to 85 feet from the existing limit of 40 feet for Jordan Park as represented by Fig. 2-7 on page 2-25 of the Draft Environmental Impact Report (“EIR”) Volume I for the San Francisco Housing Element 2022 Update” of the General Plan.

- One of the guiding principles behind the housing element is that the development of new housing should be balanced fairly given that the west side has not absorbed much of the high density new residential development in the past. Based upon Fig. 2-7, it appears that the area delineated by Clement, Euclid and Pine Streets to the north; Park Presidio to the west; Anza to the South; and Fillmore to the east (the Delineated Area”) is being targeted to assume a disproportionate percentage of the 50,000 dwelling units (“D.U.s”) that the city is seeking to add by 2050. However, while several other neighborhoods including the Sunset, Noe Valley, Pacific Heights, Presidio Heights, Sea Cliff and the Marina would see more density, they would not be subjected to similar height increases under the proposed plan. Therefore, this plan clearly fails to meet its stated objective and standards of “fairness.”

- Certain zones within the Delineated Area are targeted for even more dramatic building height limits of 200 feet (the former Lucky Penny site, for example) and Geary, as a commercial street and major east/west throughfare, is targeted for increased building height limits, which is understandable.” (*Zachary Bratun-Glennon, July 12, 2022, [I-Bratun-Glennon-1]*)

“I do not buy the argument that increased housing stock translates into lower priced housing.

I do know that the the low density feel of the Japantown and the entire west side is its charm.

Put new housing in areas needing redevelopment and reuse, not in established residential areas. Create new neighborhoods.” (*Ed, June 10, 2022, [I-Ed-1]*)

“Like Presidio Heights, Pacific Heights, Sea Cliff, Noe Valley, and the Marina, excluded from the plan, my neighbors in Jordan Park, Laurel Heights, and Anza Vista have chosen to live in specific neighborhoods with character and charm. Each has its specific characteristics, often as old as the neighborhood itself. Homes in iconic Jordan Park, where I live, were specifically designed with free-standing homes with front and back gardens and traditionally were attractive to San Franciscans looking for peace and beauty in a low-key neighborhood. That is still true today.

The same is true for pockets of blocks throughout the Richmond.

Just like Presidio Heights, Sea Cliff, etc., these neighborhoods were not designed for the traffic and activity that greater density and structures of 85' would bring. Yes, within the Richmond there are certainly many specific areas that would allow for increasing height restrictions from the current 40'. California St. and Geary Blvd. wouldn't be impacted in the same way as Palm, Jordan, Commonwealth, and Parker. Such major arteries already have taller structures. The same could be said for streets that already are filled with predominantly several-story apartment buildings (as can be said about Pacific Heights just as well as the Richmond end of Fulton Street).

The charm of our neighborhoods is a large part of the attraction of San Francisco to newcomers. Unfortunately, transplants and visitors are no longer charmed by downtown/Union Square. Golden Gate Park will be more difficult to access. The quality of our public schools is in question. There must be a more creative way to deal with the need for housing than by destroying the one reason many families stay in the city!

Please give the concerns of current homeowners more thought before finalizing your solution to the need for more housing in the western side of the city and doing so in what many consider a poorly focused choice of neighborhoods." (*Miriam Gauss, June 19, 2022, [I-Gauss-1]*)

"In reviewing the new height levels for the neighborhood, I can not help but be bewildered at how the city could be increasing these limits in Jordan Park. Jordan Park has been clearly defined as a residential park since its establishment in 1906.

I am for more density housing in the city but not at the cost of alternating specifically designed neighborhoods.

Specifically, I am writing to express my objection to the proposed revision to the building height limitation upward to 85 feet from the existing limit of 40 feet for Jordan Park as represented by Fig. 2-7 on page 2-25 of the Draft Environmental Impact Report ("EIR") Volume I for the San Francisco Housing Element 2022 Update" of the General Plan." (*Jonathan Golden, July 12, 2022, [I-Golden,J-1]*)

"I am writing as a resident of Jordan Park to voice my support for increasing height limits as laid out in the "Draft Environmental Impact Report Volume I for the San Francisco Housing Element 2022 Update" of the General Plan. The language in my neighborhood association's email below is typical NIMBY garbage that is the reason that so little critical housing is built in our city. Language such as "Urban Fabric", "Character of our Neighborhoods", and "other alternatives and scenarios for how the planned growth and development can be more evenly and equitably distributed throughout the city" are just code for filibustering so that nothing will change and so that existing homeowners can see their home equity increase while continuing to make the city unaffordable and non-diverse for newcomers." (*Nathaniel Keller, June 16, 2022, [I-Keller-1]*)

“It has come up at our neighborhood Association that there are proposals included in this draft for an increase in height limits on residential side streets up to 85 feet. I am writing to voice my concern about the impact this would have on the neighborhoods of San Francisco, and in particular, the character of our neighborhood- Jordan Park.” *(Laura Kline, June 17, 2022, [I-Kline-1]; the following commenter provided the same comment: I-Kline_2-1)*

“I certainly do not know all the ins and outs of the rules governing development but this proposal seems so out of line with the character of our city and neighborhoods. I wanted to write and note my concern.” *(Laura Kline, June 17, 2022, [I-Kline-3]; the following commenter provided the same comment: I-Kline_2-3)*

“I am writing to express my strongest opposition to the proposed changes in height limits in the “Draft Environmental Impact Report Volume I for the San Francisco Housing Element 2022 Update” of the General Plan. Specifically, as well hidden on page 2-25 (Fig. 2-7), the proposed change in building height restriction from 40 feet to 85 feet in an area delineated by Clement, Euclid and Pine Streets to the north; Park Presidio to the west; Anza to the South; and Fillmore to the east. This area, which encompasses Jordan Park, Laurel Heights, Anza Vista, Japantown, the Inner Richmond, etc. is being targeted for a disproportional share of the D.U.’s the City is proposing to add. Under the proposed plan, the Sunset, Noe Valley, Pacific Heights, Presidio Heights, Sea Cliff, the Marina, etc. would see more density but no proposed change in height restrictions on their side streets.

Not only does the proposed plan therefore fail to meet its stated objectives but as written would permanently destroy the fabric of the West Side of San Francisco. Increasing the density is understandable, in fact there are already a number of multi- unit buildings in Jordan Park that fit within the current planning parameters.

Increasing the height restrictions directly along the main traffic corridors (e.g., Geary Street) is logical but more than doubling the height restrictions along side streets in these neighborhoods is simply poor planning.” *(David Mahoney, June 18, 2022, [I-Mahoney-1])*

“I am writing to firmly request that the Planning Commission does not proceed with this ill-advised plan as written. Side street height restrictions in these neighborhoods should be maintained at 40 feet.” *(David Mahoney, June 18, 2022, [I-Mahoney-4])*

“Regardless of where we seek to increase the housing stock in the city, no residential side streets should have height limitations as great as 85 feet. This will irreparably damage the urban fabric of our city and the character of our neighborhoods.” *(Laurie Marks, June 16, 2022, [I-Marks-4])*

“We have been residents of Laurel Heights (near the corner of Laurel and California) for 50 years. We are in strong support of the State and City’s goals to create more low-and middle income housing.

In reviewing the Housing Element update, we generally support the placement of this new housing in all well-resourced neighborhoods, including our own. The update also mentions a preference for “small and midsize multi- family buildings.” However, in the map on page 185 of the Draft EIR, there appears to be the possibility of 240-300 foot high buildings in the vicinity of Geary and Presidio and the Muni barn. This height limit would be a severe departure from the nearby buildings. Worse, it could be a repeat of the negative consequences of Geneva Towers in SF and other now-discredited experiments in high-rise buildings for low-income housing.

We believe it will be better, in terms of creating more diverse neighborhoods and equitably distributing the environmental impact of construction, transportation and congestion, to build LOWER density housing, in MORE of the well-resourced areas, rather than fewer super dense projects in a few neighborhoods.” *(Mary Ann Massenburg and Robert D. Purcell, July 12, 2022, [I-Massenburg-1])*

“The Element is making a major emphasis on affirmative action policies. However, California banned affirmative action in all government agencies over 20 years ago.

Is the current plan legal? It does not sound like it, and the city may be vulnerable to all kinds of challenges. I urge the Planning Commission to follow all existing laws and regulations.” *(Mary Mogannam, July 11, 2022, [I-Mogannam-1])*

“My name is Glynis Nakahara. I'm a community organizer in Japantown.

First, I went to thank the Planning Department for their long effort on this opus and for regularly engaging Japantown in good faith. We really appreciate it.

I'm concerned that the draft EIR exists for the developer and [indiscernible] impacts Japantown which is a city cultural district and without [indiscernible], especially given the measures to facilitate, [indiscernible] vigorous vetting [indiscernible] I worry about the sustainability for our community. I support the need of every neighborhood to share in the need to address housing. However, the EIR includes proposals that seem to overburden Japantown. [indiscernible]

figure 2.7 shows almost 5 times the height limit from the current 60 feet [indiscernible] 85 [indiscernible][indiscernible] which will exert significant [indiscernible] housing element in January.

[indiscernible] [indiscernible] it proposes to [indiscernible] and I am wondering how this will align with [indiscernible].

[indiscernible] legislation and policies, [indiscernible] tangible after the evisceration after World War II.

And I'm wondering how this priority will align with the aforementioned [indiscernible].” *(Glynis Nakahara, June 9, 2022, [I-Nakahara-1])*

“I am concerned that the Draft EIR (DEIR) exerts extreme development pressure and impacts on Japantown. Japantown is a City Cultural District and one of only three remaining in the United States and without care and rigorous vetting and collaboration with the community – especially with proposed measures to facilitate entitlements and permitting – I worry about the sustainability of our community. I support the need of every neighborhood to share the responsibility to address the housing crises, however, the DEIR includes proposals that seem to overburden Japantown.

I would like to note the following in particular

- Figure 2-7 Shows an increase by almost 5 times in height limits from the current 50 feet to 240 feet (on page 185) and exceeds the 85’ height limits proposed in the Housing Element report in January 2022. It also doubles the height limit north of the Japan Center to 85’.
- It proposes a 108% increase in Japantown’s housing supply compared to current numbers and designate Japantown as a Housing Sustainability District
- These proposals will exert significant impacts to Japantown and yet there are no analyses related to these impacts as part of the EIR.” *(Glynis Nakahara, June 9, 2022, [I-Nakahara_2-1])*

“- At the same time, the Housing Element includes policies that seek to redress harm to the Japanese community caused by past discriminatory government actions, including Urban Renewal, which reduced Japantown from 40 blocks to its 6 blocks today and displaced hundreds of Japanese American businesses and families. How will this priority align with the aforementioned proposals?

If the Housing Element provides a path for subsequent legislation and policy that leads to massive development in Japantown without measures in place to protect vulnerable cultural assets – both tangible and intangible – and a commitment to early collaboration and vetting with the community on such developments, I see the end of Japantown. After the evisceration of WWII and Redevelopment, I doubt our community can endure another well-intentioned, government sanctioned solution.” *(Glynis Nakahara, June 9, 2022, [I-Nakahara_2-2])*

“My family and I are long time residents of Jordan Park, where we are raising our family. I am writing to express my strong objection to the proposed revision to the building height limitation upward to 85 feet from the existing limit of 40 feet for Jordan Park as represented by Fig. 2-7 on page 2-25 of the Draft Environmental Impact Report (“EIR”) Volume I for the San Francisco Housing Element 2022 Update” of the General Plan.

While I completely understand the importance of densifying the city in order to provide much needed affordable and market rate housing, it seems that can be done along certain corridors — like California and Geary — vs destroying the character and fabric of the neighborhoods that make San Francisco so special.

It is hard to understand why the proposed plan so disproportionately impacts our neighborhood where we are not only absorbing a larger percentage of the dwelling unit goal (for such a small neighborhood), but are also being subject to height increases (40 feet to 85 feet) that other neighborhoods such as the Sunset, Noe Valley, Pacific Heights, Presidio Heights, Sea Cliff and the Marina are not being subject to. The current, plan, is simply failing to meet its own stated objective of fairness. Further, the city has always gone out of its way to ensure that the character of neighborhoods are maintained (by enacting extremely strict zoning rules regarding home renovations, etc) - so how can we understand the doubling of height in a neighborhood where not a single building is over 3 or 4 stories against a long tradition of maintaining the character of the architecture? Not only is this not fair, it will destroy our neighborhood - and unless you plan to destroy all the neighborhoods in San Francisco, then again, the proposed plan is not even close to "fair."

Again, there are corridors that lend themselves to densification - and, in particular, the zones that are targeted for even higher building heights along Geary make sense.

However, allowing this height limitation increase to extend into the neighboring residential side streets like Jordan, Commonwealth, Palm and Parker, is incomprehensible." (*Shannon and Shawn O'Neill, July 10, 2022, [I-O'Neill-1]; the following commenter provided the same comment: I-Pressman-1*)

"I know the urgency to build more housing in our city, and fully support the effort in principle. I think fourplexes on any neighborhood street and sixplexes on corner lots is mostly fine. But when it comes to major changes in height limits on neighborhood streets, it is an absolute no from me. San Francisco is unique in the character of its neighborhoods, and this is what makes it so special. We've considered moving to Marin, but have concluded it has been ruined by developers who did not adhere to any form of architectural integrity.

I live in Jordan Park and chose this neighborhood because of its distinctive feel. We are seven houses in from Geary, and look out on apartment buildings in our backyard. When I see new housing going up on Geary and California, I generally applaud it. I'm not sure about your proposal to raise the building height limit to 85', but Geary and California are transit corridor streets. They can handle this type of development in areas where there is not a concentration of homes. Neighborhood streets such as Jordan and Commonwealth absolutely cannot handle the mass—it would destroy our neighborhood, and I protest loudly to any proposal to increase the building height limits." (*Julie Paul, July 5, 2022, [I-Paul,J_2-1]; the following commenter provided the same comment: I-Paul,M_1*)

"I know our city desperately needs to build more housing, but am concerned about the specific impact on my neighborhood. It would make sense to me that buildings on Geary and California could be 85' (currently the height limit is 45'), but not on the sides streets of Jordan Park." (*Julie Paul, June 21, 2022, [I-Paul,J-1]*)

“I am a resident in Jordan Park. I recently learned of the proposed change in height restrictions for Jordan Park. I am extremely concerned about the consequences of this change in height limitation from 40 feet to 85 feet.”
(Kristin Resnansky, June 20, 2022, [I-Resnansky-1])

“We all support the need for additional housing in our great city but that has to be balanced with the character of our neighborhoods. I think such a dramatic change in height limitations on side streets would irreparably damage the fabric of the neighborhood.” *(Kristin Resnansky, June 20, 2022, [I-Resnansky-3])*

“Please note my vigorous opposition to the proposal to alter the current building height restriction from 40 feet to 85 feet for Jordan Park, my neighborhood for 20+ years.” *(Christopher Schember, June 22, 2022, [I-Schember-1])*

“I am writing to express my objection to the proposed revision to the building height limitation upward to 85 feet from the existing limit of 40 feet for Jordan Park as represented by Fig. 2-7 on page 2-25 of the Draft Environmental Impact Report (“EIR”) Volume I for the San Francisco Housing Element 2022 Update” of the General Plan.

- One of the guiding principles behind the housing element is that the development of new housing should be balanced fairly given that the west side has not absorbed much of the high density new residential development in the past. Based upon Fig. 2-7, it appears that the area delineated by Clement, Euclid and Pine Streets to the north; Park Presidio to the west; Anza to the South; and Fillmore to the east (the Delineated Area”) is being targeted to assume a disproportionate percentage of the 50,000 dwelling units (“D.U.s”) that the city is seeking to add by 2050.

However, while several other neighborhoods including the Sunset, Noe Valley, Pacific Heights, Presidio Heights, Sea Cliff and the Marina would see more density, they would not be subjected to similar height increases under the proposed plan. Therefore, this plan clearly fails to meet its stated objective and standards of “fairness.”

- Certain zones within the Delineated Area are targeted for even more dramatic building height limits of 200 feet (the former Lucky Penny site, for example) and Geary, as a commercial street and major east/west thoroughfare, is targeted for increased building height limits, which is understandable.” *(Alan Titus, July 11, 2022, [I-Titus-1])*

“SF Planning has set goals for the draft housing element which reflect San Francisco’s values of diversity and equity. By building more housing in high opportunity neighborhoods on the west side, we can give kids from working class families a leg up on life. As research from Professor Chetty’s team at Harvard has shown, kids from working class families enjoy higher upward economic mobility when they grow up in high opportunity areas.

However, SF has a long way to go on this front. According to the city's site inventory report, "since 2005 only 10% of all housing produced in San Francisco, including affordable housing, has been in [well-resourced] areas" (p. 18). To correct this historic injustice, we need to do far more.

This point cannot be overstated: the city's plan is to permit new housing on the west side that the city's own constraints analysis claims is not feasible to build. And the city only commits to making apartment buildings feasible to build by 2038. This is a plan to maintain the status quo.

To actually build more housing across the income spectrum on the west side, we need to lift the ban on high rises on the west side since, according to the city's own analysis, only high rises pencil out." (*Justin Truong, June 28, 2022, [I-Truong-1]*)

"Seeing the map of our area as a targeted location for implementation of the future growth is what got everyone's attention and dander up only to hear, "Oh, it's just an example". Clearly, the Geary resident expressed her concerns for the future which we all share. Hopefully, the city won't do to Geary what it did to Van Ness and decimate the businesses and make this major thoroughfare an absolute nightmare for 10 years.

I started thinking about the buildings on Geary that would be prime for redevelopment projects to meet your housing requirements and alleviate the concern of residents like the woman who expressed hers.

Again, by way of example, the buildings between the new condo building on the corner of Stanyan and Geary to the east and the Aging Center and the Chevron Station to the west on the southeast side of the Arguello and Geary intersection would be ripe for the city to target that location for a substantial affordable housing redevelopment project. The old Pier One building has been boarded up along with others. An AT&T store suddenly appeared where a pizza parlor was.

The same for the building at the opposite corner at the NW corner of the Arguello intersection of Geary is the Office Depot building that has partially been vacant forever. Businesses can be incentivized to relocated. That is a huge lot and connects the Geary buses, the Parnassus bus and the #1 California. These could be vital blocks but currently dead zones that are exactly as you described the city wanting. No residents to lose their homes and these old concrete buildings will be replaced.

Another is the building occupied by Ross and Walgreens at 17th and Geary. Another huge lot. I would think the city with a developer, could secure these sites for affordable housing. I can't imagine it would take many to put a huge dent in the need for working and affordable housing. There are banks in the area, restaurants, coffee houses and sandwich shops, and any number of services. A block away is the approved former Alexandria Theater Building that has been shamefully vacant since "2004" will become an affordable housing and special use building.

I've suggested some parcels that are seemingly ripe for redevelopment with low community impact on the Geary Corridor because that was the example you used today and I'm familiar with the area from riding the 38 Muni Line. The reality is some areas are more easily conducive to more housing where the topography and the difficulty of creating transit hubs in the northside of the city is not realistic.

Neighbors asked yesterday where approved buildings and projects not yet built fit into the equation. The answer was that they do but currently they are not being built because people have moved out of the state (so how does one justify building more housing) construction costs go up. Additionally, it sounds like the city may be able to accomplish getting 5,000 residential units built per year up to 10,000 so you will never meet the prescribed 50,000.” (*Victoria Underwood, July 8, 2022, [I-Underwood_2-4]*)

“I am writing to express my objection to the proposed revision to the building height limitation from the existing 40 feet to 85 feet for Jordan Park.” (*Barbara Weinberg, July 10, 2022, [I-Weinberg-1]*)

RESPONSE GC (NON-CEQA)-2

Overall, these comments relate to general opinions for particular aspects of the housing element update, based on its merits. Pursuant to CEQA Guidelines section 15088(c), general comments that do not contain or specifically reference readily available information may receive a general response. These comments, in and of themselves, do not raise specific environmental issues about the adequacy or accuracy of the draft EIR’s coverage of physical environmental impacts. Thus, these comments do not require a response in this RTC document under CEQA Guidelines section 15088(c).

For informational purposes, specific comments related to the adequacy of the information and analysis in the EIR are addressed in the responses under each topical subsection. The following list identifies responses where more information is provided in this RTC document:

- Response PD-1 for a discussion of the assumptions used to inform this program EIR and additional examples of possible distribution patterns of future development growth
- Response ENS-3 for a discussion of the less-than-significant impacts related to displacement under the proposed action
- Response CR-1 for a discussion of the significant and unavoidable impacts to built-environment historic resources
- Response ALT-1 for a discussion of the range of alternatives analyzed in the draft EIR
- Response ALT-5 for a discussion of the No Project Alternative, including affordable housing production under the existing 2014 housing element
- Response GC (CEQA)-1 for a summary of the potential environmental impacts of future development consistent with the housing element update

Comment GC (NON-CEQA)-3: Community Outreach Process for the Housing Element 2022 Update

This response addresses the comments from the commenters listed below; each comment on this topic is quoted in full below this list.

- | | | |
|---------------|-----------------|------------------|
| • O-LHIA-3 | • I-Paul,J-2 | • I-Roberson-1 |
| • I-Mahoney-2 | • I-Resnansky-2 | • I-Roberson_2-1 |
| • I-Marks-2 | • I-Robbins-2 | • I-Underwood-1 |

“The City has failed to conduct a comprehensive planning process as to the areas to which growth would foreseeably be directed under the proposed project. Section 4.105 of the San Francisco Charter provides that in developing their recommendations as to goals, policies and programs for the future physical development of the City and County that take into consideration social, economic and environmental factors, the Planning Commission “shall consult with commissions and elected officials, and shall hold public hearings as part of a comprehensive planning process.”

The DEIR states that the housing element update would shift an increased share of San Francisco's projected future housing growth to transit corridors and low density districts within well-resourced areas, citing Figure 2-1. (DEIR 2-1) The DEIR explains that adoption of the housing element would lead to future actions, such as planning code amendments to increase height limits along transit corridors and to modify density controls in low-density areas that are primarily located on the west and north sides of the city. (DEIR 2-1)

In a recent meeting conducted after the DEIR and Figure 2-1 were prepared, the Planning Department staff admitted that the only outreach that the Department conducted in District 2 was to the Cow Hollow and Golden Gate Valley neighborhood associations. The Planning Department failed to conduct the required outreach to the Jordan Park and Laurel Heights neighborhoods that Figure 2-7 shows are projected to have height limits increased to 55 feet in the residential areas, 85 feet in adjacent retail shopping areas and 85 feet in the 3333 California Street property.” (*Kathy Devincenzi, Laurel Heights Improvement Association, July 12, 2022, [O-LHIA-3]*)

“To propose this in such an invisible way with no public hearing is deceptive, to avoid using harsher language.” (*David Mahoney, June 18, 2022, [I-Mahoney-2]*)

“My concern is that this proposal will receive little scrutiny, as it appears that few are aware of this plan (I certainly wasn't).” (*Laurie Marks, June 16, 2022, [I-Marks-2]*)

"I am also concerned that there has been a lack of communication about the impact of this proposed housing plan with neighborhood associations and residents. Can you please let me know what you recommend residents do at this point if we are not in favor of all aspects of the proposal?" (*Julie Paul, June 21, 2022, [I-Paul, J-2]*)

"This change hasn't been well communicated or vetted. As a resident, I want to make sure my voice and my neighbors' voices are heard." (*Kristin Resnansky, June 20, 2022, [I-Resnansky-2]*)

"In addition to my GRAVE personal threats, I quote a diligent local resident who has informed the neighborhood of the absence of public notice:

" There has been no open and transparent process and no public hearings whatsoever. No notifications have ever been issued on this subject to the public at large.

3. Burying such a critical issue within the Planning Department's website is not an open and transparent method of notifying the public, it's quite the opposite-it's opaque and secretive. As the Washington Post states "Democracy Dies in Darkness."

4. No public hearings on what is clearly a once-in-a-generation change to the heights, size, bulk, density as well as the character of neighborhoods have taken place. This needs to be rectified." (*Sallie Robbins, July 2, 2022 [I-Robbins-2]*)

"I hope that you are well. After reading about the July 12 hearing, I started to feel rather unwell due to the subversion of the public comment process for the SF Housing Element.

The Housing Element 2022 Draft EIR July 12 hearing must be postponed. The July 12th Hearing comes on the heels of a failed process by the Planning Department.

The proposed Housing Element's EIR process has not been an open or transparent and WITHOUT public hearings whatsoever. The public has received no notifications on this subject.

Planning Department's website buried this critical issue preventing an openness and transparency. In fact, it's quite the opposite-it's opaque and secretive. As the Washington Post states, "Democracy Dies in Darkness."

Clearly a once-in-a-generation change to the heights, size, bulk, density as well as the character of neighborhoods cannot take place without significant neighborhood group input and public involvement – because these areas and families will be the most greatly impacted.

The July 12th Hearing is based on a process that is flawed, opaque, secretive and absent any public outreach program whatsoever. This is unacceptable. The hearing needs to be postponed, and the process corrected." (*Kelly Roberson, May 7, 2022 [I-Roberson-1]*)

"After reading about the proposed Housing Element's proposed changes, I started to feel rather unwell due to the subversion of the public comment process for the SF Housing Element.

The proposed Housing Element's EIR process has not been an open or transparent and without public hearings whatsoever. The public has received no notifications on this subject. Ok, maybe the Planning Department, or its subcontractors, has met with a handful of selected focus groups, but has the department meet with the large residential neighborhood groups whose members are potentially hugely impacted by any changes to the zoning regulations?

Planning Department's website buried this critical issue preventing an openness and transparency. In fact, it's quite the opposite-it's opaque and secretive, or worse selective. As the Washington Post states, "Democracy Dies in Darkness."

Clearly a once-in-a-generation change to the heights, size, bulk, density as well as the character of neighborhoods cannot take place without significant neighborhood group input and public involvement – because these areas and families will be the most greatly impacted." (*Kelly Roberson, July 8, 2022, [I-Roberson_2-1]*)

"I am preparing a fairly lengthy description of the document but in the short term, early next week, we need to communicate with our Supervisor and the Planning Commission our strong opposition to the proposed Draft EIR but more importantly to the process employed by the Planning Department to slip what is truly a once-in-a-generation change past the public with the absolute minimum of public awareness, knowledge and as little input as possible from the public.

No one was notified of this document, its presence buried within the planning department's website-innocuous and unseen. A simple property re-development in San Francisco requires more public neighborhood notification than the planning department has provided for this massive proposed change.

For a major housing development the planning department is required to hold multiple public hearings prior to the issuance of a Draft EIR but apparently a total remake of swaths of the city and destruction of neighborhoods, including historic ones, can be carried out without ever seeing the light of day.

The planning department public process has been minimal, the notification of neighborhoods impacted, residents impacted, etc. has been equally nonexistent.

Even though I took exception to some of the decisions of the prior management of the planning department I give it full credit for its scrupulous commitment to carrying out public outreach programs and notifications but the current management appears to feel no such commitment to a fair, open, transparent process. This is very unfortunate.

There is a planning commission hearing on July 12th which needs to be postponed until such time as the planning department has carried out a comprehensive public outreach program, in person and/or Zoom-TBD,

that includes meetings in each of the major neighborhoods impacted. I don't think this is an unreasonable request for such a critical and impactful matter.

It's worth noting that our Redistricting process included over 30 public hearings and published all of the comments. Now I would agree that Redistricting is a critical issue impacting political representation, but at least we get to weigh in on it every 10 years.

The changes being proposed by the planning department are permanent and irreversible changes to the face and character of swaths of the city and are being carried out in a very opaque and controlled process out of sight of the public. This is not acceptable.

Please send an email to the Supervisor, the Planning Commission and the Planning Department (contact info attached). Some items to be considered, or choose your own.

1. The July 12 hearing of the Housing Element 2022 Draft EIR needs to be postponed. The July 12th Hearing comes on the heels of a failed process by the Planning Department.
2. There has been no open and transparent process and no public hearings whatsoever. No notifications have ever been issued on this subject to the public at large.
3. Burying such a critical issue within the Planning Department's website is not an open and transparent method of notifying the public, it's quite the opposite-it's opaque and secretive. As the Washington Post states "Democracy Dies in Darkness."
4. No public hearings on what is clearly a once-in-a-generation change to the heights, size, bulk, density as well as the character of neighborhoods have taken place. This needs to be rectified.
5. Historical significance neighborhoods are being demolished under this plan. This needs to be analyzed in great detail.

If you have a single point make it "the July 12th Hearing is based on a Process that is flawed, opaque, secretive and absent any public outreach program whatsoever. This is unacceptable and requires the hearing to be postponed and the process corrected."

I'll try and get out a more complete explanation this weekend, no promises but please take a moment and send an email. We have to slow down this run amok process that has excluded us up to now." (*Victoria Underwood, July 8, 2022 [I-Underwood-1]*)

RESPONSE GC (NON-CEQA)-3

The comments state that the department's community outreach process for the housing element update was inadequate and that the public was not adequately informed.

Please refer to Response GC (CEQA)-2 for a discussion of how the department complied with CEQA requirements for outreach related to the housing element update environmental review. In addition, refer to Response GC

(NON-CEQA)-4 for further information about the implementation process for the housing element update. The description of the housing element update community outreach and engagement process presented below is provided for informational purposes.

As described on draft EIR pp. 2-8 and 2-9, the department launched the public process for updating the housing element in June 2020; the first phase of outreach was completed in December 2020. This outreach included 1,631 survey respondents, 118 online platform participants, and approximately 30 community engagement events (listening sessions, presentations, and expert consultations). Based on this community outreach and engagement, the department published a first draft of goals, policies, and actions in April 2021. During the second phase of outreach (April–September 2021), the department collaborated with 21 community organizations to lead more than 22 focus groups, participated in 25 community conversations hosted by various community or neighborhood organizations, and hosted six conversations with housing experts. The findings of this outreach process were presented at the October 14, 2021, planning commission hearing. The second draft was released on January 14, 2022. A third draft of the goals, policies, and actions was released on March 30, 2022; presented to the planning commission on April 7, 2022; and submitted to the HCD for its review and feedback. The April 7, 2022, memo to the planning commission details the public outreach process on pp. 4 to 6.³⁶ The fourth draft of the goals, policies, and actions was released on October 6, 2022. Targeted public engagement has continued throughout these last two phases of the housing element update process and will continue through 2022, consisting primarily of presentations and discussion forums requested by members of the public and other city agencies.

The housing element update does not include any specific planning code amendments, zoning changes, development projects, or other implementing measures, and no such actions are proposed at this time. Although the housing element update itself would not include any changes to height limits or other development controls related to urban design or building form, the department assumes that planning code amendments enacted in the future to implement the housing element update would include height and bulk increases and changes to density controls. Please refer to Response GC (NON-CEQA)-2 for a discussion of the merits of the proposed action.

Comment GC (NON-CEQA)-4: Implementation Process

This response addresses the comments from the commenters listed below; each comment on this topic is quoted in full below this list.

- O-SPEAK-2
- I-Elmendorf-4

“THE ROLE OF FINANCIAL FEASIBILITY IN VALIDATING HOUSING ELEMENT STRATEGIES

³⁶ San Francisco Planning Department, Memo to the Planning Commission, April 7, 2022, <https://www.sfhousingelement.org/april-7th-planning-commission-memo>.

At a Housing Element presentation for District 2 on July 7, 2022, staff stated that to produce the affordable housing component of the Housing Element would cost \$1billion per year over the 8 year cycle.

However, a local media outlet has reported that to implement the affordable component of the Housing Element would cost \$19 billion, which appears to include workforce housing.

A Bay Area economist states it would be either \$15,438,000,000 or \$18,151,000,000 based on a unit cost of \$750,000 and an inclusionary percentage of 20% or 15% which does not include workforce housing.

Staff also stated that the \$1 billion per year over 8 years could come from the State. SPEAK believes that this lacks credibility as the bulk of State funds would go to Southern California as that is where the bulk of the population is.

Do these numbers make the Housing Element's affordable housing goals financially infeasible?

Added to the cost of the affordable housing is also the City's current debt portfolio. Per Fitch Ratings, the City has \$2.5 billion in outstanding General Obligation Bond debt and \$1.3 billion in outstanding Certificates of Participation debt.

In the nine years between 2012 – 2020, the City placed nine General Obligation Bonds on the ballot which were approved. This was a very aggressive timeline.

During the Housing Element presentation for District 2 on July 7, 2022, the Planning Director stated that the economics have to work for individual projects to be built.

As the US is a market driven economy, the same is true for strategies proposed in the Housing Element. The financing must be in place, construction materials and labor must be available plus interest rates and inflation must be within a certain range.

Otherwise, no matter what the Housing Element plans for won't be built.

The Housing Element seems to be premised on the ideology that upzoning is a primary tool to add affordability. However, upzoning increases land value due to value recapture and high rise construction is more expensive than low rise construction.

During public comment at the Planning Commission, the massive upzoning of the Westside was described as another form of urban redevelopment.

The Housing Element ignores the fact that there are an estimated 48,000 vacant housing units in San Francisco alone and an estimated 1.2 million vacant housing units statewide." (*Eileen Boken, Sunset-Parkside Education and Action Committee, July 11, 2022, [O-SPEAK-2]*)

"Train Wreck #1. In this scenario, HCD would reject the pipeline/status-quo capacity analysis of the current housing element draft. HCD requires the city to commit to a much more ambitious rezoning plan. The city finds itself unable to complete the requisite environmental review for a compliant plan prior to the deadline for

housing element adoption. The city thus falls out of compliance, resulting in loss of affordable housing funds and exposure to the builder's remedy.

Train Wreck #2. In this scenario, HCD would provisionally accept the city's pipeline/status-quo capacity analysis, but the department requires the housing element to include a program for mid-cycle rezoning in case the pipeline's yield falls short of projections. (HCD has imposed similar requirements on other cities that made sunny forecasts of ADU production.) The pipeline yield then does fall short, but the city is unable to pull off a timely mid-cycle rezoning because the housing element EIR didn't lay the groundwork for it. HCD responds by decertifying the housing element, cutting off affordable housing funds and exposing the city to the builder's remedy." (*Christopher S. Elmendorf, May 10, 2022, [I-Elmendorf-4]*)

RESPONSE GC (NON-CEQA)-4

Overall, the comments seek clarification about implementation of future actions consistent with the housing element update's goals, policies, and actions.

As stated on draft EIR p. S-2, the housing element update would modify the policies of the general plan's housing element. It would not implement specific changes to existing land use controls (e.g., zoning) or approve any physical development (e.g., construction of housing or infrastructure). As such, the proposed action would not result in any direct physical changes to the environment but would result in reasonably foreseeable indirect changes. The department identifies reasonably foreseeable examples that could occur with implementation of the housing element update.

Implementation Process for the Proposed Rezoning Program

As discussed under "Site Inventory" on draft EIR pp. 2-26 to 2-27, in accordance with housing element update Policy 20c (fourth draft of housing element update, October 2022) and California Government Code sections 65583(c)(1)(A) and 65583.2(h), the housing element update would include a rezoning program to demonstrate how the city would accommodate its RHNA and affirmatively further fair housing laws. The proposed zoning program would identify specific changes to height, density, and development controls consistent with the housing element update. Subsequent to publication and circulation of the draft EIR, those refinements included downward adjustments of both the estimated units expected in some pipeline projects (development agreements and large projects) and underutilized and vacant sites, among others. These downward adjustments increased the proposed rezoning program to approximately 34,000 units from 20,000 units. Accordingly, on draft EIR pp. 2-26 to 2-27, the text under "Site Inventory" has been revised as follows:

In accordance with housing element update Policy 20c~~d~~ and in accordance with the sites inventory requirements under California Government Code sections 65583(c)(1)(A) and 65583.2(h), the housing element update will include a proposed rezoning program demonstrating how the city would meet its RHNA and affirmatively furthering fair housing laws. The proposed zoning program will identify specific changes to height, density, review processes, and development controls consistent with the housing element update that would accommodate approximately ~~20,000~~ 34,000 new housing units. This EIR may be used to streamline the environmental review for the adoption of the proposed rezoning program. The

approximately ~~20,000~~ 34,000 new housing units to be accommodated in the proposed zoning program are a portion of the approximately 50,000 additional housing units projected by 2050 under the proposed action and evaluated in this EIR. In addition, the department anticipates that this EIR will be used to streamline the environmental review for future zoning and other land use control changes that would implement the objective of the housing element update to further support the production of an average of 5,000 housing units per year through 2050.

Regarding the comments about the potential physical environmental impacts of the proposed rezoning program, this EIR may be used to streamline the environmental review associated with adoption of the proposed rezoning program. Pursuant to CEQA Guidelines section 15168, this program EIR will facilitate streamlined CEQA review for future actions that implement the housing element update, such as planning code amendments to increase height limits along transit corridors or modify density controls in low-density areas, which are primarily on the west and north sides of the city.

Regarding the comment concerning the premise of the draft EIR with respect to upzoning and existing vacancy rates, please refer to Response PD-1 for a discussion of the assumptions used to inform this program EIR.

The comments regarding the character of specific neighborhoods is an issue outside the scope of CEQA.

Financing

The comments regarding financing for new housing construction are not comments on the adequacy or accuracy of the EIR. Please refer to Response ALT-5 for more information about the No Project Alternative, and the consequences of a non-compliant housing element.

Conclusion

No additional analysis or change to the EIR conclusions regarding this topic is required. These comments will be transmitted to city decision makers for their consideration during the proposed action's approval process.

M. Comments Received after Close of Comment Period

The department received three emails after July 12, 2022, the closing date for the public comment period. Late comments are not required to be included in the RTC document, but the department has chosen to include them and respond, as appropriate. The following list identifies the late commenters and the department's responses:

- I-Wuerfel comments are addressed in Response UT-3
- I-Schuttish_3 comments are addressed in Response ENS-2
- I-Thalheimer comments are addressed in Responses PD-1, ALT-1, GC (CEQA)-1, and GC (NON-CEQA)-2

No additional analysis or change to the EIR conclusions is required.

5. EIR REVISIONS

This chapter includes all changes to the draft EIR text and figures noted in the responses to comments or to clarify, expand, or update the information presented in the draft EIR. The revisions to the draft EIR derive from two sources: 1) comments raised in one or more of the comments received by the department during the draft EIR public review period; and 2) staff-initiated changes that correct minor inaccuracies and typographical errors or clarify or update material found in the draft EIR subsequent to its publication and circulation. Revisions associated with responses to comments are presented in Section A and staff-initiated changes are presented in Sections B through R. Where revisions to the draft EIR text and figures are called for, changes are shown as indented text, with new text underlined and deleted text shown with ~~strike through~~. Page numbers correspond to the page numbers of the draft EIR.

The revisions made to draft EIR text and figures do not provide new information that would result in any new significant impact not already identified in the draft EIR or a substantial increase in the severity of an impact identified in the draft EIR that cannot be mitigated to less than significant with implementation of mitigation measures. Thus, none of the draft EIR text or figure revisions would require recirculation pursuant to California Environmental Quality Act (CEQA) Guidelines section 15088.5. The draft EIR and RTC document constitute the final EIR for the proposed action, in fulfillment of CEQA requirements and consistent with CEQA Guidelines section 15132.

A. Revisions Associated with Responses to Comments

On draft EIR p. xxi, text has been revised to the Glossary as follows

Well-Resourced Areas: Refers to high- and highest-resource areas, which are neighborhoods identified by the State of California that provide strong economic, health, and educational outcomes for its residents. The state annually updates the high-and highest-resource areas based on updated economic, education, and health data. As a result, the well-resourced areas may slightly fluctuate year to year.

On draft EIR p. S-2, footnote 2 has been revised as follows:

² *Well-resourced areas* are high- and highest-resource areas, which are neighborhoods identified by the State of California that provide strong economic, health, and educational outcomes for its residents. The state annually updates the opportunity area maps based on updated economic, education, and health data. As a result, the opportunity area map boundaries may slightly fluctuate year to year. The high- and highest-resource area boundaries (i.e., well-resourced areas) shown in Figure 2-1 are based on state data from 2021; the same resource area boundaries are used to inform the proposed action changes shown in other figures in this EIR (e.g., Figure 2-7, p. 2-25, and Figure 2-8, p. 2-28, etc.). More information is available at: <https://www.sfhousingelement.org/well-resourced-neighborhoods>.

On draft EIR p. 1-3, footnote 3 has been revised as follows:

- ³ *Well-resourced areas* are high- and highest-resource areas, which are neighborhoods identified by the State of California that provide strong economic, health, and educational outcomes for its residents. The state annually updates the opportunity area maps based on updated economic, education, and health data. As a result, the opportunity area map boundaries may slightly fluctuate year to year. The high- and highest-resource area boundaries (i.e., well-resourced areas) shown in Figure 2-1 are based on state data from 2021; the same resource area boundaries are used to inform the proposed action changes shown in other figures in this EIR (e.g., Figure 2-7, p. 2-25, and Figure 2-8, p. 2-28, etc.). More information is available at: <https://www.sfhousingelement.org/well-resourced-neighborhoods>.

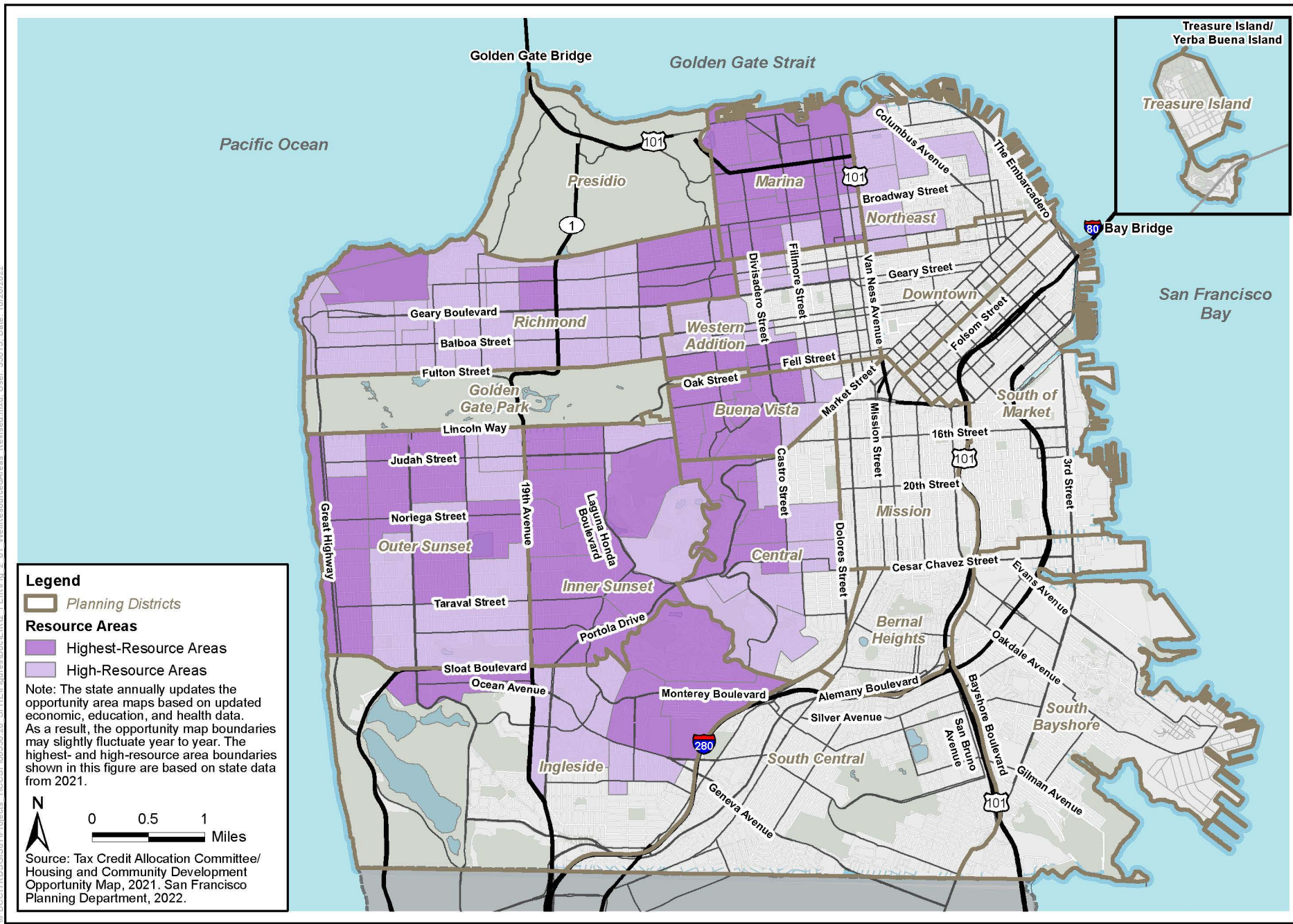
On draft EIR p. 2-1, footnote 2 has been revised as follows:

- ² *Well-resourced areas* are high- and highest-resource areas, which are neighborhoods identified by the State of California that provide strong economic, health, and educational outcomes for its residents. The state annually updates the opportunity area maps based on updated economic, education, and health data. As a result, the opportunity area map boundaries may slightly fluctuate year to year. The high- and highest-resource area boundaries (i.e., well-resourced areas) shown in Figure 2-1 are based on state data from 2021; the same resource area boundaries are used to inform the proposed action changes shown in other figures in this EIR (e.g., Figure 2-7, p. 2-25, and Figure 2-8, p. 2-28, etc.). More information is available at: <https://www.sfhousingelement.org/well-resourced-neighborhoods>.

Draft EIR Figure 2-1 on draft EIR p. 2-3 has been revised. The revised figure is provided on the following page. The only changes to the figure are the source year in the legend has been revised to 2021 and the following note has been added to the legend:

Note: The state annually updates the opportunity area maps based on updated economic, education, and health data. As a result, the opportunity map boundaries may slightly fluctuate year to year. The highest- and high-resource area boundaries shown in this figure are based on state data from 2021.

\\PDC\TRD\SIG\01\Projects_1\CCSF\00536-20_SFHEFigures\Doc\SFIR2_FIRFig_2_01_WellResourcedAreas_Revised.mxd User: 35015 Date: 10/26/2022



On draft EIR p. 4-7, the first full paragraph has been revised as follows:

~~Two new~~ Several state housing laws were signed by the governor in September 2021 and September 2022, after the department issued the notice of preparation for this EIR. ~~Those laws include~~ the California Housing Opportunity and More Efficiency (HOME) Act (amending Government Code section 66452.6 and adding sections 65852.21 and 66411.7) ~~and~~ Government Code 65913.5, and the Affordable Housing and High Road Jobs Act of 2022 (adding sections 65912.100 et seq.). These laws seek to increase the state's housing supply by enabling the development of multi-family buildings in areas zoned for single-family housing (see "Population and Housing" in Section 4.1, Effects Found Not to Be Significant, for further discussion of some of these laws) ~~and enable the development of multi-family affordable housing buildings citywide, and mixed-income buildings on commercial corridors~~. In general, the ~~California HOME Act and Government Code 65913.5~~ laws serve to increase the development potential in existing single-family neighborhoods and on commercial corridors, or citywide for 100 percent affordable housing. ~~By enabling multi family development in single family zones, t~~These laws are consistent with the proposed objectives of the housing element update to increase housing supply by allowing multi-family development in ~~single family~~ these neighborhoods and zones. Given the effective date of these laws, they were not considered in the growth projections developed for this EIR. Now considering the passage of these laws, this EIR likely represents a conservative environmental analysis because it likely overestimates the difference in growth anticipated under the 2050 environmental baseline compared to the proposed action.

On draft EIR p. 4.2-85, the second sentence of the second paragraph has been revised as follows:

For each housing project type, the table provides an example scenario, as well as the anticipated level of impact prior to mitigation for the example scenario. The housing project types in the table represent several that are anticipated to result from the proposed action, but the list is not meant to be exhaustive and does not present every future project type that could occur.

On draft EIR p. 4.2-85, the title of **draft EIR Table 4.2-7** has been revised as follows:

Table 4.2-7: Summary of Housing Project Types Anticipated for Future Development Consistent with the Housing Element Update and Anticipated Impacts prior to Application of Mitigation [Revised]

Attachment 5, Analysis of Impacts of Accelerated Construction of Regional Housing Needs Allocation, of this RTC document has been added. The purpose of this attachment is to provide informational analysis to demonstrate that the draft EIR adequately addresses the potential environmental impacts from construction of 82,070 housing units by 2031.

B. Staff-Initiated Revisions to Draft EIR Cover and Title Pages

On the cover of Volume I of the draft EIR, the date of the close of the draft EIR comment period has been revised as follows:

	Draft EIR Publication Date:	April 20, 2022
	Draft EIR Public Hearing Date:	June 9, 2022
	Draft EIR Public Comment Period:	April 20, 2022 – June 20, 2022 <u>July 12, 2022</u>

On the title page of Volume I of the draft EIR, the date of the close of the draft EIR comment period has been revised as follows:

	Draft EIR Publication Date:	April 20, 2022
	Draft EIR Public Hearing Date:	June 9, 2022
	Draft EIR Public Comment Period:	April 20, 2022 – June 20, 2022 <u>July 12, 2022</u>

On the cover of Volume II of the draft EIR, the date of the close of the draft EIR comment period has been revised as follows:

	Draft EIR Publication Date:	April 20, 2022
	Draft EIR Public Hearing Date:	June 9, 2022
	Draft EIR Public Comment Period:	April 20, 2022 – June 20, 2022 <u>July 12, 2022</u>

On the title page of Volume II of the draft EIR, the date of the close of the draft EIR comment period has been revised as follows:

	Draft EIR Publication Date:	April 20, 2022
	Draft EIR Public Hearing Date:	June 9, 2022
	Draft EIR Public Comment Period:	April 20, 2022 – June 20, 2022 <u>July 12, 2022</u>

C. Staff-Initiated Revisions to Draft EIR Table of Contents¹

On draft EIR p. iii, the titles of draft EIR Appendices B, C, F, G, and I have been revised as follows:

Appendices

Appendix A: Notice of Preparation and Comments Received

Appendix B: Revised Housing Element Update Policies and Implementing Actions (draft 4, October 2022)

Appendix C: Revised Housing Element 2022 Update Modeling and Projections

Appendix D: Aesthetics Supporting Information

Appendix E: Biological Resources Supporting Information

Appendix F: Revised Cultural Resources Supporting Information

Appendix G: Revised Transportation Supporting Information

Appendix H: Noise Supporting Information

Appendix I: Revised Air Quality Supporting Information

Appendix J: Wind Supporting Information

Appendix K: Shadow Supporting Information

On draft EIR p. iv, the titles of **draft EIR Figures 2-1, 2-8, 4.6-7, and 4.6-9** have been revised as follows:

Figure 2-1	Well-Resourced Areas <u>[Revised]</u>	2-2
Figure 2-8	Areas Under Consideration for Possible Housing Sustainability Districts <u>[Revised]</u>	2-28
Figure 4.6-7	2035 Proposed Action: Change in Traffic-Related PM _{2.5} Contributions Compared to 2035 Midpoint Conditions <u>[Revised]</u>	4.6-59
Figure 4.6-9	2050 Proposed Action: Change in Traffic-Related PM _{2.5} Contributions Compared to 2050 Environmental Baseline Conditions <u>[Revised]</u>	4.6-62

On draft EIR p. vii, the titles of **draft EIR Figures 6-3, 6-5, 6-7, and 6-9** have been revised as follows to reflect the errata dated May 19, 2022:

Figure 6-3	Projected Difference by Planning District in Housing Growth and Distribution Between 2050 Environmental Baseline and Eastside Alternative <u>[Revised]</u>	6-9
------------	--	-----

¹ The revised draft EIR appendices and draft EIR figures indicated in the revisions to the draft EIR Table of Contents are included under “Section A. Revisions Associated with Responses to Comments,” “Section E. Revisions to Project Description Chapter (Draft EIR Chapter 2),” “Section M. Revisions to Air Quality Section (Draft EIR Section 4.6),” “Section O. Revisions to Alternatives Chapter (Draft EIR Chapter 6),” and “Section R. Revisions to Draft EIR Appendices” in this chapter.

Figure 6-4	Projected Heights Under the Eastside Alternative	6-10
Figure 6-5	Projected Difference by Planning District in Housing Growth and Distribution Between 2050 Environmental Baseline and Preservation Alternative [Revised]	6-13
Figure 6-6	Projected Heights and Density Controls Under the Preservation Alternative	6-14
Figure 6-7	Projected Difference by Planning District in Housing Growth and Distribution Between 2050 Environmental Baseline and Dispersed Growth Alternative [Revised]	6-16
Figure 6-8	Projected Density Controls Under the Dispersed Growth Alternative	6-17
Figure 6-9	Projected Difference by Planning District in Housing Growth and Distribution Between 2050 Environmental Baseline and Plan Bay Area 2050 [Revised]	6-19

On draft EIR p. ix, the titles of **draft EIR Tables 4.2-1** and **4.2-7** have been revised as follows:

Table 4.2-1	Completed and Planned Historic Context Statements Informing the San Francisco Cultural Resources Survey [Revised]	4.2-42
Table 4.2-7	Summary of Housing Project Types Anticipated for Future Development Consistent with the Housing Element Update <u>and Anticipated Impacts prior to Application of Mitigation</u> [Revised].....	4.2-85

On draft EIR p. xvi, text has been added to the Glossary as follows

CEQA review of future actions: Or similar phrases in the EIR (e.g., further environmental review, independent CEQA review, etc.) means: a) the planning department will assess if the future action is a “project” as defined by CEQA Guidelines section 15378, and b) if the future action is a project, the department will determine the appropriate level of CEQA review for the future action (e.g., statutory or categorical exemption, streamlined review under CEQA guidelines sections 15183 or 15183.3, subsequent EIR under CEQA guidelines 15162, etc.) and appropriate environmental topic analysis.

On draft EIR p. xvii, text has been revised to the Glossary as follows

Government constraints: Land use controls, building codes and their enforcement, site improvements, fees and other exactions required of developers, and local processing and permit procedures that hinder the locality from meeting its share of the regional housing need. Examples of constraint removal could be the establishment of Housing Sustainability Districts or establishment of ministerial approval review process.

D. Staff-Initiated Revisions to Draft EIR Summary Chapter

On draft EIR p. S-2, the last sentence of the first partial paragraph has been revised as follows:

The underlying policies and actions would guide development patterns and the allocation of resources to San Francisco neighborhoods. In general, the housing element update would shift an increased share of the City and County of San Francisco’s (city’s) future housing growth to transit corridors and low-density

residential districts within but not limited to, well-resourced areas (see **Figure 2-1**, p. 2-2, in Chapter 2, Project Description).

On draft EIR p. S-2, the first full paragraph has been revised as follows:

Specifically, the department assumes that adoption of the housing element update would lead to future actions, such as planning code amendments to increase height limits along transit corridors and to modify density controls in low-density areas that are primarily located on the west and north sides of the city, designation of housing sustainability districts, removal of other government constraints on the maintenance, improvement, and development of housing, and approval of development projects consistent with the goals, policies, and actions of the housing element update.

On draft EIR pp. S-10 and S-11, the summary of impact statement Impact C-RE-1 has been revised as follows to be consistent with the significance determination in the analysis:

Impact C-RE-1: The proposed action, in combination with cumulative projects, would not result in a significant cumulative impact on recreation.	S <u>LTS</u>	These impacts would be generally similar to the impacts identified in this EIR that could result from the construction and operation of future development projects consistent with the housing element update, and would be subject to the same or similar regulatory requirements and mitigation measures, as applicable. Such mitigation measures could include those identified in this EIR, including: Mitigation Measure M-CR-2a: Archeological Resources Requirements for Projects Involving Soil Disturbance, Mitigation Measure M-CR-2b: Archeological Monitoring Program, Mitigation Measure M-CR-2c: Archeological Testing Program, Mitigation Measure M-CR-2d: Treatment of Submerged and Deeply Buried Resources, in Section 4.2; Cultural Resources; Mitigation Measure M-TCR-1: Tribal Notification and Consultation, in Section 4.3, Tribal Cultural Resources; Mitigation Measure M-NO-1: Construction Noise Control, Mitigation Measure M-NO-3a: Protection of Adjacent Buildings/Structures and Vibration Monitoring During Construction, and Mitigation Measure M-NO-3b: Prevent Damage to Vibration Sensitive Equipment, in Section 4.5, Noise and Vibration, as well as Mitigation Measure M-AQ-3: Construction Air Quality, in Section 4.6, Air Quality. None required.	LTS <u>NA</u>
---	-------------------------	---	--------------------------

On draft EIR p. S-19, the impact statement Impact HAZ-4 has been revised as follows to be consistent with the analysis (the significance determination is unchanged):

Impact HAZ-4: The proposed action could be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code section 65962.5 ~~and~~, but would not as a result, create a significant hazard for the public or the environment due to regulations.

On draft EIR p. S-80, the summary of impact statement Impact C-AQ-1 has been revised as follows to be consistent with the analysis (the significance determination is unchanged):

Impact C-AQ-1: The proposed action, in combination with cumulative projects, would expose sensitive receptors to substantial levels of fine particulate matter (PM _{2.5}) and toxic air contaminants under cumulative conditions.	S	<p><i>Mitigation Measure M-AQ-3: Clean Off-Road Construction Equipment; and Mitigation Measure M-AQ-5: Best Available Control Technology for Diesel Engines.</i></p> <p>(See above)</p> <p><i>Mitigation Measure M-TR-4a: Parking Maximums and Transportation Demand Management.</i></p> <p>(See Section 4.4, Transportation and Circulation, and above)</p>	SUM
---	---	--	-----

On draft EIR pp. S-88, the summary of impact statement Impact C-GE-2 has been revised as follows to be consistent with the significance determination in the analysis:

Impact C-GE-2: The proposed action, in combination with cumulative projects, would result in a significant cumulative impact related to paleontological resources.	S <u>LTS</u>	<p><i>Mitigation Measure M-GE-5: Inadvertent Discovery of Paleontological Resources during Construction.</i></p> <p>(See above)</p> <p><u>None required.</u></p>	LTS <u>NA</u>
--	--------------	---	---------------

On draft EIR p. S-107, the impact statement Impact HAZ-4 has been revised as follows to be consistent with the analysis (the significance determination is unchanged):

Impact HAZ-4: The proposed action could be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code section 65962.5 ~~and, as a result,~~ but would not create a significant hazard for the public or the environment due to regulations. (LTS)

On draft EIR p. S-119, the impact statement Impact HAZ-4 has been revised as follows to be consistent with the analysis (the significance determination is unchanged):

Impact HAZ-4: The proposed action could be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code section 65962.5 ~~and, as a result,~~ but would not create a significant hazard for the public or the environment due to regulations. (LTS)

E. Staff-Initiated Revisions to Introduction (Draft EIR Chapter 1)

On draft EIR p. 1-1, the third paragraph under “A. Proposed Action Overview” has been revised as follows:

As such, the proposed action would not result in any direct physical changes to the environment, but would result in reasonably foreseeable indirect changes. Specifically, the department assumes that adoption of the housing element update would lead to future actions, such as planning code amendments to increase height limits along transit corridors and to modify density controls in low-density areas that are primarily located on the west and north sides of the city, designation of housing sustainability districts, removal of other government constraints on the maintenance, improvement, and development of housing, and approval of development projects consistent with the goals, policies, and actions of the housing element update.

On draft EIR p. 1-3, the first sentence under “Programmatic Review of Potential Impacts” has been revised as follows:

In general, the housing element update would shift an increased share of the San Francisco’s projected future housing growth to transit corridors and low-density residential districts within but not limited to well-resourced areas (see **Figure 2-1**, p. 2-2, in Chapter 2, Project Description).³

On draft EIR p. 1-8, the date of the close of the draft EIR comment period in the second and third full paragraphs has been revised as follows:

The EIR was published on April 20, 2022. There will be a public hearing before the planning commission during the ~~approximately 60-day~~ 83-day public review and comment period for this EIR to solicit public comment on the adequacy and accuracy of information presented in the EIR. CEQA establishes a minimum draft EIR comment period of 30 days, or 45 days if the draft EIR is submitted to the State Clearinghouse for review (CEQA section 21091). The CEQA Guidelines further address the review period length, stating that the comment period should be not less than 30 days nor more than 60 days except in unusual circumstances (CEQA Guidelines section 151105(a)). Given the significance of the housing element update, the department determined that a review period of 60 days, instead of the typical 30 or 45 days, is appropriate for this EIR. On June 16, 2022, the department extended the comment period to July 12, 2022, for a total review period of 83 days.

The public comment period for the EIR is April 20 to ~~June 20, 2022~~ July 12, 2022. The public hearing on this EIR has been scheduled before the planning commission for June 9, 2022. Please check <https://sfplanning.org/hearings-cpc> the week of the hearing for the hearing agenda, location and/or public access code, or contact the assigned planner. The hearing will be streamed online at SFGovTV, <https://sfgovtv.org/planning>, or on cable channels 26 or 78, subject to SFGovTV scheduling. Further information and instructions on accessing the planning commission hearing and making a public comment are detailed on the planning department’s website, <https://sfplanning.org/hearings-cpc>.

On draft EIR p. 1-9, the date of the close of the draft EIR comment period first full paragraph has been revised as follows:

Written comments should be emailed to CPC.HousingElementUpdateEIR@sfgov.org (preferred) or sent to Elizabeth White, San Francisco Planning Department, 49 South Van Ness Avenue, Suite 1400, San Francisco, CA 94103 by 5 p.m. on ~~June 20, 2022~~ July 12, 2022. If attachments are provided as part of an e-mail comment on the EIR, please provide them in a text-searchable pdf format, if possible.

F. Staff-Initiated Revisions to Project Description Chapter (Draft EIR Chapter 2)

On draft EIR p. 2-1, the last sentence of the second full paragraph has been revised as follows:

The underlying policies and actions would guide development patterns and the allocation of resources to San Francisco neighborhoods. In general, the housing element update would shift an increased share of the San Francisco's projected future housing growth to transit corridors and low-density residential districts within, but not limited to, well-resourced areas (see Figure 2-1).²

On draft EIR p. 2-1, the fourth sentence of third paragraph has been revised as follows:

As such, the proposed action would not result in any direct physical changes to the environment, but would result in reasonably foreseeable changes. Specifically, the San Francisco Planning Department (department) assumes that adoption of the housing element update would lead to future actions, such as planning code amendments to increase height limits along transit corridors and to modify density controls in low-density areas that are primarily located on the west and north sides of the city, designation of housing sustainability districts, removal of other government constraints on the maintenance, improvement, or development of housing,^{3a} and approval of development projects consistent with the goals, policies, and actions of the housing element update.

On draft EIR p. 2-1, footnote 3a has been added as follows:

^{3a} The housing element update proposes removing governmental constraints to the maintenance, improvement, or development of housing for all income levels. As noted above, one constraint removal could be the establishment of housing sustainability districts. Others could include establishment of streamlined and/or ministerial approval review processes for certain housing applications such as those that may have increased on-site affordability or that are located in well-resourced neighborhoods outside of areas vulnerable to displacement, among other considerations. Please refer to p. 2-6 for further information about constraints to the maintenance, improvement, or development of housing for all income levels.

On draft EIR p. 2-8, the first paragraph under "Housing Element Update Process" has been revised as follows:

The department launched the public process for updating the housing element in June 2020, and a first phase of outreach was completed in December 2020. This outreach included 1,631 survey respondents, 118

online platform participants, and approximately 30 community engagement events (listening sessions, presentations, and expert consultations). Based on this community outreach and engagement, the department published a first draft of goals, policies, and actions in April 2021. During the second phase of outreach (April-September 2021), the department collaborated with 21 community organizations to lead over 22 focus groups, participated in 25 community conversations hosted by various community or neighborhood organizations, and hosted six conversations with housing experts. The findings of this outreach process were presented on October 14, 2021 at the planning commission hearing, and the second draft was released on January 14, 2022. A third draft of goals, policies, and actions was released on March 24³⁰, 2022, and presented to the planning commission ~~in early spring 2022~~ on April 7, 2022, and ~~will be~~ submitted to the HCD for its review and feedback. The department released a fourth draft of goals, policies, and actions on October 6, 2022. Any final revisions will be incorporated into a final draft for adoption, which will be presented to the planning commission at a general plan amendment initiation hearing, followed by a hearing for planning commission adoption. If recommended by the planning commission, the board of supervisors would adopt or disapprove at a public hearing. If adopted, the housing element update would be submitted to the HCD for final certification.

On draft EIR p. 2-10, footnote 13a has been added to the last sentence of the last paragraph under “Type of EIR and Future Use” has been revised as follows:

The department will therefore focus the CEQA review of future actions^{13a} consistent with the housing element update on significant adverse impacts on the physical environment, if any, that were not anticipated in the housing element update EIR.

On draft EIR p. 2-10, footnote 13a has been added as follows:

^{13a} “CEQA review of future actions” or similar phrases in the EIR (e.g., further environmental review, independent CEQA review, etc.) means: a) the department will assess if the future action is a “project” as defined by CEQA Guidelines section 15378, and b) if the future action is a project, the department will determine and conduct the appropriate level of CEQA review for the future action (e.g., statutory or categorical exemption, streamlined review under CEQA Guidelines sections 15183 or 15183.3, subsequent EIR under CEQA Guidelines 15162, etc.) and appropriate environmental topic analysis.

On draft EIR p. 2-11, the bullet under “C. Project Objectives” has been updated, consistent with the fourth draft of the San Francisco Housing Element 2022 Update (October 2022), as follows:

- Goal 2: Repair the harms of historic racial and ethnic discrimination against American Indian, Black, and other people of color

On draft EIR p. 2-11, the last paragraph under “C. Project Objectives” has been revised as follows:

The primary objective of the housing element update is to promote the development of more housing through 2050 than is anticipated under existing 2014 housing element policies, while also advancing racial and social equity. To meet the equity objectives, the proposed policies seek to change the geographic distribution of where housing growth would occur in the city. As illustrated in Figure 2-1, p. 2-2, most of the

well-resourced areas, as defined by state's 2021 opportunity area maps, are in the northern and western portions of the city. Most of the moderate and low-resource areas are in the eastern and southern portions of the city. The state annually updates the opportunity area maps based on updated economic, education, and health data. As a result, the opportunity area map boundaries may slightly fluctuate year to year. The high- and highest-resource area boundaries (i.e., well-resourced areas) shown in Figure 2-1 are based on state data from 2021; the same resource area boundaries are used to inform the proposed action changes shown in other figures in this EIR (e.g., Figure 2-7, p. 2-25, and Figure 2-8, p. 2-28, etc.). The proposed action recommends equitable distribution of growth throughout the city, which would mean increased development in the most up-to-date well-resourced areas. In well-resourced areas, the proposed action recommends promoting small and midrise multi-family development through height increases along certain transit corridors and through removing density limits or increasing allowable density limits in low-density areas.”

On draft EIR pp. 2-20 through 2-23, under “Proposed Goals, Policies, and Actions,” the text has been revised to reflect the fourth draft of the San Francisco Housing Element 2022 Update, October 2022. The policies have been refined based on community engagement and feedback from the California Department of Housing and Community Development. New policies that are relevant to the assessment of the proposed action’s physical effects on the environment, included as part of the fourth draft that were not in the third draft of housing element update policies (March 2022), are policies 26, 27, 29, 30, and 36. The text has been revised as follows:

Not all of the goals, policies, and actions included in the housing element update will lead to physical effects on the environment. Examples of housing element update policies that are relevant to the assessment of the proposed action’s physical effects on the environment include:

- Policy 2: Preserve affordability of existing subsidized housing, government-owned or cooperative owned housing, or SRO hotel rooms where the affordability requirements are at risk or soon to expire.
- Policy 3: Acquire and rehabilitate privately-owned housing as permanently affordable to better serve residents and areas vulnerable to displacement with unmet affordable housing needs.
- Policy 4: Facilitate the legalization of unauthorized dwelling units while improving their safety and habitability.
- Policy 7: Pursue permanently affordable housing investments that are specific to the geographic, cultural, and support needs of recently arrived or newly independent residents or residents from marginalized groups, including transgender and LGBTQ+ people.
- Policy 8: Expand permanently supportive housing and services for individuals and families experiencing homelessness as a primary part of a comprehensive strategy to eliminate homelessness.
- Policy 11: Establish and sustain homeownership programs and expand affordable housing access for American Indian, Black, Japanese, Filipino, and other communities to redress harm directly caused by past discriminatory government actions including redlining, urban renewal, the Indian Relocation Act, or WWII Japanese incarceration.

- Policy 12: Invest in and expand access to cultural anchors, land, and spaces that are significant to American Indian, Black, Japanese, Filipino, and other communities directly harmed by past discriminatory government actions including redlining, urban renewal, the Indian Relocation Act or WWII Japanese incarceration to redress histories of dispossession, social disruption, and physical displacement.
- Policy 15: Expand permanently affordable housing investments in Priority Equity Geographies²⁰ to better serve American Indian, Black, and other People of color within income ranges underserved, including extremely-, very low-, and moderate-income households.
- Policy 16: Improve access to well-paid jobs and business ownership for American Indian, Black and other communities of color, particularly those who live in Priority Equity Geographies, to build the wealth needed to afford and meet their housing needs.
- Policy 17: Expand investments in Priority Equity Geographies to advance equitable access to resources while ensuring community stability.
- Policy 18: Tailor zoning changes within Priority Equity Geographies and intersecting Cultural Districts to serve the specific needs of American Indian, Black, and other communities of color while implementing programs to stabilize communities and meet community needs.
- Policy 19: Enable low and moderate-income households, particularly American Indian, Black, and other people of color, to live and prosper in Well-resourced Neighborhoods by increasing the number of permanently affordable housing units in those neighborhoods.
- Policy 20: Increase mid-rise and small multi-family housing types by adopting zoning changes or density bonus programs in Well-resourced Neighborhoods and adjacent lower-density areas near transit, including along SFMTA Rapid Network and other transit.
- Policy 21: Prevent the potential displacement and adverse racial and social equity impacts of zoning changes, planning processes, or public and private investments especially for populations and areas vulnerable to displacement.
- Policy 22: Create dedicated and consistent local funding sources and advocate for regional, State, and Federal funding to support building permanently affordable housing for very low-, low-, and moderate-income households that meets the Regional Housing Needs Allocation targets.
- Policy 23: Retain and increase the number of moderate- and middle-income households by increasing their homebuying opportunities and reversing the shortage in housing that is affordable for these households.
- Policy 24: Enable mixed-income development projects to maximize the number of permanently affordable housing constructed, in balance with delivering other permanent community benefits that advance racial and social equity.
- Policy 25: Reduce governmental constraints on development in Well-resourced Neighborhoods to enable small and mid-rise multi-family buildings providing improved housing choice and affordability.

- Policy 26: Streamline and simplify permit processes to provide more equitable access to the application process, improve certainty of outcomes, and ensure meeting State- and local-required timelines, especially for 100% affordable housing and shelter projects.
- Policy 27: Improve coordination, alignment, shared mission, and functionality of post-entitlement permit processes across agencies and jurisdictions to speed housing construction starts after approvals, especially for 100% affordable housing and development agreements.
- Policy 29: Complete community-led processes in Priority Equity Geographies that provide defined community benefits or mitigations for effects of new development consistent with state and federal law in order to reduce burdens on advocates of vulnerable populations and community members and establish more predictable outcomes for housing applications.
- Policy 30: Support the reduction of non-governmental challenges that enable affordable housing and small and mid-rise multi-family buildings as a prominent housing type.
- Policy 31: Facilitate small and mid-rise multi-family buildings that private development can deliver to serve middle-income households without deed restriction, including through adding units in lower density areas or by adding Accessory Dwelling Units (ADUs).
- Policy 32: Promote and facilitate aging in place for seniors and multi-generational living that supports extended families and communal households.
- Policy 33: Prevent the outmigration of families with children and support the needs of families to grow.
- Policy 34: Encourage co-housing to support ways for households to share space, resources, and responsibilities, especially to reinforce supportive relationships within and across communities and generations.
- Policy 35: Require new commercial developments and large employers, hospitals, and educational institutions to help meet housing demand generated by anticipated job growth to maintain an appropriate jobs-housing fit, and address housing needs of students.
- Policy 36: Maximize the use of existing housing stock for residential use by discouraging vacancy, short-term use, and speculative resale.
- Policy 37: Facilitate neighborhoods where proximity to daily needs and high-quality community services and amenities promotes social connections, supports caregivers, reduces the need for private auto travel, and advances healthy activities.
- Policy 38: Ensure transportation investments create equitable access to transit and are planned in parallel with increase in housing capacity to advance well-connected neighborhoods consistent with the City's Connect SF vision, and encourage sustainable trips in new housing.
- Policy 39: Support the repair and rehabilitation of housing to ensure life safety, health, and well-being of residents, especially in Environmental Justice Communities,²⁰ and to support sustainable building practices.

- Policy 40: Enforce and improve planning processes and building regulations to ensure a healthy environment for new housing developments, especially in Environmental Justice Communities.
- Policy 41: Shape urban design policy, standards, and guidelines to enable cultural and identity expression, advance architectural creativity and durability, and foster neighborhood belonging.
- Policy 42: Support cultural uses, activities, and architecture that sustain San Francisco's diverse cultural heritage.
- ~~Policy 2. Preserve affordability of existing subsidized housing, government-owned or cooperative-owned housing, or SRO hotel rooms where the affordability requirements are at risk or soon to expire.~~
- ~~Policy 3. Reform and support the City's acquisition and rehabilitation program to better serve areas and income ranges underserved by affordable housing options and areas vulnerable to displacement.~~
- ~~Policy 4. Preserve the affordability of unauthorized dwelling units while improving their safety and habitability.~~
- ~~Policy 7. Pursue investments in permanently affordable housing that are specific to neighborhoods that serve as entry points to recently arrived residents from certain groups, such as transgender and LGBTQ+ refugees or immigrants, or specific to populations such as transitional aged youth or transgender people.~~
- ~~Policy 11. Establish and sustain homeownership housing programs designed around a reparations framework for American Indian, Black, Japanese, Filipino, and other communities directly harmed by past discriminatory government actions in the past including redlining, Redevelopment and Urban Renewal, the Indian Relocation Act, or WWII Japanese incarceration, as a means of redressing the harms and with the goal of stabilizing these communities and bringing back those who have been displaced from the city.~~
- ~~Policy 12. Invest in cultural anchors and expand access to land and spaces that hold cultural importance for American Indian, Black, Japanese, Filipino, and other communities directly harmed by discriminatory government actions in the past including redlining, Redevelopment and Urban Renewal, the Indian Relocation Act or WWII Japanese incarceration as a means of redressing histories of dispossession, social disruption, and physical displacement based on a reparations framework.~~
- ~~Policy 15. Expand permanently affordable housing investments in Priority Equity Geographies²⁹ to better serve American Indian, Black, and other People of color within income ranges underserved, including extremely , very low , and moderate income households.~~
- ~~Policy 17. Expand investments in Priority Equity Geographies to advance equitable access to resources while ensuring community stability.~~
- ~~Policy 18. Tailor zoning changes within Priority Equity Geographies and intersecting Cultural Districts to serve the specific needs of American Indian, Black, and other communities of color.~~

- Policy 19. Enable low and moderate income households, particularly American Indian, Black, and other people of color, to live and prosper in Well-resourced Neighborhoods by increasing the number of permanently affordable housing units in those neighborhoods.
- Policy 20. Increase mid-rise and small multi-family housing types in Well-resourced Neighborhoods near transit, including along SFMTA Rapid Network and other transit, and throughout lower-density areas, by adopting zoning changes or density bonus programs.
- Policy 21. Prevent the potential displacement and adverse racial and social equity impacts of zoning changes, planning processes, or public and private investments especially for populations and in areas vulnerable to displacement.
- Policy 22. Create a dedicated and consistent local funding stream and advocate for State and Federal funding to support building permanently affordable housing for very low-, low-, and moderate-income households that meets the Regional Housing Needs Allocation targets.
- Policy 23. Retain and increase the number of moderate- and middle-income households through building permanently affordable workforce housing and reversing the shortage in affordable housing built for these households.
- Policy 24. Support mixed-income development projects to maximize the number of permanently affordable housing constructed, in balance with delivering other permanent community benefits that advance racial and social equity.
- Policy 25. Reduce development constraints such as lengthy City-permitting process and high construction costs to increase housing choices and improve affordability.
- Policy 26. Facilitate small and mid-rise multi-family buildings as a prominent housing type that private development can deliver to serve middle-income households without deed restriction, including through expansion or demolition of existing lower density housing, or by adding Accessory Dwelling Units (ADUs).
- Policy 27. Promote and facilitate aging in place for seniors and multi-generational living that supports extended families and communal households.
- Policy 28. Prevent the outmigration of families with children and support the needs of families to grow.
- Policy 29. Encourage co-housing to support ways for households to share space, resources, and responsibilities, especially to reinforce supportive relationships within and across communities and generations.
- Policy 30. Require new commercial developments and large employers, hospitals, and educational institutions to help meet housing demand generated by anticipated job growth to maintain an appropriate jobs-housing fit, and address housing needs of students.
- Policy 32. Facilitate neighborhoods where proximity to daily needs and high-quality community services and amenities promotes social connections, supports caregivers, reduces the need for private auto travel, and advances healthy activities.

- Policy 33. Ensure transportation investments advance equitable access to transit and are planned in parallel with increase in housing capacity to create well-connected neighborhoods consistent with the City's Connect SF vision, and encourage sustainable trips in new housing.
- Policy 34. Support the repair and rehabilitation of housing to ensure life safety, health, and well-being of residents, especially in Environmental Justice Communities,²¹ and to support sustainable building practices.
- Policy 35. Enforce and improve planning processes and building regulations to ensure a healthy environment for new housing developments, especially in Environmental Justice Communities.
- Policy 36. Shape urban design policy, standards, and guidelines to enable cultural and identity expression, advance architectural creativity and durability, and foster neighborhood belonging.
- Policy 37. Support cultural uses, activities, and architecture that sustain San Francisco's dynamic and unique cultural heritages.

²⁰ More information about priority equity geographies is available at: <https://sfhousingelement.org/priority-equity-geographies>.

²¹ More information about environmental justice communities is available at: <https://sfplanning.org/project/environmental-justice-framework-and-general-plan-policies#ej-communities>.

²⁰ More information about priority equity geographies is available at: <https://sfhousingelement.org/priority-equity-geographies>.

²¹ More information about environmental justice communities is available at: <https://sfplanning.org/project/environmental-justice-framework-and-general-plan-policies#ej-communities>.

On draft EIR p. 2-23, the first full paragraph under the bullet list has been revised as follows:

- In addition to the goals, policies, and actions to be included as updates to the housing element itself, the housing element update would require conforming amendments to policies in other general plan elements (i.e., elements other than the housing element) including in the Land Use Index. The revisions are minor in nature and are not expected to have any environmental impacts that are separate and distinct from the impacts of the housing element update analyzed in this EIR. To the extent the conforming amendments could lead to physical effects on the environment, those effects would be similar to the effects of the housing element amendments themselves, and are analyzed in this EIR.

On draft EIR p. 2-23, the first paragraph under “Future Actions that Would Implement the Housing Element Update’s Goals, Policies, and Actions” has been revised as follows:

As previously discussed, the department assumes that adoption of the housing element update would lead to future actions, such as planning code amendments to increase height limits along transit corridors and to modify density controls in low-density areas that are primarily located on the west and north sides of the city, designation of housing sustainability districts, removal of other constraints on the maintenance, improvement, or development of housing, and approval of development projects consistent with the goals, policies, and actions of the housing element update described above.

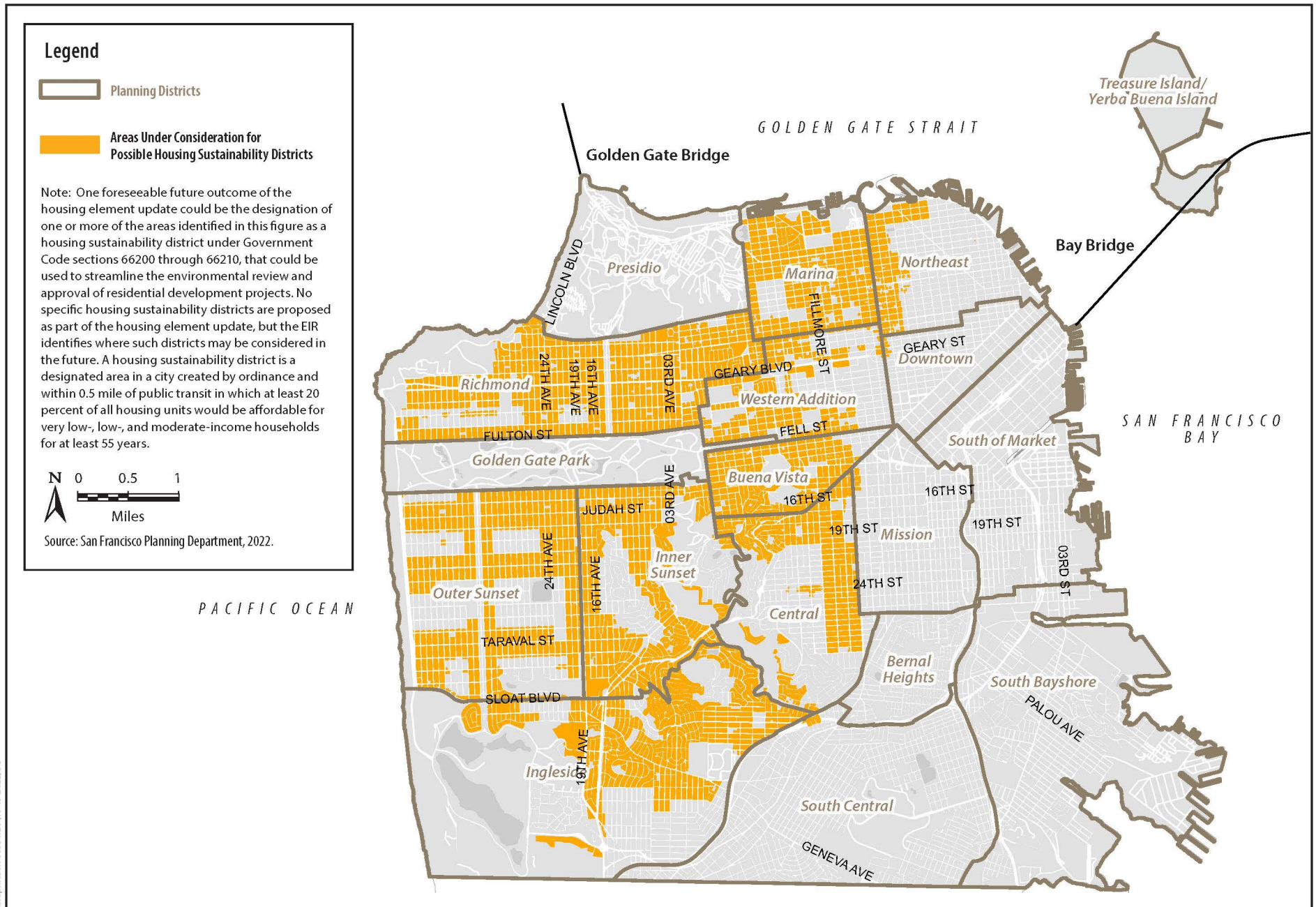
On draft EIR p. 2-24, the first sentence of the first paragraph under “Changes in Land Use Density and Distribution” has been revised as follows:

In general, although housing development would occur in all areas of the city where allowed by zoning, the housing element update would endeavor to shift an increased share of the city’s future housing growth to transit corridors and low-density residential districts within but not limited to, well-resourced areas.

On draft EIR pp. 2-26 to 2-27, the text under “Site Inventory” has been revised due to analytical refinements of the housing element update since the April 2022 draft EIR publication based on additional research, analysis, and information. Those refinements included downward adjustments of both the estimated units expected in some pipeline projects (development agreements and large projects) and underutilized and vacant sites, among others. These downward adjustments increased the proposed rezoning program to approximately 34,000 housing units from 20,000 housing units. It is noted that this amount includes a buffer in the housing element inventory of at least 15 percent more capacity than required per the regional housing needs allocation. The text has been revised to the number in the Site Inventory (October 2022, draft 4), 34,000 new housing units, as follows:

In accordance with housing element update Policy 20~~4~~ and in accordance with the sites inventory requirements under California Government Code sections 65583(c)(1)(A) and 65583.2(h), the housing element update will include a proposed rezoning program demonstrating how the city would meet its RHNA and affirmatively furthering fair housing laws. The proposed zoning program will identify specific changes to height, density, review processes, and development controls consistent with the housing element update that would accommodate approximately ~~20,000~~ 34,000 new housing units. This EIR may be used to streamline the environmental review for the adoption of the proposed rezoning program. The approximately ~~20,000~~ 34,000 new housing units to be accommodated in the proposed zoning program are a portion of the approximately 50,000 additional housing units projected by 2050 under the proposed action and evaluated in this EIR. In addition, the department anticipates that this EIR will be used to streamline the environmental review for future zoning and other land use control changes that would implement the objective of the housing element update to further support the production of an average of 5,000 housing units per year through 2050.

Draft EIR Figure 2-8 on draft EIR p. 2-28 has been revised to include approximately one percent more geography within the possible areas under consideration for housing sustainability districts than was previously included in the figure. The revised figure is provided on the following page.



G. Staff-Initiated Revisions to Plans and Policies Chapter (Draft EIR Chapter 3)

On draft EIR p. 3-2, the last paragraph has been revised as follows:

As such, the proposed action would not result in any direct physical changes to the environment. Instead, the housing element update would result in reasonably foreseeable indirect changes. Specifically, the department assumes that adoption of the housing element update would lead to future actions, such as planning code amendments to increase height limits along transit corridors and to modify density controls in low-density areas that are primarily located on the west and north sides of the city, designation of housing sustainability districts, removal of other government constraints on the maintenance, improvement, and development of housing, and approval of development projects consistent with the goals, policies, and actions of the housing element update.

On draft EIR p. 3-4, the first sentence of the third paragraph under “Air Quality Element” has been revised as follows:

The housing element update promotes an equitable distribution of housing throughout the city, which encourages development along transit corridors (Policies 20, 24, and 323).

On draft EIR p. 3-6, the first sentence of the last paragraph has been revised as follows:

As discussed in Section 4.2, Cultural Resources, the proposed goals (Goals 3 and 4) and policies (Policies 19, 20, 24, 25, and 3126) of the housing element update could result in physical effects related to unique neighborhood character, which in part derives from a neighborhood’s cultural and architectural heritage.

On draft EIR p. 3-8, the third paragraph has been revised as follows:

As such, the proposed action would not result in any direct physical changes to the environment or conflicts with the planning code, but would result in reasonably foreseeable changes. Specifically, the department assumes that adoption of the housing element update would lead to future actions, such as planning code amendments to increase height limits along transit corridors and to modify density controls in low-density areas that are primarily located on the west and north sides of the city, designation of housing sustainability districts, removal of other government constraints on the maintenance, improvement, and development of housing, and approval of development projects consistent with the goals, policies, and actions of the housing element update. The EIR identifies these reasonably foreseeable environmental impacts that could occur as a result of future actions that would implement the proposed action and development projects that would be consistent with it.

On draft EIR p. 3-12, the second paragraph under “ConnectSF” has been revised as follows:

The ConnectSF program consists of three phases: 1) developing a vision for what the city should look and feel like in 50 years; 2) assessing the city’s transportation needs and identifying transit concepts and street and freeway concepts that could bridge those gaps; and 3) prioritizing projects and determining funding

sources as well as developing and codifying transportation and related land use policies. The Transit Corridors Study and Streets and Freeways Study ~~are anticipated to be~~ was completed ~~by~~ in summer 2022.

On draft EIR p. 3-13, the bullets of the first full paragraph have been revised as follows:

- Ensure transportation investments advance equitable access to transit and are planned in parallel with increase in housing capacity to create well-connected neighborhoods consistent with the city's ConnectSF vision, and encourage sustainable trips in new housing (Policy ~~383~~).
- Strengthen interagency coordination for transportation, evaluating the existing and future needs of priority equity geographies, environmental justice communities, and well-resourced neighborhoods targeted for increased housing capacity, and plan for staffing and funding needed for these investments (e.g., general obligation bonds, federal grants). This includes delivering a network such that transit vehicles come as frequently as every five minutes along certain corridors, and for transit services ~~rail~~ consistent with the city's ConnectSF vision and its Transit Strategy (Policy ~~383~~.a).
- Restore, maintain, and optimize the existing transit system, particularly ~~prioritize implementation of~~ through SFMTA's 5-year Capital Improvement Program's Transit Optimization and Expansion Projects in well-resourced neighborhoods targeted for increased housing capacity (Policy ~~383~~.b).
- Restore and improve transit service as identified in the city's Transit Strategy, particularly for essential workers, transit-dependent people, and in priority equity geographies and environmental justice communities (Policy ~~383~~.c).
- Adopt requirements that encourage ~~sustainable trip choices using priority modes~~ in new housing and reduce transportation impacts from new housing. Such amendments may require certain new housing to include additional transportation demand management measures and driveway and loading operations plans, protect pedestrian, cycling, and transit-oriented street frontages from driveways, and reduce vehicular parking (Policy ~~383~~.d).

On draft EIR p. 3-14, the "Regional Transportation Plan" text has been removed as the region's transportation plan is incorporated with Plan Bay Area 2050 (Plan Bay Area 2050 is discussed on draft EIR p. 3-10):

Regional Transportation Plan

~~The 2035 Regional Transportation Plan prepared by the Metropolitan Transportation Commission is a policy document that outlines transportation projects for highway, transit, rail, and related uses through 2035 for the nine Bay Area counties.~~

~~As discussed in Section 4.4, Transportation and Circulation, regional transit service providers would experience increases in ridership due to future development consistent with the proposed action. This additional ridership would be related to trips between the housing units in the city and jobs and other destinations (e.g., shopping) outside of the city. These additional passengers would not result in substantial passenger delay to any one route as the riders would be spread among multiple lines, trains, and ferries,~~

~~representing a small percentage increase from 2035 midpoint or 2050 environmental baseline conditions. Therefore, the proposed action would not substantially delay regional transit.~~

~~Based on the above, the proposed action would not impede the implementation of the Regional Transportation Plan, nor would it be inconsistent with its overarching goals and principles.~~

H. Staff-Initiated Revisions to Environmental Setting and Impacts Chapter (Draft EIR Chapter 4)

On draft EIR p. 4-4, the first paragraph has been revised as follows:

As such, the housing element update would not result in any direct physical changes to the environment. Instead, the housing element update would result in reasonably foreseeable indirect changes. Specifically, the department assumes that adoption of the housing element update would lead to future actions, such as planning code amendments to increase height limits along transit corridors and modify density controls in low-density areas that are primarily located on the north and west sides of the city, designation of housing sustainability districts, removal of other government constraints on the maintenance, improvement, and development of housing, and approval of development projects consistent with the goals, policies, and actions of the housing element update. Therefore, this EIR identifies the reasonably foreseeable impacts of future actions that would implement the proposed goals, policies, and actions, including rezoning actions that would enable increased housing density.

On draft EIR p. 4-4, the paragraph under “Mapping Housing Growth” has been revised as follows:

This EIR includes figures that illustrate the differences in the anticipated housing production levels and distributions between the 2050 environmental baseline and the proposed action, as shown in Figure 2-11, p. 2-32, in Chapter 2, Project Description. The level and distribution of housing growth assumed under the 2050 environmental baseline and proposed action represent possible outcomes based on the modelling conducted by the department. These projected housing production levels and distributions informed the programmatic environmental impact analysis presented in this EIR. While the impact analysis in the EIR is based on these projected future conditions, the depictions are not intended to be precise maps of where future development would occur. Future housing development could occur in any areas of the city where zoning allows. Rather, the depictions are used to identify the types and magnitude of impacts anticipated from the increased density and redistribution of housing growth anticipated under the proposed action compared to the 2050 environmental baseline. Use of the state density bonus or other programs are part of existing zoning controls; the proposed action would not change those. Therefore, these are accounted for in the environmental baseline. The draft EIR adequately analyzes the growth that could occur with use of the state density bonus or other bonus programs as part of the citywide modeling that informed topics such as transportation, air quality, noise, and utility and service systems analyses.^{1a} Individual projects’ use of the state density bonus would not alter the overall growth studied as part of this draft EIR.

On draft EIR p. 4-4, footnote 1a has been added as follows:

1a Regarding other effects that are site specific, such as wind or shadow impacts, it would be speculative to analyze potential future height and/or density on any particular parcel when it cannot be known on which specific site any such density or height bonus might be sought in the future. The department would review future actions like potential future state density bonus projects.

On draft EIR p. 4-7, the first paragraph under “2035 Midpoint Analysis” has been revised as follows:

For transportation (transit delay and vehicle miles traveled), air quality, ~~and noise impacts,~~ and utilities and service systems, the EIR provides a midpoint (2035) analysis of anticipated physical environmental effects. The 2035 midpoint analysis is ~~only conducted for these transportation, air quality, and noise topics~~ because there is a potential for impacts to be worse in 2035 compared to 2050 due to planned transportation improvements and increasingly stringent emissions standards that would occur after 2035. The department conducted a 2035 midpoint analysis for some utility and service systems to understand the projected demand and timing for when new or expanded infrastructure may be necessary due to projected housing growth. The 2035 midpoint conditions analysis provides city decision makers an additional point to inform decision making, such as when and where to prioritize future transportation and another infrastructure facilities and improvements. This midpoint analysis also serves as a point of comparison to show how the potential impacts of the proposed action differ between 2035 and 2050.

I. Staff-Initiated Revisions to Effects Found Not to Be Significant Section (Draft EIR Section 4.1)

On draft EIR p. 4.1-19 (in the Land Use and Planning section), the first paragraph under Impact LU-1 has been revised as follows:

To meet the equity objectives, the housing element update would increase housing production and shift a greater share of anticipated growth from the east side of the city to well-resourced areas along transit corridors and low-density areas, that are primarily located on the west and north sides of the city. **Figure 2-9,** p. 2-30, in Chapter 2, Project Description, shows the projected density of housing units for future development consistent with the housing element update. Increased development along the transit corridors and in low-density residential districts within but not limited to well-resourced areas would not alter the physical layout of the city such that movement within or across the city would be obstructed.

On draft EIR p. 4.1-70 (in the Population and Housing section), the following text has been added above “Regional” as this legislation passed since the draft EIR was published:

Affordable Housing and High Road Jobs Act of 2022

The Affordable Housing and High Road Jobs Act of 2022 (adding sections 65912.100 seq.) allows for streamlined, ministerial approval for 100 percent affordable housing developments that meet certain objective standards (e.g., consistent with zoning), site criteria (e.g., located in a zone where office, retail, or parking are principally permitted; at least 75 percent of the perimeter of the site adjoins urban areas), and

labor requirements. The act also allows streamlined, ministerial approval for mixed-income housing developments, which must meet certain affordability standards (e.g., minimum 13 percent affordable housing), and with similar site criteria and labor standards as for 100 percent affordable housing developments. Mixed-income projects must be located on commercial corridors, which are defined as streets between 75 and 150 feet in width, and if located within 0.50 mile of a major transit stop, may have a minimum height of 65 feet and density of 80 units per acre. The act takes effect in July 2023. See Government Code 65912.100 et seq for a complete list of requirements.

On draft EIR p. 4.1-72 (in the Population and Housing section), the following paragraph has been added above “Environmental Impacts” as there has been an update to local ordinances since the draft EIR was published:

Density Exception in Residential Districts (Fourplex Ordinance)

In fall 2022, San Francisco adopted a “fourplex” ordinance that amends the planning code to provide a density limit exception to permit up to four residential units per lot, and up to six residential units per lot on corner lots, in all RH (Residential, House) zoning districts, subject to certain requirements (Board of Supervisors File no. 210866).

On draft EIR p. 4.1-74 (in the Population and Housing section), the first paragraph has been revised as follows:

The proposed action recommends equitable distribution of growth throughout the city, which would mean increased development in well-resourced areas. Examples of housing element update policies that are intended to increase development in well-resourced areas include Policies ~~17, 18, 19, 20, 21, 25 and 383~~. Examples of housing element update policies that encourage development along transit corridors include Policies 20, ~~24~~, and ~~323~~. The department assumes that adoption of the housing element update would lead to future actions, such as planning code amendments to increase height limits along transit corridors and modify density controls in low-density areas that are primarily located on the north and west sides of the city. Examples of housing element policies that encourage increased density include Policies 20, ~~25, 30~~ and ~~3126~~. These density-related strategies in the proposed action would increase the number of housing units that could be developed on each parcel compared to development under in the existing 2014 housing element.

On draft EIR p. 4-76 (in the Population and Housing section), the list of example policies has been revised as follows:

The housing element update is San Francisco’s first housing plan centered in racial and social equity. The majority of the update’s policies and actions focus on advancing equitable housing access, racial and social equity, and eliminating displacement. Specifically, Objective 3.c seeks to: “Eliminate community displacement within areas vulnerable to displacement.” Examples of housing element update policies that are intended to address displacement through various strategies such as tenant protections, preservation of

affordability, production of affordable housing, and advancing equitable access to housing resources and affordable units include:

- Policy 1. Minimize all no-fault and at-fault evictions for all tenants, and elevate direct rental assistance as an eviction protection strategy.
- Policy 2. Preserve affordability of existing subsidized housing, government-owned or cooperative-owned housing, or SRO hotel rooms where the affordability requirements are at risk or soon to expire.
- Policy 3. Acquire and rehabilitate privately-owned housing as permanently affordable to better serve residents. ~~Reform and support the City's acquisition and rehabilitation program to better serve areas and income ranges underserved by affordable housing options and areas vulnerable to displacement with unmet affordable housing needs.~~
- Policy 4. Facilitate the legalization ~~Preserve the affordability of~~ unauthorized dwelling units while improving their safety and habitability.
- Policy 5. Improve access to the available Affordable Rental and Homeownership units especially for disproportionately underserved racial and social groups ~~racial and social groups who have been disproportionately underserved or for American Indian, Black, Japanese, Filipino, and other communities directly harmed by past discriminatory government actions in the past including redlining, Redevelopment and Urban Renewal, the Indian Relocation Act or WWII Japanese incarceration based on a reparations framework.~~
- Policy 15. Expand permanently affordable housing investments in Priority Equity Geographies to better serve American Indian, Black, and other People of color within income ranges underserved, including extremely-, very low-, and moderate-income households.
- Policy 19. Enable low and moderate-income households, particularly American Indian, Black, and other people of color, to live and prosper in Well-resourced Neighborhoods by increasing the number of permanently affordable housing units.
- Policy 21. Prevent the potential displacement and adverse racial and social equity impacts of zoning changes, planning processes, or public and private investments especially for populations and in areas vulnerable to displacement. (Objectives: 3.c, 2.c, 4.c)

On draft EIR p. 4.1-89 (in the Greenhouse Gas Emissions section), the last sentence under "Short-Lived Climate Pollutant Regulations" has been revised as follows:

The air board and California's Department of Resources Recycling and Recovery (CalRecycle) are currently ~~developing regulations~~ implementing mechanisms to achieve the organic waste reduction goals under California Health and Safety Code, Sections 39730.5–39730.8 and California Public Resources Code, Chapter 13.1, Part 3, Division 30, Section 42652.

On draft EIR p. 4.1-110 (in the Recreation section), the impact statement Impact C-RE-1 has been revised as follows to be consistent with the significance determination in the analysis:

Impact C-RE-1: The proposed action, in combination with cumulative projects, would not result in a significant cumulative impact on recreation. (*Less than Significant with Mitigation*)

On draft EIR p. 4.1-222 (in the Hazards and Hazardous Materials section), the impact statement Impact HAZ-4 has been revised as follows to be consistent with the analysis (the significance determination is unchanged):

Impact HAZ-4: The proposed action could be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code section 65962.5 ~~and, as a result, but would not~~ create a significant hazard for the public or the environment due to regulations. (*Less than Significant*)

J. Staff-Initiated Revisions to Cultural Resources Section (Draft EIR Section 4.2)

On draft EIR p. 4.2-38, the last paragraph under “San Francisco Cultural Resources Survey” has been revised as follows:

San Francisco Cultural Resources Survey

The San Francisco Cultural Resources Survey (SF Survey) is a historic context-based, multi-year cultural resources survey lead by the department that will result in the identification, documentation, and evaluation of ~~sites and places~~ and resources of cultural, historical, and architectural importance across San Francisco. These places and resources include tangible aspects, such as buildings, structures, objects, sites, and districts, as well as intangible aspects, such as oral traditions, performing arts, social practices, festivals, and traditional crafts. SF Survey aims to document San Francisco’s ~~architectural heritage~~ built environment while elevating the need to acknowledge the intangible aspects of the city’s culture. This effort will be conducted through broad-scale, context-based research and make evaluations in consultation with community members for properties and assets with cultural and social associations. The results of SF Survey will help guide the department’s work on decision making for future landmark designations, heritage-based initiatives, environmental review, new development projects, area plans, and building permit applications ~~other work~~. As of 2022, SF Survey is proposed for completion by 2026.

On draft EIR p. 4.2-41, text in the third bulleted paragraph has been revised as follows and a new bullet has been added to the list:

- **Cultural Resources Field Survey, Research, and Evaluation:** ~~Historic Cultural~~ resource determinations will be provided for all non-previously surveyed historic-aged properties across the city (i.e., 45 years or older at the conclusion of the SF Survey [constructed through 1981]).⁹⁶ Survey efforts will include both desktop and field data collection followed by comprehensive consideration of applicable evaluative frameworks from historic context statements, information submitted by the public, and additional research to substantiate findings.
- **Findings and Adoption:** The historic preservation commission will hold public hearings on adoption of components of the Citywide Historic Context Statement and survey findings. Each property will be

assigned a California Historical Resource Status Code. The historic preservation commission may elect to adopt the findings with or without modifications, or they may take no action and direct the team to incorporate revisions or provide additional information. Once the historic preservation commission adopts the historic context statement and survey, the findings will be forwarded to the California Office of Historic Preservation and formalized.

On draft EIR p. 4.2-41, footnote 96 has been revised as follows:

- ⁹⁶ Under CEQA, the department typically reviews properties that are more than 45 years old. Using those dates, the threshold of 198~~19~~ was established for in-field survey work. The context statements typically include a 1989 date as a defining moment in the city's history and the start of a new period of rebuilding. The SF Survey may also evaluate potentially significant properties up until the present date.

On draft EIR pp. 4.2-43 and 4.2-43a, **draft EIR Table 4.2-1: Completed And Planned Historic Context Statements Informing the San Francisco Cultural Resources Survey** has been revised as shown on the following pages.

CULTURAL CONTEXTS (by status)

Adopted Contexts	In-Progress Contexts	In-Progress Data Collection	Planned Contexts
<ul style="list-style-type: none"> Japantown Cultural Heritage and Economic Sustainability Strategy (adopted 2014) LGBTQ Historic Context Statement (adopted 2015) Filipino Addendum to SoMa Historic Context Statement (adopted 2013) 	<ul style="list-style-type: none"> Latino Historic Context Statement African American Historic Context Statement Chinese-American Historic Context Statement Italian-American history documented through: <ul style="list-style-type: none"> North Beach Historic Context Statement Excelsior/Portola Historic Context Statement Russian-American Historic Context Statement Counter-Culture (Haight/Citywide National Register Multiple Property Documentation) 	<ul style="list-style-type: none"> Women's Rights Historic Context Statement Jewish American history documented through: <ul style="list-style-type: none"> Russian -American Historic Context Statement Excelsior Portola Historic Context Statement German <u>American</u> spreadsheet 	<ul style="list-style-type: none"> Irish American South Asian (India, Pakistan, Bangladesh, Sri Lanka) Southeast Asian (Thailand, Vietnam, Cambodia) Middle East/North Africa Pacific Islander
			Priority
			<ul style="list-style-type: none"> American Indian Historic Context Statement

ARCHITECTURAL CONTEXTS

Construction Methods	Architectural Styles	Architectural Styles (cont'd.)	Architects, Builders, Developers, and Landscape Architects' Biographies- Architecture, Planning, and Preservation Professionals- A Collection of Biographies
<ul style="list-style-type: none"> Rare Methods (i.e., Adobe, Skyscraper, Masonry Techniques) Unreinforced Masonry Buildings (adopted 1990) 	Early Settlement Era Styles (1848-c.1880) <ul style="list-style-type: none"> Late Adobe Vernacular/Folk Victorian Greek Revival Gothic Revival 	Architecture of the Progressive Era and Early 20th-Century (c.1895-c.1935) Progressive Era and Early Revival Styles (c.1890-c.1930) <ul style="list-style-type: none"> Edwardian Typology (Craftsman, Queen Anne, Prairie, Classical Revival) American and California Styles (Craftsman, Arts & Crafts, Prairie, Chicago Style, Early 20th-Century American Commercial, Sullivanesque, First Bay Tradition, Second Bay Tradition) Spanish and Mediterranean Revival Styles (Spanish Colonial Revival, Mediterranean Revival, Churrigueresque) Modernistic Styles (Art Deco, International, Streamline Moderne, WPA Art & Architecture) American and California Styles (Craftsman, Arts & Crafts, Beaux Arts, Early 20th Century Commercial) Early Revival Styles (Tudor Revival, Classical Revival, Colonial Revival, Dutch Colonial Revival, Georgian Revival, Mission Revival) 	<ul style="list-style-type: none"> Education, firm history, and known projects in SF and the Bay Area Women architects to be indexed Architects to be indexed by associated culture/heritage
	Gilded Age Styles (c.1870-c.1900) <ul style="list-style-type: none"> Italianate/Flat Front Italianate Queen Anne Stick/Eastlake Second Empire Richardsonian Romanesque 		
	Late 19th and Early 20th-Century Revival Styles (c.1890-1930) <ul style="list-style-type: none"> English Revival Styles (Elizabethan, Tudor, Late Tudor, Georgian Revival, Storybook, Gothic Revival) Classical Revival Styles (Beaux Arts, Classical Revival, Neo-Classical, Greek Revival) Colonial Revival Styles (Colonial, Dutch Colonial) European Revival Styles (Norman, French Provincial, Italian Renaissance Revival, Venetian Revival, Romanesque Revival, Roman Renaissance Revival) Globally-Inspired (non-European) Revival Styles (Moorish, Islam, Tiki) 		

Yellow text indicates under contract, in-progress, or completed documentation.

ARCHITECTURAL CONTEXTS (CONT'D.)

	Architectural Styles (cont'd.)	Architectural Styles (cont'd.)	
	<p>Bay Area Tradition Styles (1880-1980)</p> <ul style="list-style-type: none"> • First Bay Tradition • Second Bay Tradition • Third Bay Tradition <p>20th-Century Revival Styles (c.1915-c.1940)</p> <ul style="list-style-type: none"> • European Revival Styles (Storybook, French Provincial Revival, Italian Renaissance Revival, Spanish Colonial Revival, Mediterranean Revival, Churrigueresque) • Globally-Inspired (Non-European) Revival Styles (Moorish, Islamic, Tiki) <p>Modernistic and New Deal Era Styles (1925-1950)</p> <ul style="list-style-type: none"> • Art Deco • International • Streamline Moderne • WPA Art and Architecture 	<p>Modern Architecture and Landscapes (1935-1925-1970) (adopted 2011)</p> <ul style="list-style-type: none"> • Minimal Traditional, Contractor Modern, Mid-Century Modern, Googie, Contractor Mod., Eichlers, Ranch, Corporate/Miesian Modernism <p>Modern Addendum (1960-2000)</p> <ul style="list-style-type: none"> • New Formalism, Brutalism, Third Bay Tradition, Late French Provincial, Post-Modernism 	

Yellow text indicates under contract, in-progress, or completed documentation.

On draft EIR p. 4.2-53, the second sentence of the first paragraph has been revised as follows:

Figure 4.2-9 shows the locations of a portion of the known built-environment historic resources with existing or potentially ~~that have~~ significant social and cultural associations with marginalized communities.

On draft EIR p. 4.2-79, the text of policies 20, 24, and 26 have been revised, consistent with release of draft 4 of the housing element update, as follows:

- Policy 20: Increase mid-rise and small multi-family housing types by adopting zoning changes or density bonus programs in well-resourced neighborhoods and adjacent lower-density areas near transit, including along SFMTA Rapid Network and other transit, ~~and throughout lower-density areas, by adopting zoning changes or density bonus programs.~~
- Policy 24: ~~Support~~ Enable mixed-income development projects to maximize the number of permanently affordable housing constructed, in balance with delivering other community benefits that advance racial and social equity.
- Policy ~~3126~~: Facilitate small and mid-rise multi-family buildings ~~as a prominent housing type~~ that private development can deliver to serve middle-income households without deed restriction, including through adding units in expansion or demolition of existing lower density areas housing, or by adding accessory dwelling units (ADUs).

On draft EIR p. 4.2-79, the title of Policy 12 has been revised, consistent with release of draft 4 of the housing element update, as follows:

- Policy 12: Invest in ~~cultural anchors~~ and expand access to cultural anchors, land, and spaces that are significant to hold cultural importance for American Indian, Black, Japanese, Filipino, and other communities directly harmed by past discriminatory government actions ~~in the past~~ including redlining, ~~Redevelopment and Urban Renewal~~, the Indian Relocation Act or WWII Japanese incarceration ~~to as a means of~~ redressing histories of dispossession, social disruption, and physical displacement ~~based on a reparations framework.~~

On draft EIR p. 4.2-79, the action 12f has been revised, consistent with release of draft 4 of the housing element update, as follows:

- Action 12f: Fund the development of cultural spaces that serve communities harmed as described under this policy, using potential new funding sources such as the mitigation fund referenced under Policy ~~4237~~, action (c) or community facilities fees

On draft EIR pp. 4.2-80 and 4.2-81, the policy number and a minor edit to the policy name has been revised, consistent with release of draft 4 of the housing element update, as follows:

- Policy ~~4237~~: Support cultural uses, activities, and architecture that sustain San Francisco's ~~dynamic and unique~~ diverse cultural heritages.

- Action ~~3742~~.a: Utilize the Cultural Districts program to support building permanently affordable housing, along with other housing development and neighborhood investments that include cultural activities, uses, traditions, and spaces, in coordination with Policy 12.
- Action ~~3742~~.b: Increase staff allocation within the Mayor's Office of Housing and Workforce Development, Office of Economic and Workforce Development, Department of Public Works, Arts Commission, and Planning to create a more robust, sustained, and effective Cultural Districts program, provide more direct support for the development and implementation of their respective Cultural History Housing and Economic Sustainability Strategies.
- Action ~~3742~~.c: Study creation of a cultural resource mitigation fund that could be paid into by projects that impact cultural resources to support cultural resource protection and preservation throughout the city, prioritizing funding the development of cultural spaces as described in Policy 12, action (f).
- Action ~~3742~~.d: Designate historically and culturally significant buildings, landscapes, and districts for preservation using the Citywide Cultural Resource Survey, planning code articles 10 and 11, and state and national historic resource registries to ensure appropriate treatment of historic properties that are important to the community and unlock historic preservation incentives for more potential housing development sites.
- Action ~~3742~~.e: Promote the use of the Retained Elements Special Topic Design Guidelines to development applicants to address sites where conserving parts of buildings sustains cultural identity and proposed housing serves the community.
- Action ~~3742~~.f: Establish priority building permit and entitlement Planning Department review processes for multi-family residential development projects that rehabilitate or adaptively reuse existing buildings to support sustainable building practices, per Policy 34, while preserving cultural resources.
- Action ~~3742~~.g: Develop objective design standards for the treatment of historic buildings and districts to provide consistent and efficient regulatory review that facilitates housing development approvals and protects the City's cultural and architectural heritages.
- Action ~~3742~~.h: Promote historic preservation and cultural heritage incentives, such as tax credit programs and the State Historical Building Code, for use in residential rehabilitation projects through general outreach, interagency collaboration with the Mayor's Office of Housing and Workforce Development and Office of Economic and Workforce Development, building trades collaboration, educational materials, community capacity building efforts, and through the regulatory review process.
- Action 42.i: Revise Urban Design Guidelines to provide guidance on including signage, lighting, public art, historical interpretation and educational opportunities in housing development projects

in a manner that reflects neighborhood history and culture, prioritizing the acknowledgement and representation of American Indian history and culture, in coordination with State requirements.

- Action ~~374~~2.j: Complete the Citywide Cultural Resources Survey, including the citywide historic context statement, with ongoing community engagement to identify important individual historic or cultural resources and districts.
- Action ~~374~~2.k: Complete the Heritage Conservation Element of the General Plan in order to bring clarity and accountability to the City's role in sustaining both the tangible and intangible aspects of San Francisco's cultural heritage.

On draft EIR p. 4.2-81, the first full paragraph after the bulleted list has been revised as follows:

Considered in total, the goals, policies, and actions of the proposed action would shift an increased share of the city's future housing growth to transit corridors and low-density residential districts within but not limited to, well-resourced areas; that are primarily located on the west and north sides of the city. Well-resourced areas primarily lie within the western half of San Francisco and are located in the following neighborhoods: Castro/Upper Market, Glen Park, Golden Gate Park, Haight/Ashbury, Hayes Valley, Inner Richmond, Inner Sunset, Japantown, Lakeshore, Lincoln Park, Lone Mountain/USF, Marina, Nob Hill, Noe Valley, North Beach, Outer Richmond, Pacific Heights, Potrero Hill, Presidio, Presidio Heights, Russian Hill, Seacliff, Sunset/Parkside, Twin Peaks, Western Addition, and West of Twin Peaks. **Figure 2-1**, p. 2-4, in Chapter 2, Project Description, depicts the locations of well-resourced areas.

K. Staff-Initiated Revisions to Transportation and Circulation Section (Draft EIR Section 4.4)

On draft EIR pp. 4.4-97 to 4.4-98, the bullet list in the third paragraph has been revised as follows:

- Policy ~~383~~: Ensure transportation investments advance equitable access to transit and are planned in parallel with increase in housing capacity to create well-connected neighborhoods consistent with the city's ConnectSF vision, and encourage sustainable trips in new housing.
- Policy ~~383~~.a: Strengthen interagency coordination for transportation, evaluating the existing and future needs of priority equity geographies, environmental justice communities, and well-resourced neighborhoods targeted for increased housing capacity, and plan for staffing and funding needed for these investments (e.g., general obligation bonds, federal grants). This includes delivering a network such that transit vehicles come as frequently as every five minutes along certain corridors, and for transit services ~~rail~~ consistent with the city's ConnectSF vision and its Transit Strategy.
- Policy ~~383~~.b: Restore, maintain, and optimize the existing transit system, particularly prioritize implementation of SFMTA's 5-year Capital Improvement Program's Transit Optimization and Expansion Projects in well-resourced neighborhoods targeted for increased housing capacity.

- Policy 383.c Restore and improve transit service as identified in the city's Transit Strategy, particularly for essential workers, transit-dependent people, and in priority equity geographies and environmental justice communities.
- Policy 383.d Adopt requirements that encourage ~~sustainable trip choices using priority modes~~ in new housing and reduce transportation impacts from new housing. Such amendments may require certain new housing to include additional transportation demand management measures and driveway and loading operations plans, protect pedestrian, cycling, and transit-oriented street frontages from driveways, and reduce vehicular parking.

On draft EIR p. 4.4-120, the first paragraph has been revised as follows:

The proposed housing element update includes a policy to adopt requirements that encourage sustainable trip choices in new housing and reduce transportation impacts from new housing (policy 383.d). Such amendments may require certain new housing to include additional transportation demand management measures and reduce vehicular parking.

On draft EIR p. 4.4-134, the third paragraph under Impact C-TR-3 has been revised as follows:

Between 2020 and 2050 cumulative conditions, planned new transit-only lanes and supporting features identified in Figures 4.4-7a and 4.4-7b would maintain or reduce transit travel times along the representative corridors. On corridors where transit network improvements are not planned, transit travel times would increase between 2020 and 2050 cumulative conditions (i.e., transit would take longer). The future residential development consistent with the proposed action would overlap with other cumulative residential and nonresidential development in the city in locations where substantial increases in transit delay would occur (e.g., South of Market, Downtown). Therefore, there would be a significant cumulative transit delay impact for both local and regional routes due to the proposed action in conjunction with overall citywide growth. The proposed action would contribute considerably to this significant cumulative impact because housing units consistent with the proposed action could be developed in these locations. Mitigation Measures M-TR-4a through M-TR-4c would reduce or minimize the severity of transit delay associated with future development. However, due to the uncertainty about the adoption of these measures and their effectiveness to fully reduce impacts, it is not likely that these measures would reduce the transit delay impacts to less-than-significant levels. For these reasons, the proposed action would contribute considerably to significant cumulative transit delay impacts that would be significant and unavoidable with mitigation.

L. Staff-Initiated Revisions to Noise and Vibration Section (Draft EIR Section 4.5)

On draft EIR p. 4.5-51 under Impact NO-2, the fourth paragraph has been revised as follows:

While the above programmatic analysis of operational noise impacts from future development consistent with the housing element update concludes that a significant impact would occur, the characteristics of any

given future development project are dependent on site- and project-specific conditions that are difficult to generalize across building types. Because the specific characteristics of each future development consistent with the proposed action and the required equipment information (e.g., specific HVAC and mechanical systems) are not known, future projects would be required to undergo project-level analysis at the time a project is proposed. In general, projects that meet any of the following screening criteria ~~may~~ would not have significant operational noise impacts and would ~~not~~ require quantitative operational noise impact analysis:

- Would ~~not~~ result in a doubling of the baseline number of vehicular trips per day²⁵
- Would ~~not~~ have an occupied floor greater than 75 feet in height²⁶
- Would ~~not~~ include more than two backup generators

M. Staff-Initiated Revisions to Air Quality Section (Draft EIR Section 4.6)

The air quality cancer risk analysis was updated to specifically evaluate the cancer risk to workers and the PM_{2.5} concentration analysis was updated to consider PM_{2.5} concentrations from construction dust and compliance with the city's dust control ordinance. This updated analysis is presented in a new Appendix I.4 and requires minor revisions to the air quality chapter noted below. Additionally, Appendix I.3, Tables 13.2 and 15.2 were revised to reflect corrected modeling distances which reduced PM_{2.5} concentration values. The text revisions correct minor errors, clarify, expand, or update the information presented in the draft EIR. The revised text does not provide new information that would result in any new significant impact not already identified in the EIR or a substantial increase in the severity of an impact identified in the EIR that cannot be mitigated to less than significant with implementation of identified mitigation measures. Thus, none of the text revisions would require recirculation pursuant to CEQA Guidelines section 15088.5. In the revisions shown below and in Appendix I.3, deleted text is shown in strikethrough and new text is double-underlined.

On draft EIR p. 4.6-7, the first paragraph under "Nitrogen Dioxide" has been revised as follows:

NO₂ is a reddish-brown gas that is a byproduct of combustion processes. Automobiles and industrial operations are the main sources of NO₂. Aside from its contribution to ozone formation, NO₂ can increase the risk of acute and chronic respiratory disease and reduce visibility. NO₂ may be visible as a coloring component of the air on high-pollution days, especially in conjunction with high ozone levels. The current state one-hour standard for NO₂ (0.18 ppm) is being met in San Francisco. In 2010, the U.S. EPA implemented a new one-hour NO₂ standard (0.10 ppm), as presented in Table 4.6-2, p. 4.6-4. ~~Currently, the air resources board is recommending that the air basin be designated as an attainment area for the new standard~~ The air basin is currently designated as an unclassifiable/attainment area for the one-hour standard.⁸ As shown in Table 4.6-1, p. 4.6-3, this new federal standard was not exceeded at the San Francisco station between 2016 and 2020.

On draft EIR p. 4.6-7, footnote 8 has been revised as follows:

- ⁸ ~~California Air Resources Board, Recommended Area Designations for the 2010 Nitrogen Dioxide Standards, Technical Support Document, January 2011, <https://www.epa.gov/sites/production/files/2016-04/documents/09carec2.pdf>, accessed March 24, 2022.~~
- California Air Resources Board, State Implementation Plan Revision for Federal Nitrogen Dioxide Standard Infrastructure Requirements (October 2012), accessed October 21, 2022, <http://www.arb.ca.gov/desig/no2isip.pdf>.

On draft EIR p. 4.6-19, the first paragraph under “Sensitive Receptors” has been revised as follows:

Air quality does not affect every individual in the population in the same way. Some groups are more sensitive to adverse health effects than others. The population subgroups that are sensitive to the health effects of air pollutants include the elderly and the young; those with higher rates of respiratory disease, such as asthma and chronic obstructive pulmonary disease; and those with other environmental or occupational health exposures that affect cardiovascular or respiratory diseases. The factors responsible for variations in exposure are also often similar to factors associated with greater susceptibility to air quality health effects. For example, lower-income residents may be more likely to live in substandard housing near industrial or roadway sources of air pollution. The air district defines *sensitive receptors* as children, adults, and seniors who occupy or reside in residential dwellings, schools, day-care centers, hospitals, or senior-care facilities. ~~Although workers may~~ Workers are not always be considered sensitive receptors because all employers must follow regulations set forth by the Occupational Safety and Health Administration to ensure the health and well-being of their employees. ³⁵ off-site workers (workers near a proposed project) are conservatively considered sensitive receptors in this analysis. Residential areas are considered more sensitive to air quality conditions compared to commercial and industrial areas because people generally spend longer periods of time at their residences, with associated greater exposures to ambient air quality conditions.

On draft EIR pp. 4.6-36 and 4-6-37, the last paragraph under “Fugitive Dust” has been revised as follows:

Fugitive dust⁵⁹ emissions are typically generated during construction. However, studies have shown that the application of best management practices (BMPs) at construction sites significantly controls fugitive dust.⁶⁰ Individual measures have been shown to reduce fugitive dust by anywhere from 30 to 90 percent.⁶¹ For example, wetting down areas of soil improvement operations three times per day yields a 61 percent reduction in construction dust from those activities and covering haul trucks with a tarpaulin can reduce dust from haul trucks by 91 percent.^{61a} The Construction Dust Control Ordinance requires a number of fugitive dust control measures, including the above, to be implemented to ensure that construction projects do not result in visible dust. Compliance with the Construction Dust Control Ordinance is the basis for determining the significance of fugitive dust emissions.

On draft EIR p. 4.6-37, footnote 61a has been added as follows:

^{61a} South Coast Air Quality Management District, Fugitive Dust Control Measures, <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies/fugitive-dust>, accessed September 28, 2022.

On draft EIR p. 4.6-37, the paragraph following the bulleted list has been revised as follows:

Impact AQ-3 and Impact AQ-4 address construction and operational criteria air pollutant impacts of future actions consistent with the housing element update, respectively. Impact AQ-5 also includes construction dust in the estimates of PM_{2.5} concentrations and accounts for compliance with the Construction Dust Control Ordinance.

On draft EIR pp. 4.6-37 and 4.6-38, the last paragraph has been revised as follows:

In addition, the EIR includes a quantitative analysis of TAC emissions that could result from the future construction and operation of the types of buildings anticipated consistent with the proposed action. Future development projects that require heavy-duty diesel vehicles and equipment, generate dust during construction, as well as projects that include stationary sources, such as backup diesel generators, would result in emissions of DPM and possibly other TACs that could affect nearby sensitive receptors. Construction activities could also emit fugitive dust and contribute to local particulate matter concentrations. Vehicle traffic generated by development projects could also result in emissions of DPM and other TACs, but to a lesser degree.

On draft EIR p. 4.6-40, the last sentence of the first partial paragraph has been revised as follows:

~~Appendix~~ Appendices I.3 and I.4 of this EIR provides additional information on the types of buildings that were analyzed.

On draft EIR p. 4.6-40, the following reference in the third paragraph has been revised as follows:

The construction assumptions are based on datasets from previously analyzed projects and consider the construction phases (e.g., demolition, grading, foundation construction), the duration of each phase, the inventory of construction equipment, truck trips, and excavation and fill (see Appendices I.1, ~~and I.3, and I.4~~ for a full list of assumptions).

On draft EIR p.4.6-40, the last paragraph has been revised as follows:

The vehicle activity and building type assumptions described above, and detailed in Appendices I.1, I.2, ~~and I.3, and I.4~~, were used to inform the air quality impact analysis, which is included below.

On draft EIR p. 4.6-42, the fourth paragraph has been revised as follows:

Policies in the housing element update provide a framework of support for the transportation control measures; specifically, Policy 20 encourages multi-family development in key transit areas; Policy 37~~2~~ aims to facilitate neighborhoods that reduce the need for vehicular travel; Policy 38~~3~~ would ensure that access to transit is planned in parallel with housing development and encourage trips for new housing that are made

by walking, bicycling, transit, and carpooling. All of these policies would supplement the air district's goals to reduce transportation-related emissions.

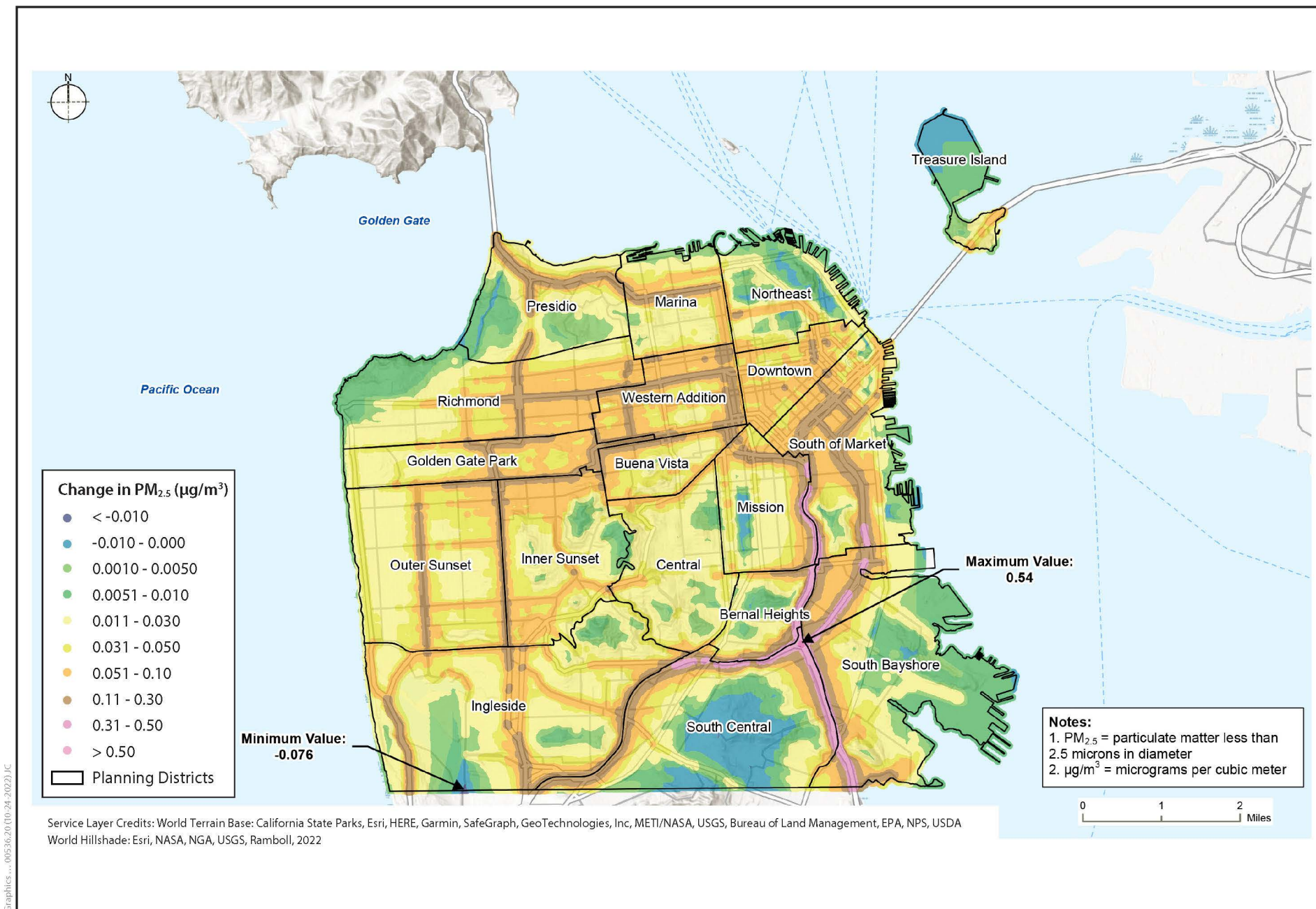
On draft EIR p. 4.6-43, the first partial paragraph has been revised as follows:

For existing housing in the city, Policy ~~39~~⁴ from the housing element update seeks to create electric conversion policies to transition existing homes from the use of gas appliances to electric ones, and this policy would also support measure BL2.

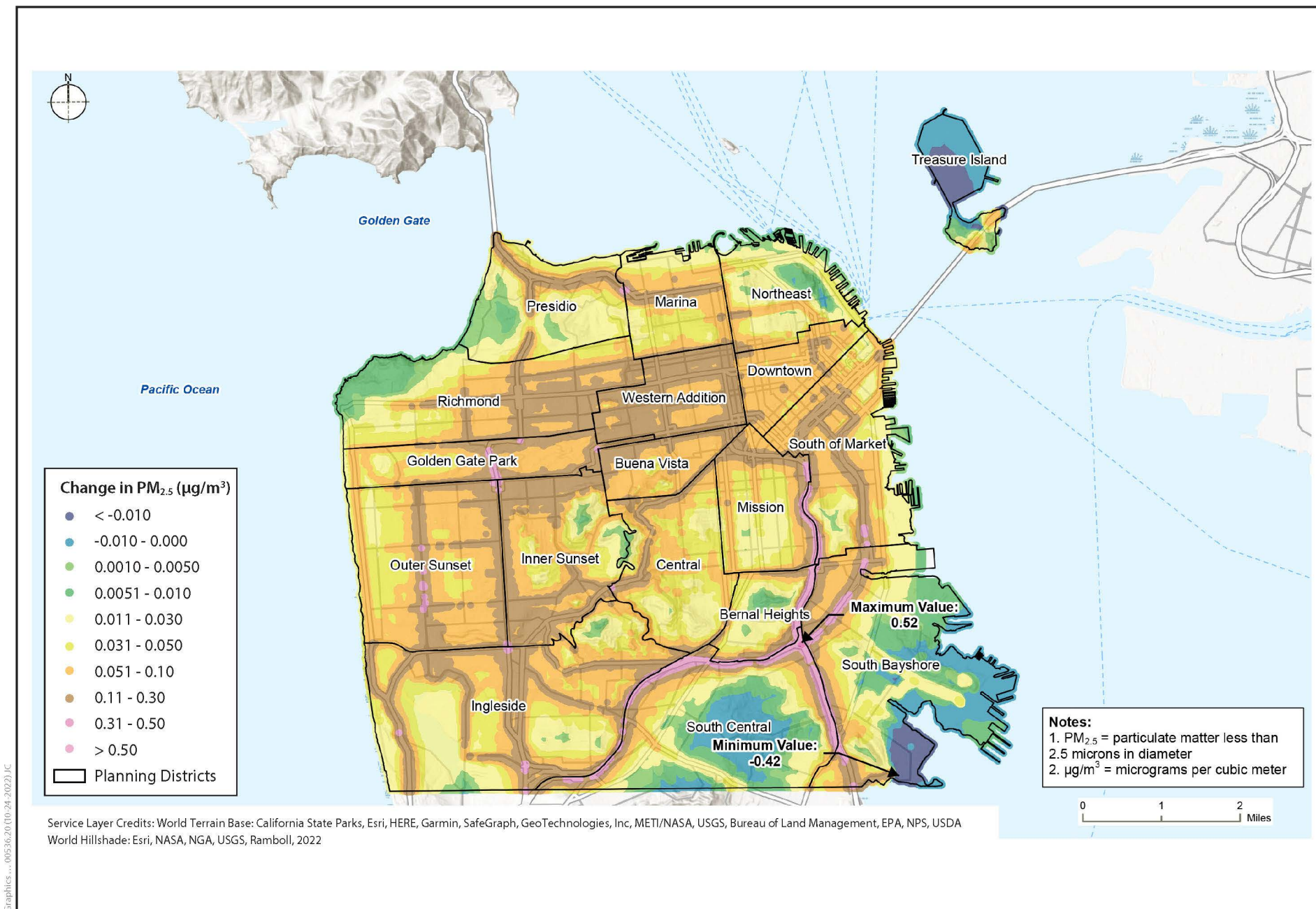
On draft EIR p. 4.6-44, the first partial paragraph has been revised as follows:

The housing element update would also be consistent with the Clean Air Plan's goal of protecting public health through Policy ~~40~~³⁵, which emphasizes the need to enforce and improve planning processes and building regulations to ensure a healthy environment. This policy would involve identifying public health needs by engaging with the community and developing notification processes in areas that include polluting sources.

The legend of **draft EIR Figure 4.6-7** on draft EIR p. 4.6-59 has been revised. The revised figure is provided on the following page.



The legend of **draft EIR Figure 4.6-9** on draft EIR p. 4.6-62 has been revised. The revised figure is provided on the following page.



On draft EIR p. 4.6-65, text in the second paragraph has been revised as follows:

Typical construction activities include demolition, site preparation, excavation, drainage work, utility installations, foundation work, building construction, exterior finishing, and sitework and paving (refer to Appendix Appendices I.3 and I.4 for additional detailed information on the construction assumptions used for the building types analyzed).

On draft EIR p. 4.6-65, text in the third paragraph has been revised as follows:

Project-specific information on the number of generators and their size was based on previously analyzed projects or reasonable assumptions, which can be found in Appendices I.1, and I.3, and I.4.

On draft EIR p 4.6-66, text in the first partial paragraph has been revised as follows:

Each parameter used in the analysis is summarized in Appendix Appendices I.3 and I.4.

On draft EIR p. 4.6-66, text in the second full paragraph has been revised as follows:

The complete results of the quantitative analysis for each building type analyzed is provided in Appendix Appendices I.3 and I.4.

On draft EIR p 4.6-67, text in the second full paragraph has been revised as follows:

With construction and operation of a 240-foot-tall building providing 495 dwelling units, the $PM_{2.5}$ concentration at 98 feet from the project site would be 1-10.83 $\mu g/m^3$. If the receptor is in the Downtown planning district, an area where total $PM_{2.5}$ concentration are projected to be greater than $10 \mu g/m^3$, the receptor would be located in the APEZ where pollutant concentrations would be elevated. The $PM_{2.5}$ concentration of 1-10.83 $\mu g/m^3$ would represent a significant increase because the $PM_{2.5}$ threshold of $0.2 \mu g/m^3$ would apply at this receptor. This would be a significant impact.

On draft EIR p. 4.6-67, the first full paragraph under “Cancer Risk” has been revised as follows:

The following is a hypothetical example of cancer risks at sensitive receptors resulting from a future development consistent with the proposed action. With construction and operation of a 240-foot-tall building providing 495 housing units, the cancer risk at a residential receptor 98 feet from the project site would be 270 per one million persons exposed. The cancer risk for a worker receptor at 98 feet from the project site would be 24 per one million persons exposed. The cancer risk for a worker receptor at the same location as a residential receptor is substantially lower than that for a residential receptor because the exposure parameters for residents include several factors that produce higher cancer risk results. For example, residential receptors are assumed to be exposed to air pollutants for the duration of their time at home, which for ages under 16 is 24 hours per day, whereas workers are assumed to be exposed only during their work hours. If these is receptors were located is in the Downtown planning district, an area where the total cancer risk is projected to be greater than 100 per one million persons exposed, the receptor would be located in an APEZ where health risks would be elevated. As such, the cancer risk of 270 and 24 per one million persons exposed for residents and workers, respectively, would be a significant increase because the

cancer risk threshold of 7.0 per one million persons exposed would apply at this receptor. This would be a significant impact.

On draft EIR p. 4.6-68, text in the first partial paragraph has been revised as follows:

The project-level analysis would include an evaluation that considers: the existing background health risk, project characteristics compared to the seven building types analyzed here and in ~~Appendix~~Appendices I.3 and I.4, or other similar projects where a quantitative health risk analysis has been conducted to determine the project's health risk contribution, and location of nearby sensitive receptors.

On draft EIR p. 4.6-69, the first three full paragraphs have been revised as follows:

However, it is possible to quantify the effectiveness of implementation of Mitigation Measures M-AQ-3 and M-AQ-5. Using the same example from above, for a 240-foot-tall building with 495 housing units, at a receptor that is 98 feet from a hypothetical project site, PM_{2.5} concentrations would be reduced to 0.1±3 µg/m³ accounting for dust control measures required by the dust control ordinance and with Mitigation Measures M-AQ-3 and M-AQ-5. The mitigation would reduce the impact to a less-than significant level for sensitive receptors located in the APEZ because the PM_{2.5} contribution from the future development project would be below 0.2 µg/m³. For receptors that are closer to the project site, however, the PM_{2.5} increase could be above 0.2 µg/m³. For example, for receptors within the APEZ and located about 16 feet from construction and operation of a 240-foot-tall building with 495 housing units, PM_{2.5} emissions would exceed the significance threshold at 0.2231 µg/m³. In this circumstance, PM_{2.5} emissions would be significant and unavoidable.

With respect to cancer risk, at a residential receptor that is 98 feet from a hypothetical project site, the cancer risk would be reduced to 31 per one million persons exposed and the cancer risk for a worker would be 2.8 per one million persons exposed with implementation of Mitigation Measures M-AQ-3 and M-AQ-5. For receptors in the APEZ, the mitigation would not reduce the residential receptor impact to a less-than-significant level because the cancer risk would remain above 7.0 per one million persons exposed. However, the mitigation measures would be sufficient to reduce the worker cancer risk to levels below 7.0 per one million persons exposed, reducing the impact to a less-than-significant level. For receptors that are closer to the project site, the cancer risk would be higher.

The quantitative analysis provided for each building type analyzed in ~~Appendix~~Appendices I.3 and I.4 can be used as a screening tool to determine whether impacts would be significant at the specific sensitive receptors in the vicinity of a project. ~~Appendix~~Appendices I.3 and I.4 includes unmitigated PM_{2.5} concentration and cancer risk results from construction and operation of multiple building types and at increasing distances from the building. To use the results in ~~Appendix~~Appendices I.3 and I.4 to demonstrate less-than-significant impacts, future projects would need to identify the applicable building type from the list in ~~Appendix~~Appendices I.3 and I.4, the distance to the closest sensitive receptors, and the existing background health risks at the sensitive receptor (from the citywide health risk assessment). If a future project can demonstrate that unmitigated construction and operational PM_{2.5} and cancer risk impacts would be less than significant at the corresponding receptor distances and that the project would not result in a

considerable contribution to cumulative health risks, then Mitigation Measures M-TR-4a, M-AQ-3 and M-AQ-5 would not be required.

On draft EIR p. 4.6-70, the third full paragraph has been revised as follows:

The purpose of the analysis the of future development is to inform readers about potential impacts of future development that may occur as a result of the proposed action; however, as noted above, many variables determine the significance of PM_{2.5} and cancer risk impacts that cannot be comprehensively evaluated in this analysis. In the example provided, with the use of Tier 4 equipment for construction and emergency generators (Mitigation Measures M-AQ-3 and M-AQ-5), PM_{2.5} concentrations at 98 feet from construction and operation of a 240-foot-tall building with 495 housing units would be reduced to below the threshold of 0.2µg/m³ for receptors located in APEZ, but the residential cancer risk would remain significant at 31 in one million persons exposed.

N. Staff-Initiated Revisions to Wind Section (Draft EIR Section 4.7)

On draft EIR p. 4.7-11, the second sentence of the fourth paragraph has been revised as follows:

Consistent with current practice, the department will evaluate all future development projects consistent with the proposed action to determine if they would have a significant wind impact when required under CEQA. If determined applicable, All a 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). If the qualified expert determines that wind-tunnel testing is required due to the potential for a new or worsened wind hazard exceedance, such testing would be undertaken in coordination with department staff, pursuant to Mitigation Measure M-WI-1a. Based on the results of project-level wind tunnel testing required under Mitigation Measure M-WI-1a, Mitigation Measure M-WI-1b would also apply to projects when necessary.

O. Staff-Initiated Revisions to Other CEQA Considerations (Draft EIR Section 5)

On draft EIR p. 5-1, the first sentence of the third paragraph under “A. Growth-Inducing Impacts” has been revised as follows:

With respect to indirectly inducing growth in the city, as discussed in Chapter 2, Project Description, the department assumes that adoption of the housing element update would lead to future actions, such as planning code amendments to increase height limits along transit corridors and to modify density controls in low-density areas that are primarily located on the west and north sides of the city, designation of housing sustainability districts, removal of other government constraints on the maintenance, improvement, and

development of housing, and approval of development projects consistent with the goals, policies, and actions of the housing element update.

On draft EIR pp. 5-2 and 5-3, the last bullet has been revised as follows:

- Significant impacts would remain significant and unavoidable, even with implementation of mitigation measures, for the following topics: cultural resources (project-level and cumulative: built-environment historic resources), transportation and circulation (project-level and cumulative: transit delay and loading), noise and vibration (project-level: construction noise, operational noise; cumulative: construction noise), air quality (project-level: criteria pollutants; project-level and cumulative: exposure of sensitive receptors to substantial levels of fine particulate matter and toxic air contaminants), wind, shadow, and utilities and service systems (wastewater facilities).

P. Staff-Initiated Revisions to Alternatives Chapter (Draft EIR Chapter 6)

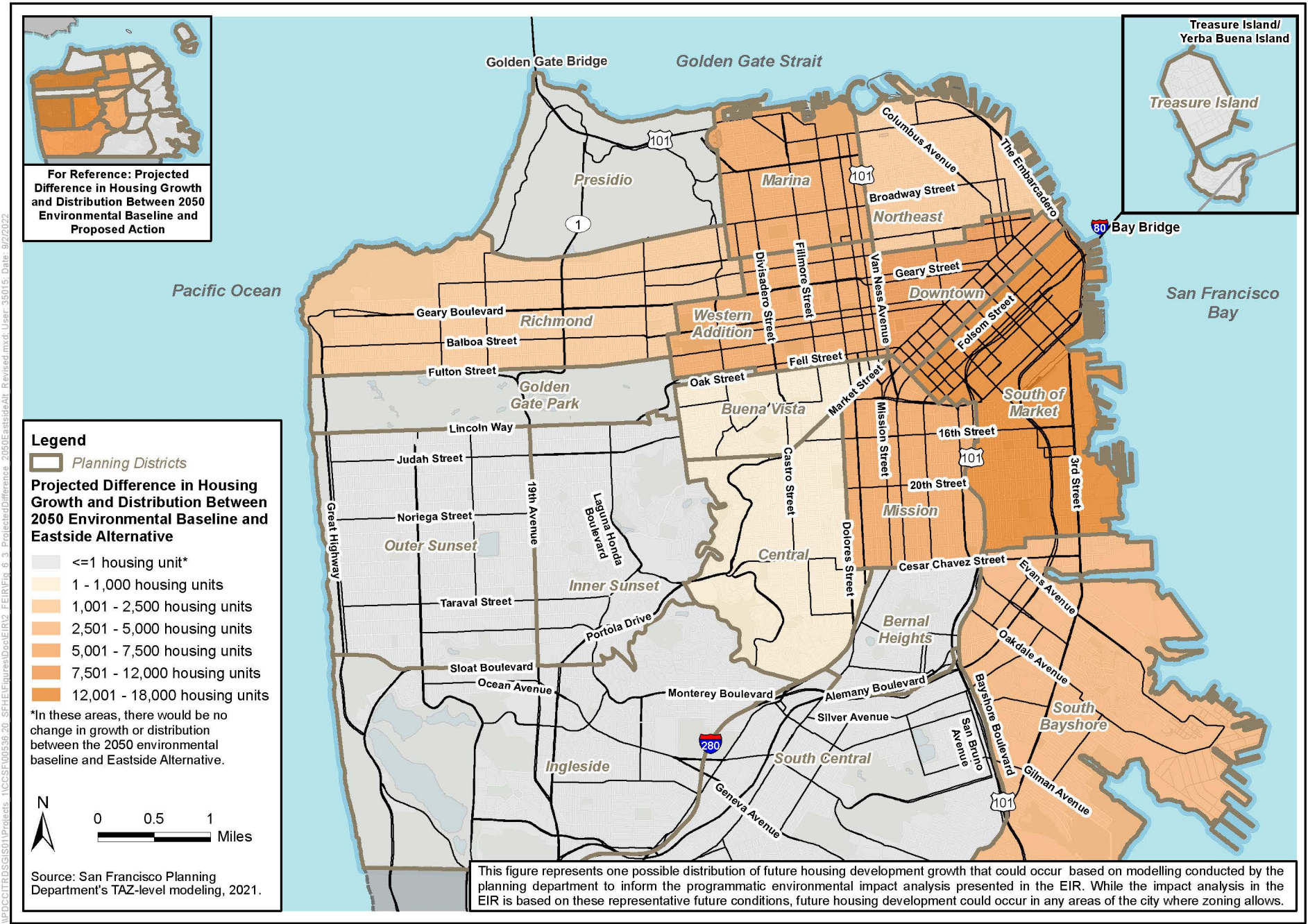
As noted in the errata dated May 19, 2022, the following figures are revised: **draft EIR Figure 6-3** on p. 6-9, **draft EIR Figure 6-5** on p. 6-13, **draft EIR Figure 6-7** on p. 6-16, and **draft EIR Figure 6-9** on p. 6-19. The text under the inset map was revised to read “2050 Environmental Baseline” instead of “2020 Conditions.” The revised figures are provided on the following pages.

On draft EIR p. 6-40, the impact statement Impact HAZ-4 has been revised as follows to be consistent with the analysis (the significance determination is unchanged):

Impact HAZ-4: The proposed action could be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code section 65962.5 ~~and, as a result, but would not~~ create a significant hazard for the public or the environment due to regulations. (LTS)

On draft EIR p. 6-106, the impact statement Impact HAZ-4 has been revised as follows to be consistent with the analysis (the significance determination is unchanged):

Impact HAZ-4: The proposed action could be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code section 65962.5 ~~and, as a result, but would not~~ create a significant hazard for the public or the environment due to regulations. (LTS)



\\PDC\TR\GIS\GIS\Projects_1\CCSF\00536-20_SFHE\Figures\Doc\EIR2_SFHE\Fig 6-5_ProjectedDifference_PreservationAlt_Rev016.mxd User: 35015 Date: 8/2/2022

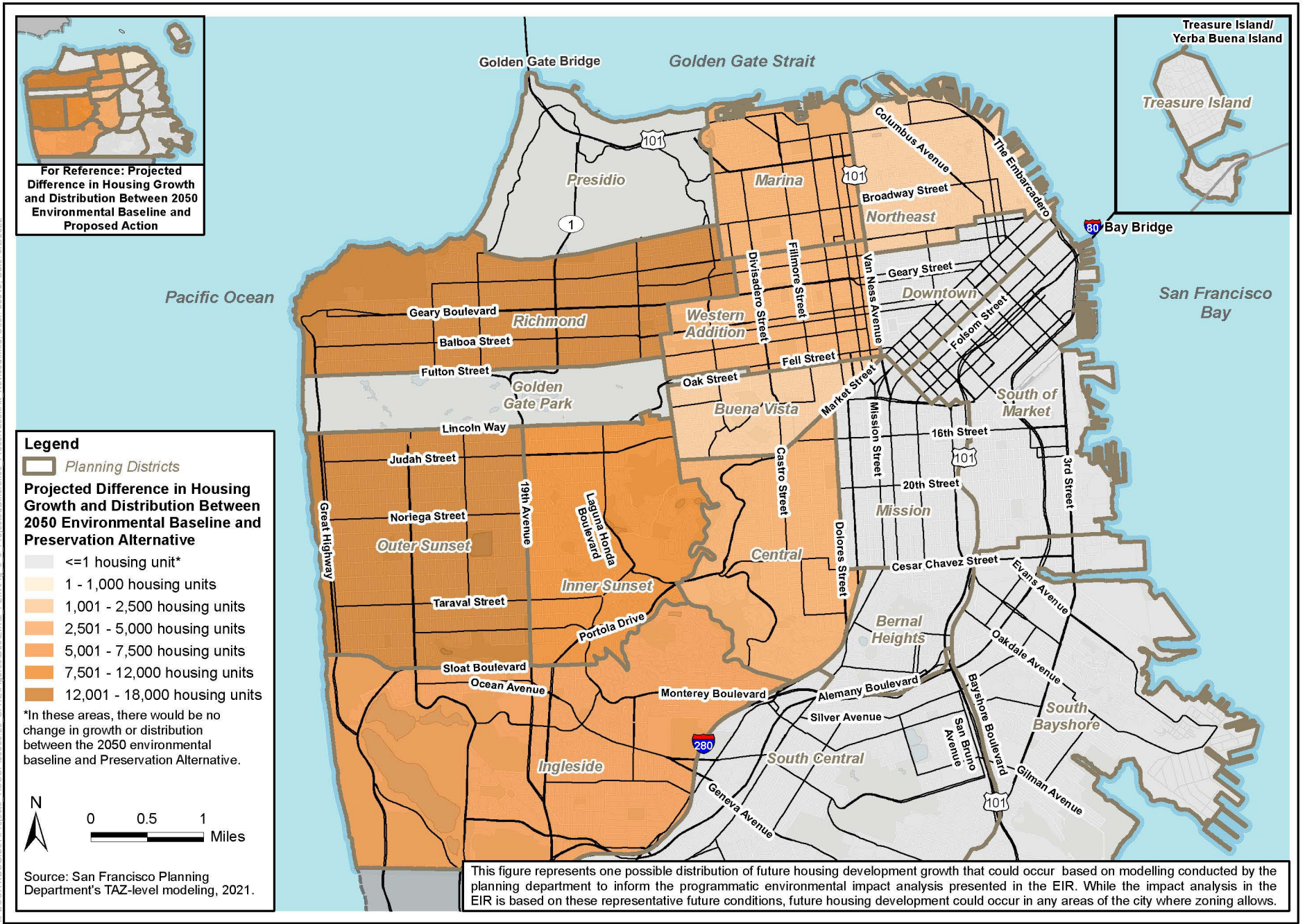
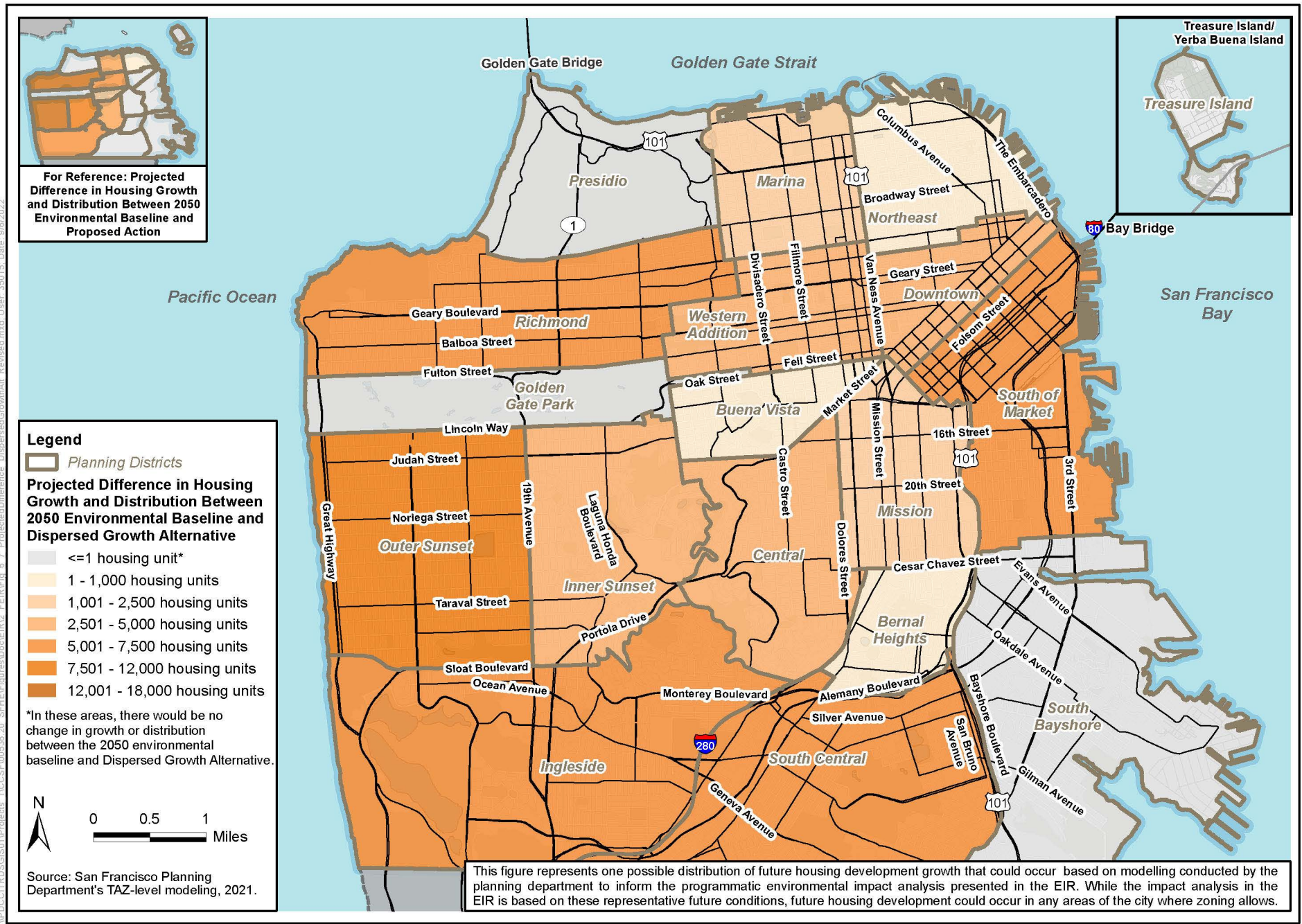
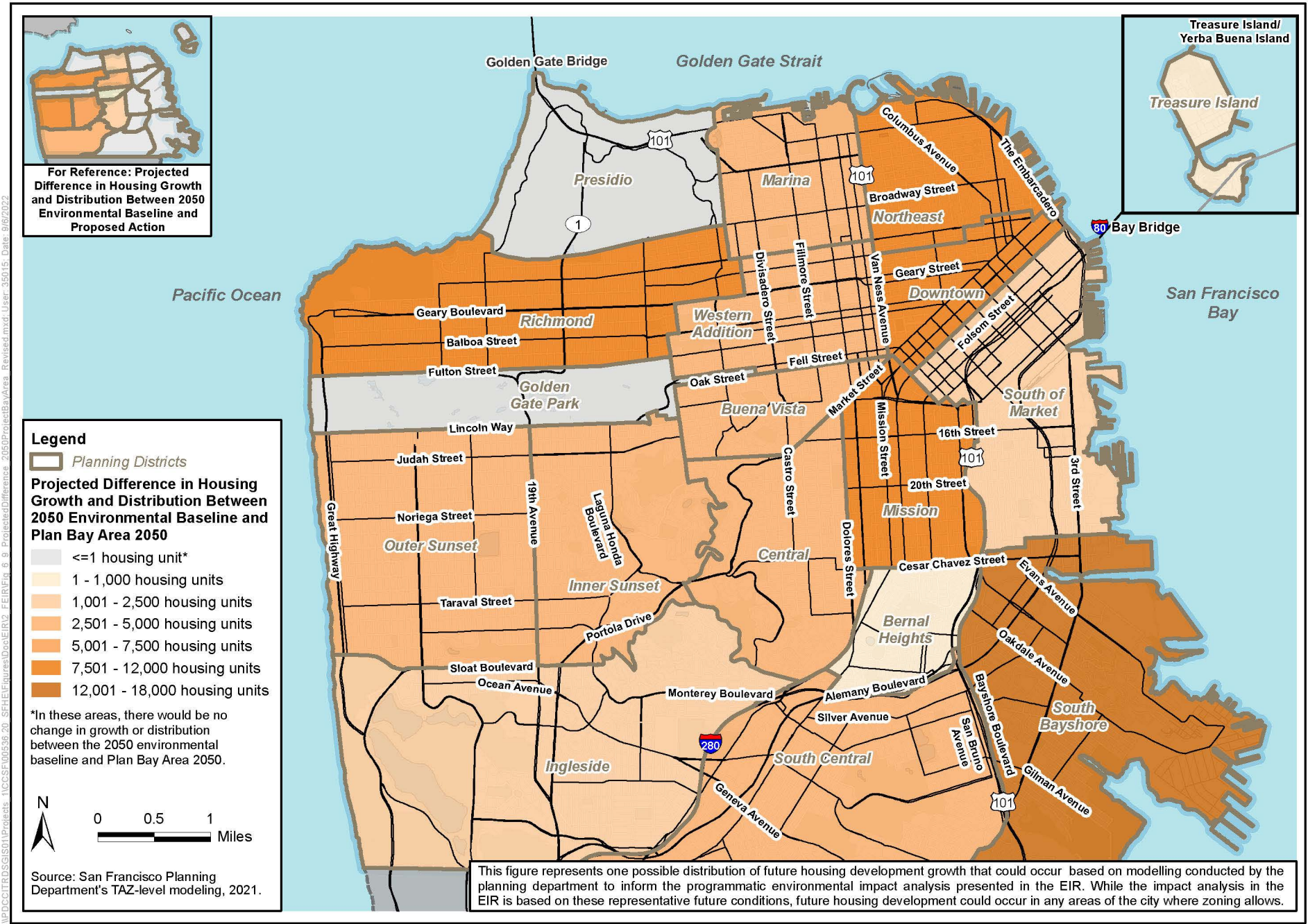


Figure 6-5
Projected Difference by Planning District in Housing Growth and Distribution
Between 2050 Environmental Baseline and Preservation Alternative [Revised]





Q. Staff-Initiated Revisions to Report Preparers Chapter (Draft EIR Chapter 7)

On draft EIR p. 7-1, the list under “A. EIR Authors” has been revised as follows:

Environmental Review Officer:	Lisa M. Gibson
Deputy Environmental Review Officer:	Devyani Jain
Senior Environmental Planner:	Elizabeth White
Senior Environmental Planner:	Alana Callagy
Senior Environmental Planner:	Ryan Shum
Principal Environmental Planner:	Chris Kern
<u>Principal Environmental Planner:</u>	<u>Debra Dwyer</u>
Principal Environmental Planner (Transportation):	Wade Wietgreffe

On draft EIR p. 7-2, the list under “B. EIR Consultants” has been revised as follows:

Project Director:	Heidi Mekkelson
Project Manager:	Jessica Viramontes
Deputy Project Manager:	Jennifer Andersen
Deputy Project Manager:	Claudia Watts
<u>Project Coordinator:</u>	<u>Shivani Raina</u>

R. Staff-Initiated Revisions to Draft EIR Appendices

Text changes have been made to EIR Appendix B, Housing Element Update Policies and Implementing Actions to reflect the fourth draft of the San Francisco Housing Element 2022 Update, October 2022. Some policies have been refined based on community engagement and feedback from the California Department of Housing and Community Development but the intent remains similar to the original. New policies that are relevant to the assessment of the proposed action’s physical effects on the environment, included as part of the fourth draft that were not in the third draft of housing element update policies (March 2022), are policies 26, 27, 29, 30, and 36. The revised EIR Appendix B is included in Attachment 4 of this RTC document.

Text changes have been made to Appendix C, Housing Element 2022 Update Modeling and Projections (specifically Appendix A of Appendix C) to clarify which percent of each planning district is located in a well-resourced area. Preservation Alternative Methodology, Appendix C to the Housing Element 2022 Update Modeling and Projections, has been updated to reflect the fourth draft of the San Francisco Housing Element 2022 Update, October 2022. The text changes to the EIR Appendix C are included in Attachment 6 of this RTC document.

Text changes to EIR Appendix F, Cultural Resources Supporting Information. Table F-1, Built-Environmental Resources Tables, has been updated to add the Mission Dolores Neighborhood Context Statement and Survey. This context statement and survey were completed after the draft EIR was published. Table F-5, Context Statements and Theme Studies Addressing Neighborhoods with Greatest Likelihood of Change under the Housing Element Update, has been updated to show that the Earthquakes Shacks Theme was completed in 2021. The text changes to the EIR Appendix F are included in Attachment 7 of this RTC document.

Text changes to EIR Appendix G.5, Transit Analysis Approach and Results, have been made to clarify that the “M Ocean View” Muni Metro line was included in the capacity analysis, rather than the “Ocean – M.” The text changes to the EIR Appendix G.5 are included in Attachment 8 of this RTC document.

Text changes to EIR Appendix I, Air Quality Supporting Information, have been made to specifically evaluate the cancer risk to workers and to update the PM_{2.5} concentration analysis to consider PM_{2.5} concentrations from construction dust and compliance with the city’s dust control ordinance. This updated analysis is presented in a new Appendix I.4. Additionally, Appendix I.3, Tables 13.2, and 15.2 were revised to reflect corrected modeling distances which reduced PM_{2.5} concentration values. The text revisions correct minor errors, clarify, expand, or update the information presented in the draft EIR. The text changes to the EIR Appendix I are included in Attachment 9 of this RTC document.

This Page Intentionally Left Blank

ATTACHMENT 1

Draft EIR Public Hearing Transcript

LIST OF COMMENTERS ON THE DRAFT EIR

The table below lists the commenters' names, along with the corresponding commenter codes used in RTC Chapter 4, Comments and Responses, for each set of comments; the comment format (e.g., email); and the comment date.

Commenters on the Draft EIR during the Public Review Period

Commenter Code	Name of Person and Title (if applicable)	Agency/ Organization (if applicable)	Comment Format ¹	Date ²
Federal, State, Regional, and Local Agencies, Boards, and Commissions				
A-Caltrans	Yunsheng Luo, Associate Transportation Planner	California Department of Transportation (Caltrans)	Email	May 16, 2022
A-Diamond	Sue Diamond, Commissioner	San Francisco Planning Commission	Transcript	June 9, 2022
A-Diamond_2	Sue Diamond, Commissioner	San Francisco Planning Commission	Email	July 11, 2022
A-HPC	Not Specified	San Francisco Historic Preservation Commission	Letter	June 7, 2022
A-Imperial	Theresa Imperial, Commissioner	San Francisco Planning Commission	Transcript	June 9, 2022
A-Moore	Kathrin Moore, Commissioner	San Francisco Planning Commission	Transcript	June 9, 2022
A-Tanner	Rachael Tanner, Commissioner	San Francisco Planning Commission	Transcript	June 9, 2022
Organizations				
O-CCLT	Bruce Wolfe	Cares Community Land Trust	Transcript	June 9, 2022
O-CHA	Lori Brooke	Cow Hollow Association	Email with PDF Attachment	July 12, 2022
O-EJA	Francisco Da Costa	Environmental Justice Advocacy	Transcript	June 9, 2022
O-GGVNA	Phile Faroudja	Golden Gate Valley Neighborhood Association	Email	June 30, 2022

Commenter Code	Name of Person and Title (if applicable)	Agency/ Organization (if applicable)	Comment Format¹	Date²
O-JPIA	Owen Hart, President	Jordan Park Improvement Association	Email with Word Attachment	July 11, 2022
O-JTF	Emily Murase	Japantown Task Force	Email	June 21, 2022
O-LHIA	Kathy Devincenzi	Laurel Heights Improvement Association	Email with PDF Attachment	July 12, 2022
O-RDR	Don Misumi	Richmond District Rising	Transcript	June 9, 2022
O-REP	Joseph Smooke	Race & Equity in All Planning Coalition	Transcript	June 9, 2022
O-REP_2	Jeantelle Laberinto	Race & Equity in All Planning Coalition	Transcript	June 9, 2022
O-REP_3	Joseph Smooke	Race & Equity in All Planning Coalition	Email	July 12, 2022
O-SOMCAN	Angelica Cabande	South of Market Community Action Network	Transcript	June 9, 2022
O-SPEAK	Eileen Boken	Sunset-Parkside Education and Action Committee	Email	July 11, 2022
O-YCD	Zach Weisenburger	Young Community Developers	Transcript	June 9, 2022
Individuals				
I-Adam	Adam	Individual	Transcript	June 9, 2022
I-Arora	Ann Arora	Individual	Email	July 7, 2022
I-Ayers	Charles Ayers	Individual	Email	June 8, 2022
I-Bargar	Cliff Bargar	Individual	Email	June 8, 2022
I-Bash	Ty Bash	Individual	Email	April 21, 2022
I-Besmer	Jeremy Besmer	Individual	Email	June 8, 2022
I-Boken	Eileen Boken	Individual	Transcript	June 9, 2022
I-Boudreau	Sarah Boudreau	Individual	Email	June 8, 2022
I-Bratun-Glen	Zachary Bratun-Glennon	Individual	Email	July 12, 2022
I-Britamon ³	Jonathan Britamon	Individual	Transcript	June 9, 2022
I-Bunemann ³	Jonathan Bunemann	Individual	Email	June 7, 2022

Commenter Code	Name of Person and Title (if applicable)	Agency/ Organization (if applicable)	Comment Format¹	Date²
I-Burns	Linda and Tom Burns	Individual	Email	July 10, 2022
I-Chen	Michael Chen	Individual	Email	June 8, 2022
I-Chintala	George Chintala	Individual	Email	July 12, 2022
I-Chong,L	Linda Chong	Individual	Email	July 11, 2022
I-Chong,RB	Richard and Beverly Chong	Individual	Email	July 10, 2022
I-Conner	Scot Conner	Individual	Email	June 8, 2022
I-Cuddeback	Sam Cuddeback	Individual	Email	June 16, 2022
I-Damerdji	Salim Damerdji	Individual	Email	June 8, 2022
I-Day	Andrew Day	Individual	Email	June 9, 2022
I-DiMento	Joseph DiMento	Individual	Email	June 8, 2022
I-Ed	Ed	Individual	Email	June 10, 2022
I-Eisler,J	Jessica Eisler	Individual	Email	July 8, 2022
I-Eisler,M	Michael Eisler	Individual	Email	July 8, 2022
I-Elmendorf	Christopher Elmendorf	Individual	Email with PDF attachment	May 10, 2022
I-Esfandiari	Bobak Esfandiari	Individual	Email	June 8, 2022
I-Federman	Dan Federman	Individual	Email	June 8, 2022
I-Frankel	Will Frankel	Individual	Email	June 8, 2022
I-Fruchtman	Robert Fruchtman	Individual	Email	June 8, 2022
I-Fruchtman_2	Bob Fruchtman	Individual	Transcript	June 9, 2022
I-Gauss	Miriam Gauss	Individual	Email	June 19, 2022
I-Glick	Linda Glick	Individual	Email	July 11, 2022
I-Golden,A	Alexandra Golden	Individual	Email	July 12, 2022
I-Golden,J	Jonathan Golden	Individual	Email	July 12, 2022
I-Greenfield	Jason Greenfield	Individual	Email	July 12, 2022
I-Hart	Owen Hart	Individual	Email	July 10, 2022
I-Hestor	Sue Hestor	Individual	Transcript	June 9, 2022
I-Hong	Dennis Hong	Individual	Email	June 9, 2022
I-Hong_2	Dennis Hong	Individual	Email	July 11, 2022
I-Howell	Linda and Larry Howell	Individual	Email	July 10, 2022
I-Ivan	David Ivan	Individual	Email	June 9, 2022

Commenter Code	Name of Person and Title (if applicable)	Agency/ Organization (if applicable)	Comment Format¹	Date²
I-Jacobi	Mary Jacobi	Individual	Email	July 11, 2022
I-Johnson	Corey Johnson	Individual	Email	June 8, 2022
I-Kanter	David Kanter	Individual	Email	June 8, 2022
I-Kaplan	Ira Kaplan	Individual	Email	June 8, 2022
I-Kattouw	Roan Kattouw	Individual	Email	June 8, 2022
I-Keller	Nathaniel Keller	Individual	Email	June 16, 2022
I-Kind	Elizabeth A. Kind	Individual	Email	July 11, 2022
I-Klenk	Matthew Klenk	Individual	Email	June 8, 2022
I-Kline	Laura Kline	Individual	Email	June 17, 2022
I-Kline_2	Laura Kline	Individual	Email	June 17, 2022
I-Lee	Laurance Lee	Individual	Email	June 8, 2022
I-Madsen	Elena Madsen	Individual	Email	July 8, 2022
I-Mahoney	David Mahoney	Individual	Email	June 18, 2022
I-Marks	Laurie Marks	Individual	Email	June 16, 2022
I-Marks_2	Laurie Marks	Individual	Email	July 8, 2022
I-Martin	Richard Martin	Individual	Email	July 7, 2022
I-Marzo	Steve Marzo	Individual	Email	June 8, 2022
I-Massenburg	Mary Ann Massenburg and Robert D. Purcell	Individual	Email	July 12, 2022
I-Mathews	Linda Mathews	Individual	Email	July 11, 2022
I-Miller	Laurie Miller	Individual	Email	July 12, 2022
I-Mogannam	Mary Mogannam	Individual	Email	July 11, 2022
I-Munoz	Martin Munoz	Individual	Email	June 8, 2022
I-Nakahara	Glynis Nakahara	Individual	Email	June 9, 2022
I-Nakahara_2	Glynis Nakahara	Individual	Transcript	June 9, 2022
I-O'Neill	Shannon and Shawn O'Neill	Individual	Email	July 10, 2022
I-Paul,J	Julie Paul	Individual	Email	June 21, 2022
I-Paul,J_2	Julie Paul	Individual	Email	July 5, 2022
I-Paul,J_3	Julie Paul	Individual	Email	July 9, 2022
I-Paul,M	Mike Paul	Individual	Email	July 5, 2022
I-Paul,M_2	Mike Paul	Individual	Email	July 10, 2022

Commenter Code	Name of Person and Title (if applicable)	Agency/ Organization (if applicable)	Comment Format¹	Date²
I-Perla	Jessica Perla	Individual	Email	June 8, 2022
I-Powell	Brandon Powell	Individual	Email	June 8, 2022
I-Pressman	Lauren Pressman Greenfield	Individual	Email	July 10, 2022
I-Randecker	Stacey Randecker	Individual	Email	June 9, 2022
I-Resnansky	Kristin Resnansky	Individual	Email	June 20, 2022
I-Robbins	Sallie Robbins	Individual	Email	July 2, 2022
I-Robbins_2	Sallie Robbins	Individual	Email	July 7, 2022
I-Roberson	Kelly Roberson	Individual	Email	May 7, 2022
I-Roberson_2	Kelly Roberson	Individual	Email	July 8, 2022
I-Roberson_3	Kelly Roberson	Individual	Email	July 11, 2022
I-Rogers	Sarah Rogers	Individual	Email	June 8, 2022
I-Rose	Jeremy Rose	Individual	Email	June 8, 2022
I-Russell	Kenneth Russell	Individual	Email	June 8, 2022
I-Schember	Christopher Schember	Individual	Email	June 22, 2022
I-Schuttish	Georgia Schuttish	Individual	Transcript	June 9, 2022
I-Schuttish_2	Georgia Schuttish	Individual	Email	July 11, 2022
I-Schuttish_3	Georgia Schuttish	Individual	Email	July 13, 2022*
I-Schwartz	Elliot Schwartz	Individual	Email	June 8, 2022
I-Simmons	Scott Simmons	Individual	Email	June 8, 2022
I-Storey	Meg Storey	Individual	Email	June 17, 2022
I-Subin	Zach Subin	Individual	Email	June 8, 2022
I-Thalheimer	Richard Thalheimer	Individual	Email	August 11, 2022*
I-Titus	Alan Titus	Individual	Email	July 11, 2022
I-Truong	Justin Truong	Individual	Email	June 28, 2022
I-Tyburski	Jonathan Tyburski	Individual	Email	June 9, 2022
I-Underwood	Victoria Underwood	Individual	Email with PDF attachment	July 7, 2022
I-Underwood_2	Victoria Underwood	Individual	Email	July 8, 2022
I-Vijayaraghavan	Srinivasan Vijayaraghavan	Individual	Email	June 8, 2022
I-Watson	David Watson	Individual	Email	June 8, 2022

Commenter Code	Name of Person and Title (if applicable)	Agency/ Organization (if applicable)	Comment Format¹	Date²
I-Webb	James Webb	Individual	Email	June 8, 2022
I-Weinberg	Barbara Weinberg	Individual	Email	July 10, 2022
I-Welborn	Tess Welborn	Individual	Transcript	June 9, 2022
I-Whitfield	Charles Whitfield	Individual	Email	June 8, 2022
I-Winkler	Calla Winkler	Individual	Email	July 10, 2020
I-Wuerfel	Nancy Wuerfel	Individual	Email	July 26, 2022 [*]
I-Yamagami	Dick & Jan Yamagami	Individual	Email	June 17, 2022
I-Yovanopoulos	Anastasia Yovanopoulos	Individual	Transcript	June 9, 2022

Notes:

¹ Transcript: comments made during draft EIR public hearing at the planning commission.

² Comments submitted after July 12, 2022, the closing date of the public comment period, are highlighted by an asterisk (*). Late comments are not required to be included in this RTC document, but the department has chosen to include them and they have been responded to as appropriate in RTC Chapter 4, Comments and Responses.

³ I-Britamon and I-Bunemann may be the same commenter.

SAN FRANCISCO
PLANNING COMMISSION

HYBRID HEARING
HELD ON THURSDAY, JUNE 9, 2022
1:00 PM

SAN FRANCISCO HOUSING ELEMENT
ITEM 11

COMMISSION CHAMBERS, ROOM 400
CITY HALL, 1 DR. CARLTON B. GOODLETT-PLACE
SAN FRANCISCO, CA 94102-4689

TRANSCRIBED BY: MIA CAMERA

JUNE 20, 2022

JAN BROWN & ASSOCIATES
WORLDWIDE DEPOSITION & VIDEOGRAPHY SERVICES
701 Battery St., 3rd Floor, San Francisco, CA 94111
(415) 981-3498 or (800) 522-7096

1
2 COMMISSIONERS IN ATTENDANCE:

3 RACHEL TANNER, PRESIDENT

4 KATHRIN MOORE, VICE PRESIDENT

5 JOEL KOPPEL

6 SUE DIAMOND

7 THERESA IMPERIAL

8 GABRIELLA RUIZ

9 FRANK FUNG

10 JONAS IONIN, SECRETARY

11 RICH HILLIS, PLANNING DIRECTOR

12
13 KRISTEN JENSEN, CITY ATTORNEY

14
15 PRESENTERS:

16 LISA GIBSON, ENVIRONMENTAL REVIEW OFFICER

17 LIZ WHITE, PLANNING DEPARTMENT STAFF

18
19 PUBLIC COMMENTERS:

20 GEORGIA SCHUTTISH

21 JONATHAN B.

22 EILEEN BOKEN

23 DON MISUMI

24 ANASTASIA YOVANOPOULOS

25 BOB FRUCHTMAN

ZACH WEISENBURGER

JOSEPH SMOOKE

JEANTELE LABERINTO

SUE HESTOR

FRANCISCO DA COSTA

ADAM

ANGELICA CABANDE

TESS WELBORN

GLYNIS NAKAHARA

BRUCE WOLFE

1 JUNE 9, 2022

2 3:32 PM

3 P R O C E E D I N G S

4 ---OOO---

5
6 JONAS IONIN: AND WE'LL PLACE THIS UNDER YOUR
7 SPECIAL CALENDAR FOR ITEM 11, CASE NO. 2019-016230-ENV
8 FOR THE HOUSING ELEMENT 2022 UPDATE ENVIRONMENTAL IMPACT
9 REPORT.

10 THIS IS THE DRAFT ENVIRONMENTAL IMPACT REPORT
11 HEARING. PLEASE NOTE THAT PUBLIC COMMENT FOR THIS DRAFT
12 EIR IS FROM APRIL 20TH, 2022 UNTIL 5:00 P.M., TUESDAY,
13 JUNE 21ST, 2022.

14 PRESIDENT TANNER: THANK YOU, MR. SECRETARY.
15 BEFORE WE GET FIRED UP, I'M GOING TO HAVE -- LET'S TAKE
16 A SHORT BREAK SO COMMISSIONERS CAN GET SOME
17 STRETCHING-OF-THEIR-LEGS TIME.

18 IF THERE ARE CALLERS WHO ARE ON THE LINE, I ASK
19 IF YOU CAN RAISE YOUR HANDS NOW SO WE CAN SEE HOW MANY
20 FOLKS ARE ANTICIPATED TO SPEAK. THERE'S NOT A LOT OF
21 PEOPLE IN THE CHAMBER, SO I'M NOT REALLY SURE WHAT OUR
22 PUBLIC COMMENT LOOKS LIKE.

23 SO IF YOU ARE ON THE LINE AND WANT TO SPEAK,
24 PLEASE RAISE YOUR HAND NOW, AND WE WILL ADJOURN FOR --
25 DO YOU GUYS WANT TEN MINUTES? FIVE MINUTES?

1 FIVE MINUTES, COMMISSIONER IMPERIAL SAYS.

2 FIVE-MINUTE BREAK. WE WILL BE BACK AT 3:40.

3 [RECESS TAKEN FOR SEVERAL MINUTES.]

4 [BACK ON THE RECORD 3:45.]

5 JONAS IONIN: GOOD AFTERNOON. AND WELCOME BACK
6 TO THE SAN FRANCISCO PLANNING COMMISSION HYBRID HEARING
7 FOR JUNE 9, 2022.

8 COMMISSIONERS, WE LEFT OFF UNDER YOUR SPECIAL
9 CALENDAR FOR ITEM 11, CASE NO. 2019-016230 ENV, FOR THE
10 HOUSING ELEMENT 2022 UPDATE ENVIRONMENTAL IMPACT REPORT.
11 THIS IS THE DRAFT EIR.

12 DIRECTOR RICH HILLIS: SO COMMISSIONERS, JUST
13 BEFORE WE JUMP INTO THE EIR, AND, AGAIN, THIS IS MORE
14 FOCUSED ON GETTING COMMENTS TO THE DRAFT EIR.

15 I JUST WANTED TO LET YOU KNOW WHERE WE ARE
16 BROADLY WITH THE HOUSING ELEMENT.

17 SO WE SUBMITTED THE DRAFT -- OUR DRAFT HOUSING
18 ELEMENT, OR THE MOST RECENT DRAFT HOUSING ELEMENT TO THE
19 STATE ON MAY 10TH. WE ARE MEETING WITH THEM NEXT WEEK
20 TO GET SOME INITIAL COMMENTS, SO WE'LL REPORT BACK TO
21 YOU ON THAT.

22 WE ARE EXPECTING OFFICIAL COMMENTS FROM THE
23 STATE ON OUR DRAFT IN MID-AUGUST, SO THAT'S WHEN WE'LL
24 ACTUALLY KIND OF HAVE THEIR OFFICIAL COMMENTS TO PROVIDE
25 YOU WITH.

1 WE CONTINUE TO REFINE OUR ANALYSIS ON HOUSING
2 CAPACITY AND CONSTRAINTS, AND THE STATE HAS EXPRESSED
3 PARTICULARLY AN INTEREST IN THAT, BUT YOU SAW THAT AT
4 THE LAST ITERATION OF THE HOUSING ELEMENT, BUT WE'RE
5 UPDATING IT, THAT IS AS WE GO ALONG.

6 WE ARE BRIEFING BOARD MEMBERS ON WHERE WE ARE
7 WITH THE DRAFT, AND WE ARE IN THE MIDST OF PREPARING THE
8 RACIAL AND SOCIAL EQUITY ANALYSIS, WHICH I TALKED ABOUT
9 EARLIER.

10 SO JUST SOME HIGHLIGHTS ON WHERE WE ARE IN THE
11 PROCESS. THANKS.

12 PRESIDENT TANNER: THANK YOU.

13 LISA GIBSON: COMMISSIONERS, I AM LISA GIBSON,
14 ENVIRONMENTAL REVIEW OFFICER, AND I'D LIKE TO BRIEFLY
15 INTRODUCE THIS ITEM WHICH IS THE DRAFT ENVIRONMENTAL
16 IMPACT REPORT OR DRAFT EIR FOR THE HOUSING ELEMENT 2022
17 UPDATE.

18 TODAY WE'RE HERE TO RECEIVE COMMENTS FROM
19 COMMISSIONERS AND THE PUBLIC ON THE DRAFT EIR. THE
20 PLANNING DEPARTMENT PUBLISHED THE DRAFT EIR ON
21 APRIL 20TH, 2022.

22 THE PURPOSE OF THE DOCUMENT IS TO INFORM
23 DECISION MAKERS AND THE PUBLIC ABOUT THE POTENTIAL
24 ENVIRONMENTAL IMPACTS OF THE PROPOSED HOUSING ELEMENT
25 2022 UPDATE AND TO IDENTIFY MITIGATION MEASURES AND

1 ALTERNATIVES THAT WOULD PREVENT OR LESSEN SIGNIFICANT
2 ENVIRONMENTAL DAMAGE.

3 THE DOCUMENT IS THE CULMINATION OF TWO YEARS OF
4 ANALYSIS CONDUCTED BY AN OUTSTANDING TEAM OF PLANNING
5 DEPARTMENT STAFF AND ENVIRONMENTAL CONSULTANTS WITH THE
6 GENEROUS ASSISTANCE OF OTHER SAN FRANCISCO DEPARTMENTS
7 AND AGENCIES.

8 IF WE COULD SHOW THE SLIDE SHOW, WE HAVE A SLIDE
9 THAT SHOWS THE MAJOR CONTRIBUTORS OF THIS EFFORT.

10 DIRECTOR HILLIS: IT'S UP.

11 LISA GIBSON: READY?

12 JONAS IONIN: WELL, IF WE ARE GOING TO PAUSE
13 RIGHT HERE, I APOLOGIZE.

14 I WAS REMISS IN AFFORDING COMMISSIONER RUIZ THE
15 OPPORTUNITY TO BE RECUSED.

16 COMMISSIONER RUIZ?

17 COMMISSIONER RUIZ: HI, SORRY. I WASN'T SURE
18 WHEN TO INSERT MYSELF.

19 I WOULD JUST LIKE TO SAY BECAUSE OF MY WORK WITH
20 THE HOUSING ELEMENT PRIOR TO ME BEING ON THE COMMISSION,
21 I WILL HAVE TO RECUSE MYSELF FOR THIS ITEM.

22 PRESIDENT TANNER: THANK YOU, COMMISSIONER RUIZ.

23 LISA GIBSON: ALL RIGHT. SHALL I CONTINUE?

24 JONAS IONIN: YES.

25 COMMISSIONER MOORE: DON'T -- DON'T WE NEED A

1 MOTION TO RECUSE HER?

2 COMMISSIONER FUNG: WE NEED A MOVE ON THAT, YEAH.

3 JONAS IONIN: WELL, WE CAN MAKE IT OFFICIAL WITH
4 A MOTION, BUT MY UNDERSTANDING BECAUSE OF THE DECISION
5 AND THE ADVICE OF THE CITY ATTORNEY, WE DON'T
6 NECESSARILY NEED ONE BECAUSE --

7 COMMISSIONER MOORE: OKAY.

8 JONIS IONIN: -- I DON'T THINK THE COMMISSION
9 HAS THE OPTION TO REINSTATE HER IN THIS PARTICULAR CASE.

10 PRESIDENT TANNER: CITY ATTORNEY, DO YOU WANT TO
11 CONFIRM? IS THAT ACCURATE?

12 KRISTEN JENSEN, CITY ATTORNEY: THAT IS CORRECT.
13 AND ALSO SHE RECUSED HERSELF FROM AN EARLIER RELATED
14 ITEM, AND I BELIEVE AT THAT TIME STATED THAT SHE WOULD
15 BE RECUSING HERSELF FROM ALL HOUSING ELEMENT-RELATED
16 ITEMS BEFORE THE COMMISSION.

17 PRESIDENT TANNER: THANK YOU. SO A MOTION IS
18 NOT NECESSARY.

19 JONAS IONIN: RIGHT.

20 PRESIDENT TANNER: THANK YOU FOR THAT.

21 LISA GIBSON: SO THE SLIDE THAT WE ARE SHOWING
22 NOW ACKNOWLEDGES THE TEAM OF OUTSTANDING FOLKS THAT HAVE
23 CONTRIBUTED TO THIS EFFORT.

24 IN THE CHAMBERS WITH US TODAY ARE CORE MEMBERS
25 OF THE EIR TEAM INCLUDING LIZ WHITE, ALANA CALLAGY, AND

1 CHRIS KERN AND RYAN SHUM UNFORTUNATELY IS OUT SICK.

2 SO WITH THAT, I AM GOING TO TURN THINGS OVER TO
3 LIZ, SENIOR PLANNER WITH THE PLANNING DEPARTMENT.

4 LIZ WHITE: THANKS, LISA.

5 GOOD AFTERNOON, PRESIDENT TANNER AND PLANNING
6 COMMISSIONERS. MY NAME IS LIZ WHITE, PLANNING
7 DEPARTMENT STAFF.

8 PLANNING'S COMMUNITY EQUITY DIVISION HAS
9 BROUGHT THE HOUSING ELEMENT 2022 UPDATE TO THIS
10 COMMISSION MULTIPLE TIMES, SO THIS NEXT SLIDE WILL BE A
11 QUICK RECAP.

12 THE HOUSING ELEMENT WOULD ESTABLISH GOALS,
13 POLICIES, AND ACTIONS TO ADDRESS EXISTING AND FUTURE
14 HOUSING NEEDS, INCLUDING REGIONAL HOUSING TARGETS FOR
15 SAN FRANCISCO.

16 THE HOUSING ELEMENT WOULD ADOPT POLICIES,
17 DESIGNED TO IMPROVE HOUSING AFFORDABILITY AND ADVANCE
18 RACE AND SOCIAL EQUITY.

19 THE HOUSING ELEMENT WOULD ACCOMMODATE 150,000
20 NEW HOUSING UNITS BY 2050 OR APPROXIMATELY 5000 UNITS
21 PER YEAR FOR 30 YEARS.

22 THE HOUSING ELEMENT DOES NOT INCLUDE SPECIFIC
23 PLANNING CODE AMENDMENTS, ZONING CHANGES, DEVELOPMENT
24 PROJECTS, OR OTHER IMPLEMENTING MEASURES.

25 OKAY. NOW, I WILL BEGIN DISCUSSING THE HOUSING

1 ELEMENT 2022 UPDATE'S ENVIRONMENTAL REVIEW.

2 THE HOUSING ELEMENT EIR EVALUATES THE REASONABLY
3 FORESEEABLE PHYSICAL AND ENVIRONMENTAL EFFECTS ON THE
4 ENVIRONMENT THAT COULD OCCUR FROM ADOPTION AND
5 IMPLEMENTATION OF THE HOUSING ELEMENT 2022 UPDATE, OR THE
6 PROPOSED ACTION.

7 THE EIR ANALYSIS IS CONDUCTED AT A PROGRAMMATIC
8 LEVEL BECAUSE THE PRECISE LOCATION, DESIGN, AND TIMING
9 OF THE INDIVIDUAL DEVELOPMENT PROJECTS THAT WILL
10 IMPLEMENT THE PROPOSED ACTION ARE UNKNOWN.

11 THE EIR EVALUATES THE IMPACTS OF IMPLEMENTATION
12 OF THE PROPOSED ACTION IN 2050, COMPARED TO THE IMPACTS
13 OF A CONTINUATION OF EXISTING HOUSING ELEMENT POLICIES.
14 THIS CONTINUATION IS CALLED THE 2050 ENVIRONMENTAL
15 BASELINE, AND THESE EXISTING POLICIES ARE GUIDED BY THE
16 ADOPTED 2014 HOUSING ELEMENT.

17 AS DISCUSSED IN THE EIR'S CHAPTER 4, COMPARING
18 AND ASSESSING IMPACTS OF THE HOUSING ELEMENT UPDATE WITH
19 EXISTING CONDITIONS, AS OPPOSED TO THE 2050
20 ENVIRONMENTAL BASELINE, COULD MISLEAD THE PUBLIC AND
21 DECISION MAKERS THAT THERE WOULD BE NO OR FEW CHANGES TO
22 EXISTING CONDITIONS FROM CONTINUED DEVELOPMENT UNDER THE
23 EXISTING 2014 HOUSING ELEMENT AND THAT ALL IMPACTS FROM
24 FUTURE 2050 DEVELOPMENT ARE THE RESULT OF THE HOUSING
25 ELEMENT UPDATE, RATHER THAN PARTIALLY BEING ATTRIBUTABLE

1 TO THE DEVELOPMENT THAT COULD OCCUR UNDER THE EXISTING
2 2014 HOUSING ELEMENT.

3 THESE CONCLUSIONS WOULD BE INCORRECT AND WOULD
4 SUBSTANTIALLY OVERESTIMATE THE IMPACTS CAUSED BY THE
5 HOUSING ELEMENT UPDATE.

6 THE EIR ALSO EVALUATES A RANGE OF ALTERNATIVES.

7 THIS DIAGRAM, FIGURE 2-12 FROM THE DRAFT EIR,
8 SHOWS THE RELATIONSHIP BETWEEN THE 2050 ENVIRONMENTAL
9 BASELINE AND THE HOUSING ELEMENT 2022 UPDATE.

10 UNDER THE 2050 ENVIRONMENTAL BASELINE,
11 APPROXIMATELY 102,000 NEW UNITS ARE PROJECTED IN
12 SAN FRANCISCO BY 2050, WHEREAS 150,000 NEW UNITS ARE
13 PROJECTED UNDER THE HOUSING ELEMENT 2022 UPDATE
14 BY 2050.

15 WHILE THE HOUSING ELEMENT 2022 UPDATE WOULD
16 RESULT IN APPROXIMATELY 50,000 MORE HOUSING UNITS WHEN
17 COMPARED TO THE 2050 ENVIRONMENTAL BASELINE, A
18 COMMONALITY BETWEEN THESE TWO VISIONS OF HOUSING GROWTH
19 FOR SAN FRANCISCO IS THE PLANNING DEPARTMENT'S PIPELINE
20 PROJECTS.

21 AS PREVIOUSLY PRESENTED AND PUBLISHED BY THE
22 COMMUNITY EQUITY TEAM, THE PROPOSED DRAFT POLICIES OF
23 THE HOUSING ELEMENT 2022 UPDATE SEEK TO CHANGE THE
24 GEOGRAPHIC DISTRIBUTION OF WHERE HOUSING GROWTH WILL
25 OTHERWISE OCCUR IN THE CITY UNDER EXISTING POLICIES.

1 THE HOUSING ELEMENT ENDEAVORS TO SHIFT AN
2 INCREASED SHARE OF THE CITY'S FUTURE HOUSING GROWTH TO
3 TRANSIT CORRIDORS AND LOW-DENSITY RESIDENTIAL DISTRICTS
4 WITHIN WELL-RESOURCED AREAS, WHICH ARE PRIMARILY IN THE
5 WESTERN AND NORTHERN PARTS OF SAN FRANCISCO.

6 AS SHOWN HERE IN THE DRAFT EIR'S FIGURE 2-7, THE
7 PROPOSED ACTION PROMOTES SMALL AND MID-RISE MULTI-FAMILY
8 DEVELOPMENT THROUGH POSSIBLE HEIGHT INCREASES ALONG
9 TRANSIT CORRIDORS AND THROUGH MODIFYING DENSITY LIMITS
10 IN LOW-DENSITY AREAS, SHOWN HERE IN YELLOW.

11 THIS MAP, FIGURE 2-6 FROM THE DRAFT EIR, SHOWS
12 THE PROJECTED GROWTH IN HOUSING UNITS BETWEEN 2020 AND
13 2050 UNDER THE EXISTING HOUSING ELEMENT, OR THE 2050
14 ENVIRONMENTAL BASELINE.

15 UNDER THE 2050 ENVIRONMENTAL BASELINE, THE
16 MAJORITY OF UNITS ARE PROJECTED IN THE EASTERN HALF OF
17 THE CITY, SHOWN AS THE DARKER YELLOW.

18 MANY OF THESE UNITS ARE PART OF PIPELINE
19 PROJECTS OR HOUSING PROJECTS THAT ARE UNDER
20 CONSTRUCTION, HAVE BEEN APPROVED OR ARE IN PROGRESS
21 BUILDING PERMITS, ARE ENTITLED, OR ARE CURRENTLY
22 UNDERGOING REVIEW AT THE PLANNING DEPARTMENT.

23 EXAMPLES OF LARGER PIPELINE PROJECTS ARE POTRERO
24 POWER STATION, MISSION ROCK, AND BALBOA RESERVOIR.

25 THIS MAP, FIGURE 2-10, IN THE DRAFT EIR SHOWS

1 THE PROJECTED GROWTH IN HOUSING UNITS BETWEEN 2020 AND
2 2050 UNDER THE HOUSING ELEMENT 2022 UPDATE.

3 THE HOUSING ELEMENT 2022 UPDATE WILL RESULT IN
4 APPROXIMATELY 50,000 MORE HOUSING UNITS IN SAN FRANCISCO
5 BY 2050 THAN UNDER THE 2050 ENVIRONMENTAL BASELINE.

6 YOU'LL SEE THERE CONTINUES TO BE GROWTH IN THE
7 EASTERN PART OF SAN FRANCISCO BUT THAT MORE GROWTH IS
8 PROJECTED IN THE NORTHERN AND WESTERN PARTS OF THE CITY.

9 THIS SLIDE IS PRESENTED FOR INFORMATIONAL
10 PURPOSES TO HELP CONTEXTUALIZE THE CHANGES BY 2050, BUT
11 AS PREVIOUSLY STATED, TO AVOID MISLEADING THE PUBLIC OR
12 DECISION MAKERS ABOUT THE EFFECTS OF THE PROJECT, THE
13 EIR EVALUATES IMPACTS OF THE PROPOSED ACTION COMPARED TO
14 THE 2050 ENVIRONMENTAL BASELINE.

15 THIS MAP, FIGURE 2-11 IN THE DRAFT EIR, SHOWS
16 THE PROJECTED CHANGE IN HOUSING UNIT LOCATION BY 2050
17 UNDER THE PROPOSED ACTION AS COMPARED TO THE 2050
18 ENVIRONMENTAL BASELINE.

19 IN GENERAL, AS SHOWN HERE IN ORANGE, FUTURE
20 ACTIONS CONSISTENT WITH THE PROPOSED HOUSING ELEMENT
21 UPDATE WOULD SHIFT AN INCREASED SHARE OF THE CITY'S
22 FUTURE HOUSING GROWTH TO TRANSIT CORRIDORS AND
23 LOW-DENSITY RESIDENTIAL DISTRICTS WITHIN WELL-RESOURCED
24 AREAS.

25 NOW LET'S DISCUSS THE PROPOSED ACTION'S

1 SIGNIFICANT IMPACTS.

2 PROJECTS IMPLEMENTING THE HOUSING ELEMENT 2022
3 UPDATE WOULD HAVE SIGNIFICANT AND UNAVOIDABLE IMPACTS
4 RELATED TO: UTILITIES AND SERVICE SYSTEMS, WIND, NOISE,
5 TRANSPORTATION, CULTURAL RESOURCES (BUILT ENVIRONMENT),
6 AIR QUALITY, AND SHADOW.

7 THE HOUSING ELEMENT 2022 UPDATE WOULD ALSO HAVE
8 SIGNIFICANT IMPACTS TO ARCHEOLOGICAL, TRIBAL, AND
9 PALEONTOLOGICAL RESOURCES, BUT THESE IMPACTS WOULD BE
10 REDUCED TO LESS-THAN-SIGNIFICANT LEVELS WITH MITIGATION.

11 THE EIR IDENTIFIES FEASIBLE MITIGATION TO AVOID
12 OR REDUCE SIGNIFICANT IMPACTS FOR MANY OF THOSE TOPIC
13 AREAS; HOWEVER, EVEN WITH MITIGATION, THE IMPACTS SHOWN
14 ON THIS SLIDE WOULD REMAIN SIGNIFICANT AND UNAVOIDABLE.

15 THE EIR IDENTIFIES APPROXIMATELY 31 MITIGATION
16 MEASURES, TOO MANY TO LIST HERE, BUT WE WILL GIVE A FEW
17 EXAMPLES: FUTURE ACTIONS CONSISTENT WITH THE PROPOSED
18 ACTION, SUCH AS NEW BUILDINGS THAT COULD POTENTIALLY
19 RESULT IN SIGNIFICANT WIND IMPACTS MUST BE SHAPED TO
20 MINIMIZE GROUND-LEVEL WIND SPEEDS AND INCLUDE BUILDING
21 FEATURES AND LANDSCAPING TO FURTHER REDUCE WIND IMPACTS.

22 HOWEVER, THE MASSING AND DESIGN OF FUTURE
23 DEVELOPMENT IS CURRENTLY UNKNOWN, AND THERE ARE
24 UNCERTAINTIES REGARDING INDIVIDUAL DEVELOPMENT PROJECTS,
25 RECEIVING APPROVALS FOR WIND BAFFLING MEASURES OFF-SITE

1 OR IN PUBLIC RIGHTS OF WAY. THEREFORE, THE IMPACT
2 REMAINS SIGNIFICANT AND UNAVOIDABLE WITH MITIGATION.

3 ANOTHER EXAMPLE IS NOISE. NOISE CONSTRUCTION
4 MITIGATION IN THE DRAFT EIR WOULD SUBSTANTIALLY REDUCE
5 THE INTENSITY AND DURATION OF CONSTRUCTION NOISE. THE
6 DRAFT EIR FOUND THAT WITH IMPLEMENTATION OF MITIGATION,
7 CONSTRUCTION NOISE IMPACTS FROM ACTIONS CONSISTENT WITH
8 THE HOUSING ELEMENT 2022 UPDATE WOULD LIKELY BE REDUCED
9 TO LESS-THAN-SIGNIFICANT LEVELS.

10 HOWEVER, DUE TO THE NATURE OF THE PROPOSED
11 ACTION -- SORRY.

12 DUE TO THE NATURE OF THE PROPOSED ACTION, THERE
13 COULD BE SIMULTANEOUS AND ONGOING CONSTRUCTION THAT
14 COULD RESULT IN THE NOISE LEVELS IN EXCESS OF STANDARDS
15 AND THIS WOULD BE SIGNIFICANT AND UNAVOIDABLE WITH
16 MITIGATION.

17 OTHER MITIGATION EXAMPLES INCLUDE CLEAN
18 CONSTRUCTION EQUIPMENT TO REDUCE AIR QUALITY IMPACTS AND
19 IMPLEMENTATION OF TRAVEL TIME MEASURES TO REDUCE
20 TRANSIT DELAY.

21 FOR SOME TOPIC AREAS, THERE IS NO FEASIBLE
22 MITIGATION IDENTIFIED, AND THEREFORE, THE IMPACTS SHOWN
23 HERE WOULD REMAIN SIGNIFICANT AND UNAVOIDABLE.

24 NEXT, LET'S REVIEW THE ALTERNATIVES EVALUATED.

25 CEQA REQUIRES AN EIR TO CONSIDER ALTERNATIVES

1 THAT WOULD AVOID OR REDUCE THE SIGNIFICANT IMPACTS OF
2 THE PROJECT.

3 THE EIR ANALYZES THE FOLLOWING ALTERNATIVES TO
4 THE HOUSING ELEMENT 2022 UPDATE: "THE NO PROJECT
5 ALTERNATIVE," WHICH ASSUMES THAT GROWTH WOULD CONTINUE
6 THROUGH 2050 UNDER EXISTING HOUSING ELEMENT POLICIES.

7 "THE EASTSIDE ALTERNATIVE," WHICH INCREASES
8 DEVELOPMENT ON THE EAST SIDE AND MAINTAINS LOWER DENSITY
9 ON THE WEST SIDE.

10 "THE PRESERVATION ALTERNATIVE," WHICH IS SIMILAR
11 TO THE HOUSING ELEMENT 2022 UPDATE BUT FOCUSES ON
12 REDUCING IMPACTS TO BUILT-ENVIRONMENT HISTORIC RESOURCES
13 BY REVISING POLICY LANGUAGE TO PRESERVE HISTORIC
14 RESOURCES AND REDUCE INCOMPATIBILITY WITH HISTORIC
15 DISTRICTS.

16 "THE DISPERSED GROWTH ALTERNATIVE," WHICH WOULD
17 REMOVE DENSITY CONTROLS IN MOST RH-1 OR RH-2 ZONING
18 CONTROL AREAS BUT WOULD NOT CHANGE EXISTING ZONING
19 HEIGHTS.

20 IN ADDITION, THE EIR INCLUDES ANALYSIS OF PLAN
21 BAY AREA 2050 WHICH WAS ADOPTED IN OCTOBER OF 2021 AND
22 IS THE LONG-RANGE INTEGRATED TRANSPORTATION AND
23 LAND-USE HOUSING STRATEGY FOR THE SAN FRANCISCO BAY
24 AREA.

25 PLAN BAY AREA PROJECTS APPROXIMATELY 188,000

1 HOUSING UNITS BY 2050 IN SAN FRANCISCO; THIS GROWTH
2 WOULD BE CONCENTRATED IN THE NORTHEAST, MISSION,
3 DOWNTOWN, SOUTH BAYSHORE, AND RICHMOND PLANNING
4 DISTRICTS.

5 ADDITIONALLY, AS RELATED TO THE ALTERNATIVES
6 DISCUSSION, THE HOUSING ELEMENT EIR TEAM ISSUED AN
7 ERRATA ON MAY 19, 2022, TO CORRECT TEXT ASSOCIATED WITH
8 INSET MAPS ON THE SEVERAL OF THE ALTERNATIVES FIGURES IN
9 CHAPTER 6. THIS ERRATA IS AVAILABLE ON PLANNING'S
10 WEBSITE, AND THE TEXT ON THE FIGURES WILL BE CORRECTED
11 AS A STAFF-INITIATED TEXT CHANGE IN THE RESPONSES TO
12 COMMENTS DOCUMENT.

13 COPIES OF THE ERRATA WERE DISTRIBUTED TO YOU,
14 AND WE HAVE COPIES AVAILABLE ON THE TABLE TO THE LEFT
15 FOR MEMBERS OF THE PUBLIC.

16 FINALLY, LET'S GO OVER THE SCHEDULE AND HOW TO
17 COMMENT ON THE DRAFT EIR. THIS TIMELINE SHOWS THE
18 HOUSING ELEMENT EIR'S MAJOR MILESTONES OVER THE LAST
19 YEAR AND THE TRAJECTORY INTO 2023.

20 THE CLOSE OF THE 60-DAY DRAFT EIR COMMENT PERIOD
21 WAS ORIGINALLY NOTICED AS JUNE 20TH; HOWEVER, JUNE 20TH
22 IS THE JUNETEENTH HOLIDAY. THEREFORE, THE COMMENT
23 PERIOD WILL CLOSE ON THE FOLLOWING BUSINESS DAY,
24 JUNE 21ST AT 5:00 P.M.

25 THE NEXT MAJOR MILESTONE WILL BE PUBLICATION OF

1 THE RESPONSES TO COMMENTS DOCUMENT IN EARLY JANUARY 2023,
2 AND THEN WE WILL RETURN TO THIS COMMISSION FOR THE EIR'S
3 CERTIFICATION HEARING AT THE END OF JANUARY 2023.

4 COMMENTS ON THE DRAFT EIR CAN BE SUBMITTED
5 EITHER IN WRITING OR VERBALLY AT TODAY'S HEARING.

6 TO SUBMIT A WRITTEN COMMENT ON THE DRAFT EIR,
7 YOU MAY WRITE TO:

8 ELIZABETH WHITE, SAN FRANCISCO PLANNING
9 DEPARTMENT, 49 SOUTH VAN NESS, SUITE 1400,
10 SAN FRANCISCO, CALIFORNIA, 94103.

11 OR YOU MAY SUBMIT YOUR COMMENTS TO:

12 CPC.HOUSINGELEMENTUPDATEEIR@SFGOV.ORG.

13 SUBSTANTIVE COMMENTS IS RECEIVED TODAY AT THIS
14 PLANNING COMMISSION HEARING AND COMMENTS RECEIVED IN
15 WRITING OR VIA E-MAIL BY JUNE 21ST WILL BE RESPONDED TO
16 IN A RESPONSES TO COMMENTS DOCUMENT. COMMENTS SHOULD BE
17 DIRECTED TOWARD THE EIR RATHER THAN THE MERITS OF THE
18 HOUSING ELEMENT UPDATE.

19 I WOULD LIKE TO NOTE THAT THE HISTORIC
20 PRESERVATION COMMISSION HELD A HEARING LAST WEEK ON
21 JUNE 1ST TO CONSIDER THEIR COMMENTS ON THE DRAFT EIR.

22 ON JUNE 7TH, THE HPC PROVIDED A LETTER
23 SUMMARIZING THEIR COMMENTS. THIS LETTER WAS FORWARDED
24 ELECTRONICALLY TO THIS COMMISSION, AND WE HAVE
25 DISTRIBUTED HARDCOPIES TODAY.

1 THEIR COMMENTS GENERALLY STATED THAT THEY FOUND
2 THE ANALYSIS OF HISTORIC RESOURCES IN THE EIR TO BE
3 ADEQUATE AND ACCURATE AND THAT THE PRESERVATION
4 ALTERNATIVE IS ADEQUATE.

5 THE HOUSING ELEMENT EIR TEAM THANKS YOU FOR YOUR
6 TIME. WE ARE AVAILABLE FOR ANY QUESTIONS YOU MAY HAVE
7 ABOUT THE ENVIRONMENTAL REVIEW PROCESS.

8 WE DO HAVE A COURT REPORTER HERE TODAY TO RECORD
9 YOUR COMMENTS. FOR MEMBERS OF THE PUBLIC WHO WISH TO
10 SPEAK, PLEASE STATE YOUR NAME FOR THE RECORD.

11 QUESTIONS AND COMMENTS ON THE ADEQUACY,
12 ACCURACY, AND COMPLETENESS OF THE EIR WILL BE ADDRESSED
13 IN THE RESPONSES TO COMMENTS DOCUMENT. THANK YOU.

14 JONAS IONIN: THANK YOU. IF THAT CONCLUDES
15 STAFF'S REPORT.

16 WE SHOULD OPEN UP PUBLIC COMMENT AS LONG AS
17 THERE AREN'T ANY QUESTIONS FROM -- IMMEDIATE QUESTIONS.

18 SO, THROUGH THE CHAIR, EACH MEMBER OF THE PUBLIC
19 WILL BE AFFORDED TWO MINUTES --

20 PRESIDENT TANNER: EXCUSE ME, JONAS. I JUST
21 WANT TO MAKE SURE, I DO SEE TWO COMMISSIONERS IN THE
22 SPEAKING QUEUE.

23 COMMISSIONERS KOPPEL, MOORE, WAS THAT FOR
24 SOMETHING PREVIOUS? OR DID YOU NEED TO SHARE SOMETHING
25 NOW?

1 KATHRIN MOORE: [NO RESPONSE.]

2 PRESIDENT TANNER: I DON'T HEAR ANYTHING FROM
3 THEM. SO, WE'LL ASSUME THAT THEY'RE ALL RIGHT.

4 LET'S GO AHEAD WITH PUBLIC COMMENT.

5 JONAS IONIN: VERY GOOD.

6 GEORGIA SCHUTTISH (IN PERSON): OKAY. HI.
7 GOOD EVENING. GEORGIA SCHUTTISH.

8 I SENT SOME WRITTEN COMMENTS ON PAGE S.6, THE
9 PRESERVATION ALTERNATIVE IS DESCRIBED AS THE
10 ENVIRONMENTALLY SUPERIOR ALTERNATIVE. THAT'S FINE.

11 I'D LIKE TO UNDERSTAND HOW THIS WOULD WORK WITH
12 THE -- WITH WHAT'S ON THE HOUSING ELEMENT, THE DRAFT,
13 THE THIRD DRAFT, ON PAGE 163 OF THE PACKET ABOUT POLICY
14 IN ACTION NO. 2060, WHICH WOULD BASICALLY GET RID OF
15 CONDITIONAL USE FOR DEMOLITION.

16 THE 2014 ELEMENT WHICH IS SORT OF HANGING AROUND
17 AS THE NO -- THE NO -- THE NO CHANGE ONE -- ALTERNATIVE.
18 THERE ARE A LOT OF THINGS IN THERE THAT I DON'T THINK
19 WERE EVER FULLY IMPLEMENTED, CERTAIN POLICIES LIKE
20 POLICY 2.2, "DISCOURAGE THE DEMOLITION OF A SOUND
21 EXISTING HOUSING UNLESS THE DEMOLITION RESULTS IN THE
22 NET INCREASE IN AFFORDABLE HOUSING."

23 I MEAN, THAT'S SOMETHING WE HAVE SEEN FOR
24 10 YEARS, AND THAT RELATES TO WHAT'S ON PAGE 4.2-19 TO
25 27, THE RESIDENTIAL DEVELOPMENT HISTORY. IT SAYS THE

1 "70'S DOWNZONING WAS DUE TO WORRIED AFFLUENT RESIDENTS."

2 WELL, MANY OF THOSE NEIGHBORHOODS WEREN'T
3 AFFLUENT RESIDENTS THEN AND THEY STILL AREN'T TODAY, AND
4 THERE'S NO MENTION OF ALL THE CHANGES THAT HAVE HAPPENED
5 IN THE LAST 10 YEARS, 20 YEARS, EARLY 21ST CENTURY AS
6 YOU KNOW. DE FACTO DEMOLITIONS AND MERGERS, INCOME
7 INEQUALITY, DISPLACEMENT, EVICTIONS, MONSTER HOMES, ETC.

8 SEVENTY-TWO PERCENT CHANCE OF AN EARTHQUAKE IS
9 MENTIONED IN HERE. WHAT ARE THE REBUILDING PLANS IF
10 THERE'S SOMETHING TRULY CATASTROPHIC IN THESE NEXT
11 30 YEARS? HOW WILL OWNERSHIP AND OCCUPANCY RECORDS BE
12 MAINTAINED TO FACILITATE REBUILDING?

13 AND THE SEISMIC SLOPE AND HAZARD ZONE? THAT WAS
14 CHANGED FROM 20 PERCENT TO 25 PERCENT? THAT IS ON
15 PAGE 4.1-162. I THINK THE 20 PERCENT IS MORE PRUDENT.

16 THAT'S IT. HAVE A GREAT EVENING, TAKE CARE.

17 JONAS IONIN: ALL RIGHT. WE ARE GOING TO GO TO
18 OUR REMOTE CALLERS. YOU NEED TO PRESS *3 TO BE ADDED TO
19 THE QUEUE, AND WHEN YOU HEAR THAT YOUR LINE HAS BEEN
20 UNMUTED, THAT IS YOUR INDICATION TO BEGIN SPEAKING.

21 JONATHAN B.: GOOD AFTERNOON, COMMISSIONERS.
22 MY NAME IS JONATHAN BRITAMON. I AM A VOLUNTEER WITH
23 NORTHERN NEIGHBORS AND A RESIDENT OF DISTRICT 2.

24 I WOULD LIKE TO UNDERSTAND BETTER WHY WE DID NOT
25 STUDY HIGHER GROWTH ALTERNATIVES AS ENVIRONMENTALLY

1 SUPERIOR IN THE ENVIRONMENTAL IMPACT REPORT. FROM MY
2 PERSPECTIVE, IT FAILS TO RECOGNIZE THE STATEWIDE AND
3 REGIONAL ENVIRONMENT BENEFITS OF HIGHER GROWTH
4 ALTERNATIVES.

5 THE HOUSING CRISIS WE HAVE IN THE BAY AREA IS
6 ALSO AN ENVIRONMENTAL DISASTER. WE HAVE THE HIGHEST
7 SHARE OF SUPER COMMUTERS IN THE NATION DUE TO THIS
8 HOUSING CRISIS.

9 AND IF WE BUILT LESS HOUSING IN SF, IT MEANS
10 MORE CO2 EMISSIONS, MORE BUILDING AND WILD LAND
11 URBAN-INTERFACE WITH FIRE RISKS AND BULLDOZING OF SCENIC
12 VISTAS OUTSIDE OF SF, WHEREAS BUILDING IN SF MEANS
13 HAVING PUBLIC TRANSIT OPTIONS AND, EFFICIENT
14 MULTIFAMILY HOUSING AVAILABLE.

15 SO I WOULD ASK THE COMMISSION AND THE STAFF
16 PREPARING THIS REPORT TO PLEASE STUDY THE REZONING OF
17 OVER 80,000 ADDITIONAL UNITS AS OUR RHNA OBLIGATION
18 REQUIRES FROM THE PERSPECTIVE OF [INDISCERNIBLE
19 DUE TO POOR CONNECTION]. THANK YOU.

20 EILEEN BOKEN: EILEEN BOKEN, CSFN (COALITION FOR
21 SAN FRANCISCO NEIGHBORHOODS) [INDISCERNIBLE] SPEAKING
22 ON MY OWN BEHALF.

23 DOES THE DRAFT EIR ADEQUATELY ADDRESS THE
24 FOLLOWING: THE SFPUC URBAN WATER MANAGEMENT PLAN STATES
25 THAT THERE IS ADEQUATE WATER FOR FUTURE DEVELOPMENT. ON

1 THE OTHER HAND, THERE IS CURRENT WATER RATIONING WHICH
2 IS EXPECTED TO BECOME MANDATORY.

3 CAL ISO STATES THAT THERE MAY BE ENERGY
4 SHORTAGES DURING INTENSE WEATHER CONDITIONS. THESE
5 INTENSE WEATHER CONDITIONS ARE EXPECTED TO WORSEN IN THE
6 FUTURE.

7 THE CITY HAS BEEN IDENTIFIED AS AN URBAN HEAT
8 ISLAND. INCREASED DEVELOPMENT AND LOSS OF OPEN SPACE IS
9 EXPECTED TO MAKE THE URBAN HEAT ISLAND EFFECT WORSE.

10 EVEN CURRENTLY, THE CITY IS UNDERPROTECTED BY
11 ITS EMERGENCY FIRE-FIGHTING WATER SYSTEM FROM
12 CATASTROPHIC FIRES SIMILAR TO THOSE AFTER THE 1906
13 EARTHQUAKE.

14 HAS THE ISSUE OF CARRYING CAPACITY EVEN BEEN
15 ADDRESSED?

16 SOME HAVE CALLED THE NEW RHNA NUMBERS
17 ASPIRATIONAL. OTHERS HAVE SAID THEY ARE INTENTIONALLY
18 UNACHIEVABLE BECAUSE NEW METHODOLOGY USED BY --- BASED
19 ON SB 828 BY SCOTT WEINER. EVEN THE STATE AUDITOR HAS
20 FOUND THE ACD METHODOLOGY TO BE FLAWED.

21 IN THE PAST NET RHNA NUMBERS HAVE NO
22 CONSEQUENCES. NOW THEY HAVE SERIOUS CONSEQUENCES BASED
23 ON SB 35 BY SCOTT WIENER. THESE CONSEQUENCES COULD
24 INCLUDE FINES, PENALTIES AND EVEN BY-RIGHT APPROVALS.

25 SOME HAVE SAID THE CITIES ARE BEING SET UP FOR

I-Boken-3
Conf'd

1 FAILURE, AND AS MY PROPHECY STATES, IN THE END TIME
2 THERE WILL BE NO SECRETS. THANK YOU.

3 DON MISUMI: GOOD AFTERNOON, COMMISSIONERS. MY
4 NAME IS DON MISUMI, AND I'M WITH RICHMOND DISTRICT
5 RISING, AND WE ARE MEMBERS IN THE RACE AND EQUITY IN ALL
6 PLANNING COALITION.

7 THE REP COALITION AND RICHMOND DISTRICT RISING
8 URGE THIS PLANNING COMMISSION TO FORMALLY EVALUATE THE
9 TAX AND POLICIES THAT ENCOURAGE DEMOLITION,
10 DISPLACEMENT, AND PRIVATE SPECULATION THAT DEVELOPMENT
11 WILL HAVE ON OUR COMMUNITIES AND ON THE ENVIRONMENT.

12 REP ENVISIONS AND WORKS FOR PLANNING
13 THAT PUTS THE EXPERTISE OF OUR COMMUNITIES TO THE
14 FOREFRONT TO SOLVE ISSUES OF DISPLACEMENT,
15 UNAFFORDABILITY AND INEQUALITY.

16 FROM A PERSONAL PERSPECTIVE, MY FAMILY AND MY
17 COMMUNITY HAS BEEN DIRECTLY IMPACTED BY DISPLACEMENT.
18 [INDISCERNIBLE] CITY-MANDATED DESTRUCTION OF OUR
19 HISTORIC JAPANTOWN COMMUNITY BY THE REDEVELOPMENT AGENCY.
20 NOBODY IN CITY GOVERNMENT CARED ABOUT THE ENVIRONMENTAL
21 IMPACT FOR THE THOUSANDS THAT TOOK PLACE AT THAT TIME,
22 AND IT SEEMS TO STILL BE THE CASE TODAY.

23 THE DRAFT ENVIRONMENTAL IMPACT REPORT FAILS TO
24 STUDY THE IMPACTS OF THE GENTRIFICATION AND
25 DISPLACEMENT. IMPACT PH-2 STATES THAT THE

1 PROPOSED ACTION WOULD NOT DISPLACE THE SUBSTANTIAL
2 NUMBERS OF EXISTING PEOPLE OR HOUSING UNITS,
3 NECESSITATING THE DESTRUCTION OF REPLACEMENT HOUSING.

4 YET DURING THE CURRENT HOUSING ELEMENT CYCLE,
5 THOUSANDS OF UNITS HAVE BEEN DEMOLISHED, AND THIS NEW
6 HOUSING ELEMENT CONTAINS STRATEGIES THAT SPECIFICALLY
7 CALL FOR DEMOLITION OF EXISTING HOUSING.

8 THIS FAILED ASSESSMENT OF THE REAL IMPACTS FACING
9 OUR COMMUNITIES WILL RESULT IN FURTHERING THE
10 DEVASTATION THAT HAS ALREADY BEEN PERPETRATED BY THE
11 CITY. THE HOUSING ELEMENT MUST BE CENTERED ON RACIAL
12 AND SOCIAL EQUITY AND NOT SIMPLY PAY LIP SERVICE TO IT.

13 AND THE EIR MUST STUDY AN ALTERNATIVE THAT
14 PRIORITIZES BUILDING AFFORDABLE HOUSING FIRST, ELIMINATE
15 STRATEGIES THAT DISPLACE, AND MAKE SURE PUBLIC LANDS
16 ARE DEVELOPED FOR AFFORDABLE HOUSING, COMMUNITY SERVICES,
17 SMALL BUSINESSES, AND PUBLIC OPEN SPACES. THANK YOU.

18 ANASTASIA YOVANOPOULOS: HELLO. THIS IS
19 ANASTASIA YOVANOPOULOS, A MEMBER OF SAN FRANCISCO TENANTS
20 UNION, AND WE ARE A MEMBER ORGANIZATION OF THE RACE AND
21 EQUITY IN ALL PLANNING COALITION URGING YOU TO THOROUGHLY
22 EVALUATE THE IMPACTS OF POLICIES THAT ENCOURAGE
23 DEMOLITION, DISPLACEMENT, AND PRIVATE SPECULATIVE
24 DEVELOPMENT WILL HAVE ON OUR COMMUNITIES AND THE
25 ENVIRONMENT.

1 REP COALITION ENVISIONS AND WORKS FOR
2 SAN FRANCISCO THAT EMPOWERS HISTORICALLY MARGINALIZED
3 COMMUNITIES, BIPOC IMMIGRANTS, LOW-INCOME AND NO-INCOME
4 RESIDENTS, SENIORS AND PEOPLE WITH DISABILITIES TO
5 DETERMINE OUR FUTURES.

6 THE DRAFT EIR REFERENCES PLANNING'S INTENTION TO
7 HAVE HOUSING ELEMENT 22 BE SAN FRANCISCO'S FIRST THAT
8 CENTERS RACIAL AND SOCIAL EQUITY. MULTIPLE TIMES IT
9 SAYS THIS, BUT IT FAILS TO STUDY ANY PROJECT ALTERNATIVE
10 THAT CENTERS ON AND PRIORITIZES RACIAL AND SOCIAL EQUITY
11 OR RESULTS IN EQUITABLE OUTCOMES.

12 ALL THE PROJECT ALTERNATIVES THAT HAVE BEEN
13 STUDIED ARE MARKET-BASED STRATEGIES, AND NONE PROPOSED
14 TO BUILD AFFORDABLE HOUSING FIRST.

15 IT'S NOT MENTIONED IN THE NO PROJECT ALTERNATIVE
16 THAT OUR CURRENT HOUSING ELEMENT HAS RESULTED IN AN
17 ASTOUNDING OVERPRODUCTION OF UNAFFORDABLE HOUSING AND A
18 GROSS UNDERPRODUCTION OF AFFORDABLE HOUSING.

19 THOUSANDS OF UNITS HAVE BEEN DEMOLISHED DURING
20 THE CURRENT HOUSING ELEMENT CYCLE AND HOUSING ELEMENT 22
21 RELIES HEAVILY ON STRATEGIES THAT CALL SPECIFICALLY
22 FOR DEMOLITION OF EXISTING HOUSING WHICH WILL DISPLACE AN
23 INORDINATE NUMBER OF TENANTS.

24 THE DEIR FAILS TO STUDY THE ENVIRONMENTAL
25 IMPACTS OF GENTRIFICATION AND DISPLACEMENT AND, IN FACT,

I-Yovanopoulos-2
Cont'd

1 THE IMPACT PH-2 FALSELY STATES "THE PROPOSED ACTION
2 WOULD NOT DISPLACE A SUBSTANTIAL NUMBER OF EXISTING
3 PEOPLE OR HOUSING UNITS, NECESSITATING THE CONSTRUCTION
4 OF REPLACEMENT HOUSING." THIS DEIR --

5 JONAS IONIN: I'M SORRY, MS. YOVANOPOULAS.
6 THAT'S YOUR TIME.

7 BOB FRUCHTMAN: GOOD AFTERNOON. MY NAME IS BOB
8 FRUCHTMAN. I LIVE IN DISTRICT 5, AND I'M A VOLUNTEER
9 LEAD WITH SF YIMBY SAN FRANCISCO. AND I WILL BE SPEAKING
10 FOR MYSELF.

11 THIS DRAFT EIR IS NOT A REALISTIC EIR. FOR
12 INSTANCE, SAN FRANCISCO'S GOAL ASSIGNED BY THE STATE OR
13 BY [INDISCERNIBLE] IS TO ACCOMMODATE 82,000 NEW HOUSING
14 UNITS, NOT 50,000, AND THE DRAFT EIR STATES THAT THE "NO
15 ALTERNATIVE ACTION," OR THERE IS A NO ACTION
16 ALTERNATIVE, IS AN ALTERNATIVE EVEN THOUGH IT DOES NOT
17 ADDRESS WHAT WOULD HAPPEN IF THE CITY WERE TO HAVE AN
18 IN-COMPLIANT HOUSING ELEMENT WITH THE STATE. IT DOES
19 NOT DISCUSS ANY IMPACTS THERE.

20 ADDITIONALLY, THE GOAL OF 150,000 NEW UNITS BY
21 2050 DOES NOT -- IS NOT A PACE AT WHICH SAN FRANCISCO
22 CAN MEET RHNA GOALS FOR THE STATE'S CYCLE. SAN FRANCISCO
23 IS REQUIRED TO BUILD 10,000 UNITS OF -- OR TO ACCOMMODATE
24 10,000 HOUSING UNITS PER YEAR, NOT 5,000 PER YEAR.

25 NONE OF THE ALTERNATIVES ARE REALISTIC, AND THE

I-Fruchman_2-1
Cont'd

1 CITY HAS NOT ADEQUATELY PLANNED FOR ENOUGH HOUSING UNITS
2 TO MEET RHNA. THANK YOU.

3 ZACH WEISENBURGER: GOOD AFTERNOON, COMMISSIONERS,
4 ZACH WEISENBURGER WITH THE YOUNG COMMUNITY DEVELOPERS AND
5 THE REP COALITION. WE URGE THE COMMISSION TO
6 METICULOUSLY ASSESS THE IMPACTS OF THE POLICIES PROPOSED
7 BY THE PLANNING DEPARTMENT. THESE POLICIES ENCOURAGE
8 DEMOLITION, DISPLACEMENT, AND PRIVATE SPECULATIVE
9 DEVELOPMENT WHICH WILL HAVE DETRIMENTAL IMPACTS ON OUR
10 MOST VULNERABLE COMMUNITIES AND ON THE ENVIRONMENT.

11 THE DEIR MAKES MULTIPLE REFERENCES TO PLANNING'S
12 INTENTION OF HAVING THIS BE SAN FRANCISCO'S FIRST
13 HOUSING ELEMENT THAT CENTERS RACIAL AND SOCIAL EQUITY;
14 HOWEVER, THE REPORT IS INADEQUATE AS IT FAILS TO STUDY A
15 PROJECT ALTERNATIVE THAT ACTUALLY CENTERS AND
16 PRIORITIZES RACIAL AND SOCIAL EQUITY.

17 THE REPORT FAILS TO MENTION THAT THE CURRENT
18 HOUSING ELEMENT RESULTED IN A SUBSTANTIAL OVERPRODUCTION
19 OF MARKET-RATE HOUSING AND A SIGNIFICANT UNDERPRODUCTION
20 OF AFFORDABLE HOUSING.

21 THE REPORT DOES, HOWEVER, MENTION THAT
22 MARKET-RATE HOUSING OVERWHELMINGLY BENEFITS HIGH-INCOME
23 EARNERS, BUT IT FAILS TO DISCUSS AN ALTERNATIVE APPROACH
24 THAT WOULD REVERSE THIS BIAS OF POLICIES THAT FAVORS THE
25 MARKET.

1 WHAT CENTERING RACIAL AND SOCIAL EQUITY ACTUALLY
2 LOOKS LIKE IS IMPLEMENTING POLICIES THAT PRIVILEGES
3 THOSE WHO HAVE BEEN HISTORICALLY DISADVANTAGED.

4 THIS HOUSING ELEMENT MUST BE CENTERED AROUND
5 STRATEGIES THAT PROVIDE EVERY ADVANTAGE TO THOSE WITH
6 LOWER-INCOMES AND TO PEOPLE OF COLOR OF WHOSE NEEDS HAVE
7 BEEN IGNORED FOR TOO LONG.

8 THIS DEIR GROSSLY UNDERESTIMATES THE
9 ENVIRONMENTAL IMPACT THAT WILL BE CAUSED BY THE POLICIES
10 RECOMMENDED BY THIS HOUSING ELEMENT.

11 THE DEIR MUST STUDY AN ALTERNATIVE THAT
12 PRIORITIZES BUILDING AFFORDABLE HOUSING FIRST AND
13 ELIMINATES STRATEGIES THAT DISCOURAGE DISPLACEMENT.
14 THANK YOU.

15 JOSEPH SMOOKE: GOOD AFTERNOON, COMMISSIONERS.
16 JOSEPH SMOOKE WITH THE RACE AND EQUITY IN ALL PLANNING
17 COALITION.

18 THE REP COALITION URGES THIS PLANNING COMMISSION
19 TO THOROUGHLY EVALUATE THE IMPACTS OF POLICIES AND
20 ENCOURAGE DEMOLITION DISPLACEMENT AND PRIVATE
21 SPECULATIVE DEVELOPMENT WILL HAVE ON OUR COMMUNITIES AND
22 ON THE ENVIRONMENT.

23 REP ENVISIONS AND WORKS FOR NEW POLITICAL,
24 ECONOMIC AND SOCIAL SYSTEMS THAT PRIORITIZE THE DIGNITY,
25 HEALTH, STABILITY AND ASPIRATIONS OF OUR PEOPLE OF COLOR

O-REP-1
Cont'd
O-REP-2
O-REP-3
O-REP-4
O-REP-5

1 IN LOW-INCOME COMMUNITIES AND PLACE THE NEEDS OF THE
2 PEOPLE OVER DEVELOPERS' DESIRE FOR-PROFIT.

3 THE DEIR MAKES MULTIPLE REFERENCES TO PLANNING'S
4 INTENTION OF HAVING THIS BE SAN FRANCISCO'S FIRST
5 HOUSING ELEMENT THAT CENTERS RACIAL AND SOCIAL EQUITY;
6 HOWEVER, THE DEIR IS DEFICIENT BECAUSE IT FAILS TO STUDY
7 A PROJECT ALTERNATIVE THAT CENTERS AND PRIORITIZES
8 RACIAL AND SOCIAL EQUITY.

9 THE DEIR FAILS TO STUDY THE ENVIRONMENTAL IMPACTS
10 OF GENTRIFICATION AND DISPLACEMENT. IMPACT PH-2 STATES
11 THAT "THE PROPOSED ACTION WOULD NOT DISPLACE SUBSTANTIAL
12 NUMBERS OF EXISTING PEOPLE OR HOUSING UNITS,
13 NECESSITATING THE CONSTRUCTION OR REPLACEMENT HOUSING;
14 HOWEVER, DURING THE CURRENT HOUSING ELEMENT CYCLE, MORE
15 THAN 4200 UNITS HAVE BEEN DEMOLISHED, AND THIS NEW
16 HOUSING ELEMENT CONTINUES STRATEGIES THAT SPECIFICALLY
17 CALLS FOR DEMOLITION OF EXISTING HOUSING.

18 THIS DEIR'S DEFICIENT IN THAT IT GROSSLY
19 UNDERESTIMATES THE ENVIRONMENTAL IMPACTS THAT WILL BE
20 CAUSED BY THE POLICIES RECOMMENDED BY THE HOUSING
21 ELEMENT. BY NOT TRULY CENTERING THE HOUSING ELEMENT ON
22 RACIAL AND SOCIAL EQUITY, THIS HOUSING ELEMENT WILL
23 CAUSE DISPLACEMENT ON A SCALE THAT MAKES REDEVELOPMENT
24 AND URBAN RENEWAL LOOK QUAIN.

25 THE DEIR MUST STUDY AN ALTERNATIVE THAT

O-REP-5
Cont'd

1 PRIORITIZES BUILDING AFFORDABLE HOUSING FIRST ON THE
2 MANY STRATEGIES THAT ENCOURAGE DISPLACEMENT AND ENSURE
3 THAT OUR PUBLIC LANDS ARE DEVELOPED FOR AFFORDABLE
4 HOUSING, SUPPORTIVE HOUSING, COMMUNITY SERVICES, SMALL
5 BUSINESSES, AND PUBLIC OPEN SPACES. THANK YOU.

6 JEANTELE LABERINTO: HI. GOOD AFTERNOON,
7 COMMISSIONERS. I AM JEANTELE LABERINTO WITH THE
8 RACE AND EQUITY IN ALL PLANNING COALITION.

9 THE REP COALITION ENVISIONS AND WORKS FOR SAN
10 FRANCISCO WITH DIVERSE COMMUNITIES, STABLE AFFORDABLE
11 HOUSING, AND EQUITABLE ACCESS TO RESOURCES AND
12 OPPORTUNITIES.

13 AS MANY HAVE ALREADY SAID THIS AFTERNOON THE
14 DEIR MAKES REFERENCE TO A PLANNING FOCUS AS HAVING THIS
15 HOUSING ELEMENT BE THE FIRST TO CENTER RACIAL AND SOCIAL
16 EQUITY; HOWEVER, AS MANY HAVE MENTIONED, NONE OF THE
17 PROJECT'S ALTERNATIVES ACTUALLY DO SO OR MOVE US THERE.

18 IN STUDYING THE NO PROJECT ALTERNATIVE, THERE
19 IS NO MENTION OF THE FACT THAT THE CURRENT HOUSING
20 ELEMENT HAS RESULTED IN A WILDLY -- A WILD
21 OVERPRODUCTION OF UNAFFORDABLE MARKET-RATE HOUSING AND A
22 STAGGERING UNDERPRODUCTION OF AFFORDABLE HOUSING;
23 HOWEVER, THERE IS MENTION OF THE FACT THAT MARKET-RATE
24 HOUSING PROVIDES BENEFITS TO THOSE IN UPPER
25 SOCIOECONOMIC TIERS BUT DOES NOT STUDY AN ALTERNATIVE

1 THAT WILL MATERIALLY BENEFIT LOW-INCOME AND
2 PEOPLE-OF-COLOR COMMUNITIES.

3 THE DEIR MUST STUDY AN ALTERNATIVE THAT
4 PRIORITIZES BUILDING AFFORDABLE HOUSING FIRST, ELIMINATE
5 STRATEGIES THAT ENCOURAGE DISPLACEMENT, RESPECTS AND
6 FULFILLS THE GOALS OF THE CULTURAL DISTRICTS IN SAN
7 FRANCISCO, AND ENSURE THAT OUR PUBLIC LANDS ARE
8 DEVELOPED FOR AFFORDABLE HOUSING, SUPPORTIVE HOUSING,
9 COMMUNITY SERVICES, SMALL BUSINESSES, AND PUBLIC OPEN
10 SPACES.

11 THANK YOU FOR YOUR TIME.

12 SUE HESTOR: THIS IS SUE HESTOR.

13 THE EIR OMITTS A MEASURE AT ISSUE WHICH WE HAVE
14 BEEN UNDER-PRODUCING HOUSING FOR LOW-INCOME PEOPLE,
15 WORKING-CLASS PEOPLE, AND INSTEAD THE ENTIRE INCENTIVE
16 IS TO APPLY, APPROVE AND BUILD LUXURY HOUSING, AND THAT
17 HOUSING CAN'T ACCOMMODATE REAL WORKERS.

18 WORKERS IN SAN FRANCISCO IN HOTELS AND THE
19 RETAIL DISTRICT NEED HOUSING. IF THEY ARE NOT HOUSED IN
20 SAN FRANCISCO AT RENTS THEY CAN AFFORD OR HOUSING PRICES
21 THEY CAN AFFORD TO BUY, THEY WILL SPRAWL THROUGHOUT THE
22 REGION, AND THAT AFFECTS TRANSPORTATION, NOISE, AIR
23 POLLUTION, AND ALL THE THINGS THAT WE ARE TRYING TO STEP
24 DOWN.

25 INSTEAD WE ARE GOING TO WORSEN THEM BECAUSE THE

1 DEVELOPERS LIKE TO SAY WE WANT TO BUILD HOUSING, AND
2 THEY DON'T REALLY BUILD HOUSING -- WE HAVE A TICKLE-DOWN
3 THEORY OF HOUSING. IF YOU BUILD LUXURY HOUSING, MAYBE
4 WE WILL GET TRICKLE-DOWN HOUSING ELSEWHERE.

5 WE HAVE A LOT OF UNEQUAL PROVISION OF HOUSING
6 OF THE RACIAL AND SOCIAL EQUITY.

7 THOSE OF US WHO LIVE IN THE EASTERN PART ON THE
8 CITY KNOW WE HAVE MIXED COMMUNITIES, AND THEY ARE BEING
9 PUSHED OUT BY GENTRIFICATION IN OUR NEIGHBORHOODS.

10 SECOND ISSUE: YOU HAVE ALREADY -- WE HAD --
11 PARDON ME. WE SHOULD HAVE A FEW MORE DAYS TO COMMENT.
12 THE ERRATA SHEET OF THIS EIR IS DATED MAY 19TH. I SAID,
13 MAY 19? THAT IS 20 DAYS BEFORE THE DEADLINE. AND, SO
14 THAT WAS MAILED OUT ON THE 31ST --

15 JONAS IONIN: MS. HESTOR THAT IS YOUR TIME.

16 SUE HESTOR: OKAY.

17 JONAS IONIN: THANK YOU.

18 FRANCISCO DA COSTA: COMMISSIONERS, I HAVE SPOKEN TO
19 YOU ALL EARLIER. MY NAME IS FRANCISCO DA COSTA. I
20 AM THE DIRECTOR OF ENVIRONMENTAL JUSTICE ADVOCACY. I
21 HAVE BEEN FOLLOWING THIS ISSUE FOR 40 YEARS.

22 THE LAST THREE HOUSING ELEMENT REPORT, DEFECTIVE.
23 IN SHORT, I AM NOT GOING TO GO INTO THE TECHNICAL
24 ASPECTS EXCEPT TO SPEAK TO YOU AS ANY LAYMAN WOULD
25 UNDERSTAND.

1 YOU, THE PLANNING DEPARTMENT, ARE SUPPOSED TO
2 FOCUS ON QUALITY-OF-LIFE ISSUES. AS FAR AS THE FOCUS OF
3 QUALITY LIFE ISSUES IS CONCERNED IN FRANCISCO, OUR
4 CITY HAS GONE TO THE HOGS.

5 BUT WHEN IT COMES TO CLEAN WATER AND THE SEWAGE,
6 YOU, THE PLANNING DEPARTMENT, DON'T KNOW WHAT THE HELL
7 IS HAPPENING. THE TWO TREATMENT PLANTS HAVE HUNDREDS OF
8 NOTICES OF VIOLATIONS, AND NO ONE HAS A CLUE WHAT IS
9 HAPPENING.

10 AS THE PREVIOUS SPEAKERS HAVE SPOKEN, YOU KEEP
11 BUYING, YOU KEEP BUILDING MARKET-RATE HOUSING
12 BECAUSE YOU LIE IN THE POCKETS OF THE DEVELOPERS. IN
13 OTHER WORDS, YOU ARE FORCED INTO CORRUPTION.

14 NOW, IF YOU LOOK AT RENTAL HOUSING OR AFFORDABLE
15 HOUSING, THOUSANDS OF THOSE UNITS WERE DEMOLISHED OR
16 CHANGES MADE BY THE ACADEMY OF ARTS UNIVERSITY. YOU
17 DON'T KNOW WHAT THE HELL I AM TALKING ABOUT.

18 WE FOUGHT AND YOU INITIALLY THE PLANNING
19 DEPARTMENT CONFRONTED US. IT TOOK US 18 YEARS, BUT WE
20 LOST THE HOUSING. THE ARMY BUILT THOUSANDS OF HOUSING,
21 AFFORDABLE HOUSING. [INDISCERNIBLE]

22 JONAS IONIN: THANK YOU, SIR. THAT IS YOUR
23 TIME.

24 FRANCISCO DA COSTA: YEAH, A MEASLY TWO MINUTES.

25 ADAM: HI. THANKS YOU FOR HAVING ME COMMENT

1 TODAY. THIS IS ADAM FROM D-6 IN DOWNTOWN SAN FRANCISCO.

2 REALISTICALLY, WE HAVE HEARD A LOT OF COMMENTS
3 ABOUT NOT WANTING TO BUILD HOUSING, BUT IT IS
4 WELL-ESTABLISHED THAT NOT BUILDING HOUSING AND NOT
5 OPENING UP NEW HOUSING IS ONLY GOING TO BENEFIT
6 SPECULATORS AND INVESTORS, AND DOESN'T HELP PEOPLE WHO
7 WANT TO LIVE HERE.

8 WE KNOW SAN FRANCISCO IS A DESIRABLE CITY.
9 UNLESS WE WANT TO MOVE TO A HUKOU SYSTEM SIMILAR TO
10 CHINA WHERE YOU HAVE PERMITS TO LIVE IN SAN FRANCISCO,
11 AND YOU CAN'T MOVE IN WITHOUT A PERMIT, WE NEED TO BUILD
12 HOUSING.

13 WE HEAR PEOPLE TALK ABOUT -- A LOT OF COMMENTS
14 ABOUT LUXURY HOUSING. WHAT IS LUXURY HOUSING? QUITE
15 HONESTLY IT'S A SMALL APARTMENT WITH NOTHING -- NO
16 OUTDOOR SPACE, AND YOU'VE GOT A REFRIGERATOR AND MAYBE A
17 WASHER-DRYER. THAT DOESN'T SOUND LUXURY ME. THAT
18 SOUNDS PRETTY AVERAGE.

19 THE REASON IT'S CALLED LUXURY HOUSING IS BECAUSE
20 THE AVERAGE COST TO BUILD IN SAN FRANCISCO IS 700,000
21 PLUS PER UNIT, WHICH ISN'T VERY AFFORDABLE. BUT THAT
22 COST COMES IN FROM COST OF CONSTRUCTION WHEN YOU HEAR
23 PEOPLE TALK ABOUT DEVELOPERS, THEY ARE TALKING ABOUT
24 UNION CONSTRUCTION FOLKS WHO NEED TO MAKE A LIVING WAGE.

25 WE ARE ALSO TALKING ABOUT A LOT OF POLICY AND

1 REQUIREMENTS SET UP BY SAN FRANCISCO PLANNING WHICH
2 RAISES COSTS. WHEN IT TAKES THREE TO FIVE YEARS TO GET
3 SOMETHING PERMITTED, THAT DRIVES UP THE COST OF HOUSING.

4 IF WE REALLY WANT TO PUSH FOR AFFORDABLE
5 HOUSING, PLANNING NEEDS TO TAKE THESE IMPACTS INTO
6 ACCOUNT AS WELL BECAUSE THE MORE -- THE LONGER IT TAKES,
7 THE MORE ROADBLOCKS WE PUT UP, WE INCREASE THE COST; WE
8 DON'T HAVE AFFORDABLE HOUSING, AND WE BENEFIT
9 SPECULATORS, AND WE BENEFIT EXISTING PROPERTY OWNERS.
10 THE ONLY PEOPLE WHO BENEFIT ARE THOSE WHO HAVE BEEN HERE
11 FOR YEARS.

12 THE EIR NEEDS TO TAKE A REALISTIC APPROACH TO
13 ADDING NEW HOUSING; OTHERWISE, WE'RE GOING TO LOSE ANY
14 CONTROL WE HAVE --

15 JONAS IONIN: THANK YOU, SIR. THAT IS YOUR
16 TIME.

17 ADAM: THANK YOU.

18 JONAS IONIN: OKAY, LAST CALL FOR PUBLIC
19 COMMENT. YOU NEED TO PRESS *3 TO BE ADDED TO BE ADDED
20 TO THE QUEUE.

21 ANGELICA CABANDE: GOOD AFTERNOON, COMMISSIONERS.
22 MY NAME IS ANGELICA CABANDE, I'M WITH SOMCAN AND I AM
23 A MEMBER OF THE ORGANIZATION WITH REP COALITION.

24 I URGE THE PLANNING COMMISSION TO THOROUGHLY
25 EVALUATE THE IMPACTS AND POLICIES THAT ENCOURAGE

I-Adam-1
Cont'd

O-SOMCAN-1

O-SOMCAN-1
Cont'd

1 DEMOLITION, DISPLACEMENT, AND PRIVATE SPECULATIVE
2 DEVELOPMENT WILL HAVE ON OUR COMMUNITIES AND ON THE
3 ENVIRONMENT.

4 REP ENVISIONS AND WORKS FOR PLANNING THAT PUTS
5 THE EXPERTISE OF OUR COMMUNITIES AT THE FOREFRONT TO
6 SOLVE ISSUES OF DISPLACEMENT, UNAFFORDABILITY, AND
7 EQUALITY.

8 THE DEIR MAKES MULTIPLE REFERENCES TO PLANNING'S
9 INTENTION OF THIS BEING SAN FRANCISCO'S FIRST HOUSING
10 ELEMENT THAT CENTERS RACIAL AND SOCIAL EQUITY; HOWEVER,
11 THE DEIR IS DEFICIENT BECAUSE IT FAILS TO STUDY A
12 PROJECT ALTERNATIVE THAT CENTERS AND PRIORITIZES RACIAL
13 AND SOCIAL EQUITY.

14 THE EIR DOES NOT STUDY ANY PROJECT ALTERNATIVES
15 THAT WOULD HAVE TRULY EQUITABLE OUTCOMES. THE DEIR MUST
16 STUDY A PROJECT ALTERNATIVE THAT PRIORITIZES AFFORDABLE
17 HOUSING DEVELOPMENT, RESPECTS AND FULFILLS THE GOALS
18 OF THE NINE CULTURAL DISTRICTS, AND PROVIDES SUPPORTIVE
19 AFFORDABLE HOUSING FOR THOSE CURRENTLY WITHOUT HOMES.

20 THIS DEIR IS DEFICIENT IN THAT IT GROSSLY
21 UNDERESTIMATES THE ENVIRONMENTAL IMPACTS THAT WILL BE
22 CAUSED BY THE POLICIES RECOMMENDED BY THIS HOUSING
23 ELEMENT. THE DEIR MUST STUDY AN ALTERNATIVE THAT
24 PRIORITIZES BUILDING AFFORDABLE HOUSING FIRST,
25 ELIMINATES STRATEGIES THAT ENCOURAGE DISPLACEMENT,

O-SOMCAN-2
Cont'd

1 ENSURES THAT OUR PUBLIC LANDS ARE DEVELOPED FOR
2 AFFORDABLE HOUSING, SUPPORTIVE HOUSING, COMMUNITY
3 SERVICES, SMALL BUSINESSES AND PUBLIC OPEN SPACE.

4 THANK YOU FOR YOUR TIME.

5 TESS WELBORN: HELLO, COMMISSIONERS. TESS
6 WELBORN. THE RACE AND SOCIAL EQUITY ORGANIZATION HAS
7 REALLY COVERED MOST OF THE POINTS.

8 YOU KNOW, 500 PAGES, AND WHAT CAN YOU SAY? THE
9 IDEA THAT WE CAN BUILD 5,000 UNITS A YEAR IN SAN
10 FRANCISCO IS RIDICULOUS. IT HAS NEVER HAPPENED, AND IT
11 WILL NOT HAPPEN WITHOUT FUNDING.

12 SO, THE ALTERNATIVE TO THE PROPOSED PROJECT MUST
13 BE EXPLORED FURTHER. I ESPECIALLY WANT TO SAY THAT
14 BUILDING HOUSING, AFFORDABLE HOUSING, AND I MEAN HERE,
15 AFFORDABLE TO THE PEOPLE WHO ARE EARNING OR WHO HAVE
16 INCOME OF 20 TO 80 PERCENT OF AMI, WHICH IS ABOUT HALF OF
17 OUR CITY, MUST BE WHAT'S BUILT FIRST.

18 IT IS A PROVEN FACT THAT TRICKLE-DOWN HOUSING
19 DOES NOT WORK. WE KNOW FROM NEXUS STUDIES AGAIN
20 THAT EVERY MARKET-RATE HOUSING OF 100 UNITS THAT ARE
21 BUILT NEEDS ABOUT 30 UNITS OF AFFORDABLE HOUSING JUST TO
22 SUPPORT THOSE 100 UNITS OF MARKET-RATE HOUSING,
23 ASSUMING, OF COURSE, THAT THOSE ARE ACTUALLY OCCUPIED
24 AS OPPOSED TO MERELY INVESTMENT PROPERTIES.

25 SO, A LOT TO BE SAID MORE ABOUT THIS, BUT IF IT

↑
I-Welborn-1
Cont'd

1 IS NOT WORKABLE, AND IT IS PARTLY NOT WORKABLE BECAUSE
2 YOU HAVE CHOSEN NOT TO BUCK THE RHNA GOALS, WHICH ARE
3 RIDICULOUS. THANK YOU.

4 JONAS IONIN: OKAY. FINAL LAST CALL FOR PUBLIC
5 COMMENT.

6 SEEING NO ADDITIONAL REQUEST TO SPEAK,
7 COMMISSIONERS, PUBLIC COMMENT IS CLOSED. THIS MATTER IS
8 NOW BEFORE YOU.

9 PRESIDENT TANNER: THANK YOU. I DO SEE
10 COMMISSIONER KOPPEL AND MOORE IN THE QUEUE. THAT WAS
11 FROM A LITTLE BIT AGO; SO THEY MAY HAVE NOT MEANT TO
12 SPEAK, BUT I DO WANT TO GIVE THEM THE OPPORTUNITY, AND I
13 SEE COMMISSIONER DIAMOND HAS ALSO JOINED.

14 COMMISSIONER KOPPEL, DO YOU HAVE SOMETHING TO
15 ADD?

16 JOEL KOPPEL: YEAH. THAT WAS JUST PREVIOUSLY TO
17 POSSIBLY RECUSE COMMISSIONER RUIZ, BUT, AGAIN, GREAT
18 WORK BY THE DEPARTMENT. ALWAYS IMPRESSED WITH THE
19 ENVIRONMENTAL REVIEW DEPARTMENT'S WORK.

20 PRESIDENT TANNER: THANK YOU.

21 KATHRIN MOORE: I HAVE -- MY COMMENT. MY NAME
22 IS UP FOR PREVIOUS CONSIDERATION. DOESN'T HAVE NOTHING
23 TO DO WITH THIS MOMENT.

24 PRESIDENT TANNER: GREAT. THANK YOU.
25 COMMISSIONER DIAMOND?

1 SUE DIAMOND: YEAH. I HAD A NUMBER OF VERY
2 SPECIFIC COMMENTS ON THE DRAFT EIR ALTHOUGH I WANTED
3 START BY COMPLIMENTING STAFF ON A VERY DETAILED LOOK AT
4 A VERY COMPLICATED SUBJECT WITH I THINK IT'S AN
5 EXHAUSTIVE REVIEW AND DISCLOSURE PROCESS THAT I THOUGHT
6 TO BE EXTREMELY HELPFUL IN GUIDING DECISION MAKING.

7 SO THESE ARE JUST A FEW COMMENTS ON AREAS THAT I
8 THOUGHT WARRANTED SOME RESPONSE FROM THE DEPARTMENT. SO
9 THERE ARE A HALF-DOZEN OF THEM.

10 SO THE FIRST ONE IS THAT THE EIR STATES IN
11 SEVERAL PLACES THAT THE PROPOSED ACTION REPRESENTS ONE
12 POSSIBLE DISTRIBUTION OF FUTURE HOUSING DEVELOPMENT
13 GROWTH, AND WE COULD END UP WITH ZONING CHANGES THAT
14 ARE SOMEWHAT DIFFERENT THAN WHAT'S SHOWN IN THE PROPOSED
15 ACTION.

16 IN PARTICULAR, WHILE SEVERAL OF THE MAJOR
17 COMMERCIAL CORRIDORS ARE APPROPRIATELY RAISED TO
18 85 FEET, AS I PREVIOUSLY STATED IN THESE HEARINGS I
19 DISAGREE WITH THE POLICY OF INCREASING THE RESIDENTIAL
20 SIDE STREETS TO 85 FEET -- BECAUSE THAT'S ROUGHLY THE
21 EQUIVALENT OF ADDING 4 TO 6 STORIES OF HEIGHT ON TOP OF
22 THE EXISTING 2- TO 3-STORY HOUSING STOCK ON THOSE
23 STREETS.

24 IT MAKES A GREAT DEAL OF SENSE TO ME TO INCREASE
25 THE HEIGHT LIMITS ON THE SIDE STREETS TO 55 FEET OR IN

1 SOME CASES 65 FEET. BUT I THINK RAISING THE HEIGHT
2 LIMIT ON THE SIDE STREETS TO 85 FEET IS UNNECESSARILY
3 DISRUPTIVE AND TOO MASSIVE A SHIFT IN CHARACTER.

4 SO, CONSEQUENTLY WE ARE NOT MAKING THE DECISION
5 TODAY ABOUT THE RECOMMENDED ZONE CHANGES OR HEIGHT
6 CHANGES, BUT I WANTED TO MAKE SURE THAT THE EIR IS BROAD
7 ENOUGH TO COVER PROPOSED REZONINGS AND HEIGHT CHANGES
8 THAT MAINTAIN OR EVEN INCREASE 85 FEET ALONG THE
9 COMMERCIAL STRIPS, BUT STEP DOWN THE PROPOSED 85-FOOT
10 ZONE ON THOSE RESIDENTIAL SIDE STREETS TO 65 OR 55 FEET.

11 AND IF NECESSARY, THE UNITS LOST BY THAT HEIGHT
12 DECREASE SHOULD BE MOVED ELSEWHERE ON THE WEST SIDE, LIKE
13 FOR EXAMPLE, INCREASING COMMERCIAL CORRIDORS TO HIGHER
14 THAN 65 FEET.

15 SOME OF THE CORRIDORS ARE ONLY AT 65 FEET AND
16 MAYBE THOSE SHOULD BE RAISED AT 85 FEET, AND SOME OF THE
17 SIDE STREETS THAT ARE ONLY AT 40 FEET COULD INSTEAD BE
18 RAISED TO 55 OR THOSE THAT ARE 55 SHOULD BE RAISED TO 65
19 FEET.

20 SO IT'S REALLY IS A COMMENT AND CONCERN TO
21 MAKE SURE THAT THE DRAFT EIR IS BROAD ENOUGH TO COVER
22 ZONE CHANGES THAT AREN'T EXACTLY WHAT'S PROPOSED IN THE
23 EIR BUT ARE IN CHARACTER WITH IT BUT SHIFT AROUND SOME
24 OF THAT DENSITY AND HEIGHT.

25 SECOND COMMENT, AND IT'S RELATED, AND THAT IS

1 THAT NONE OF THE 10 VISUAL SIMULATIONS REALLY SHOWED
2 WHAT THE DEVELOPMENT WOULD LOOK LIKE WITH THE
3 RESIDENTIAL SIDE STREET HEIGHT INCREASES, WHETHER THEY
4 BE 55, 65 OR 85 FEET.

5 MOST OF THE SHOTS THERE ARE EITHER VERY
6 LONG-DISTANCE VIEWS OR ARE JUST DOWN THE COMMERCIAL
7 STREETS, AND I THINK IT WOULD BE HELPFUL TO ADD A VISUAL
8 SIMULATION THAT BETTER SHOWS WHAT HAPPENS ON SO MANY OF
9 OUR SIDE STREETS WITH THESE HEIGHT INCREASES.

10 THIRD IS WHY IT IS WAY TOO SOON TO DO ANYTHING
11 OTHER THAN SPECULATE, I'M CURIOUS AT WHAT POINT OR WHEN
12 OR HOW WE GO ABOUT RECOGNIZING THAT WHAT WE'RE SEEING AS
13 A RESULT OF THE PANDEMIC MAY NOT BE SOMETHING WE
14 NECESSARILY THINK WILL RECOVER.

15 WHAT I MEAN IS WE MAY NOT NEED AS MUCH OFFICE
16 SPACE DOWNTOWN AS WE PLANNED FOR. AND SOME OF THAT
17 OFFICE SPACE MAY BE DEVELOPED OR REDEVELOPED WITH
18 RESIDENTIAL SPACE.

19 HOW, IF, AND WHEN MIGHT THAT ELEMENTAL SHIFT OR
20 HAVE THOUGHTS ABOUT OFFICE SPACE DOWNTOWN AND
21 SUBSTITUTES FOR IT AFFECT OUR THINKING ABOUT WHAT YOU
22 ARE PROPOSING HERE ON THE WEST SIDE?

23 AND I RECOGNIZE IT IS NOT TODAY BECAUSE IT IS
24 STILL VERY SPECULATIVE, BUT HOW DOES THAT POTENTIAL
25 CHANGE OVER THE NEXT FEW YEARS PLAY INTO OUR THINKING

A-Diamond-3
Cont'd

1 ABOUT WHAT WE ARE DOING NOW ON THE WEST SIDE?

2 FOURTH POINT IS AS WE INCREASE DENSITY ON THE
3 WEST SIDE, WE ARE GOING TO BE LOSING BACKYARDS,
4 INCREASING SHADING ON SCHOOL YARDS AND PARKS WHILE AT
5 THE SAME TIME INCREASING DEMAND FOR RECREATIONAL
6 FACILITIES ON THE WEST SIDE, WHICH IS JUST PLAYGROUNDS
7 AND ATHLETIC FIELDS.

8 PAGE 4.1-108 SAYS THAT "ALTHOUGH THE
9 RECREATIONAL FACILITIES ON THE WEST SIDE ARE LARGER AND
10 FAR MORE ABUNDANT, THAT THE INCREASE IN DEMAND AS A
11 RESULT OF THE FUTURE DEVELOPMENT CONSISTENT WITH THE
12 HOUSING ELEMENT UPDATE WOULD EXCEED THE EXISTING
13 CAPACITIES OF THESE RECREATIONAL FACILITIES."

14 THE DRAFT EIR THEN GOES ON TO STATE THAT ONLY
15 SIX OF THE SIXTY-SIX PLANNED NEW RECREATIONAL FACILITIES
16 ARE ON THE WEST SIDE. THAT DRAFT EIR CITES SOME BROAD
17 POLICIES ABOUT PARK AND REC MAINTAINING PARKS TO REDUCE
18 THE PHYSICAL DEGRADATION, BUT I AM JUST HAVING A HARD
19 TIME, BASED ON THE INFORMATION PROVIDED SO FAR,
20 RECONCILING THE CONCLUSION OF "NO PHYSICAL
21 DEGRADATION" IN LIGHT OF THE INTENSE PROPOSED INCREASE IN
22 USE FROM THE PROPOSED ACTION, WHEN ONLY SIX OF
23 SIXTY-SIX NEW PARKS AND FACILITIES ARE PLANNED FOR THE
24 WEST SIDE.

25 SO, I WOULD LIKE TO SEE A LOT MORE SUPPORTIVE

A-Diamond-4
Cont'd

1 INFORMATION THAT GETS TO THE DEIR'S CONCLUSION ON THIS
2 POINT.

3 THE POINT IS THE FOCUS OF THIS EIR APPROPRIATELY
4 IS JUST ON THE HOUSING ELEMENT. BUT HOW DO WE AS A
5 PLANNING DEPARTMENT AND COMMISSION ENSURE THAT THE
6 INFRASTRUCTURE NEEDED TO SERVE THE ADDITIONAL HOUSING ON
7 THE WEST SIDE KEEPS A PACE? AND I'M PARTICULARLY
8 WORRIED ABOUT TRANSIT AND WASTEWATER CAPACITY UPGRADES
9 IN PARTICULAR.

10 IT WOULD BE HELPFUL TO KNOW WHAT COORDINATION
11 HAPPENS AMONG THE VARIOUS CITY DEPARTMENTS TO ENSURE THE
12 TIMELINE FOR STUDYING, FUNDING, AND DEVELOPING THE
13 INFRASTRUCTURE IS GOING TO KEEP UP WITH THE DEVELOPMENT
14 OF THE HOUSING PACE THAT WE'RE PROPOSING THAT'S BEING
15 STUDIED IN THIS DRAFT EIR.

16 AND FINALLY, ON PAGE 6-43, IT WOULD BE HELPFUL
17 IF YOU CAN CONFIRM THAT THE MITIGATION POLICIES POINTED
18 OUT IN THE PRESERVATION ALTERNATIVE WOULD NOT MATERIALLY
19 IMPAIR THE SIGNIFICANCE OF BUILT-ENVIRONMENT HISTORIC
20 RESOURCES AND HISTORIC DISTRICTS.

21 WHY NOT JUST TO THE BUENA VISTA, INGLESIDE,
22 MARINA, AND WESTERN ADDITION NEIGHBORHOODS BUT APPLY
23 GENERALLY TO THE ENTIRE WEST SIDE?

24 SO THANK YOU FOR TAKING A LOOK AT THOSE
25 COMMENTS.

A-Diamond-5

A-Diamond-6

1 PRESIDENT TANNER: THANK YOU, COMMISSIONER
2 DIAMOND.

3 OTHER COMMISSIONERS HAVE COMMENTS?

4 COMMISSIONER IMPERIAL?

5 THERESA IMPERIAL: THANK YOU. I'D LIKE TO HEAR
6 WHAT OTHER COMMISSIONERS HAVE TO SAY, BUT I'LL PUT ON MY
7 THOUGHTS AT FIRST.

8 YEAH, THIS EIR IS QUITE VOLUMINOUS, AND THERE
9 ARE A LOT ACTUALLY TO SEEK THROUGH, AND ONE THING THAT I
10 DID NOTICE OR AS EVEN THOUGH IT IS VERY COMPREHENSIVE
11 AND VERY DETAILED IN ALL THE ASPECTS OF ENVIRONMENTAL
12 OF EIR ITSELF, I DO LOOK INTO THE SIGNIFICANT AND
13 UNAVOIDABLE IMPACTS. I USUALLY LOOK INTO THAT FIRST.
14 ESPECIALLY WHEN --

15 AND ONE THING JUST WHAT COMMISSIONER DIAMOND KIND
16 OF TOUCHED ON, TOO, IS THE ISSUE ON THE TRANSPORTATION
17 CIRCULATION AND UTILITIES AND SERVICE SYSTEM, AND THOSE
18 ARE THE TWO THINGS WHERE MITIGATION IS NOT EVEN FEASIBLE.

19 SO I AM WORRIED ON THAT, AND I DON'T THINK THAT
20 IS SOMETHING THAT IS ADEQUATELY ADDRESSED, OR PERHAPS, I
21 WOULD LIKE TO HEAR MORE IN TERMS OF WHETHER MITIGATION
22 OR THE POLICIES THAT WE WILL HAVE OR THE CITY'S PLANING
23 TO DO ON THIS.

24 AND IN OTHER -- AND AS WHAT OTHER PUBLIC
25 COMMENTS WAS MENTIONED ABOUT THE ENVIRONMENTAL IMPACTS

1 ON DEMOLITION, IT SOUNDS LIKE THIS IS COVERED UNDER
2 OTHER AREAS OF NOISE AND VIBRATION, AIR QUALITY, WIND
3 AND SHADOW; HOWEVER, YOU KNOW, I THINK THE WAY WE WILL
4 LOOK INTO THIS IN THE ENVIRONMENTAL IMPACT ASPECT WHICH
5 IS ALREADY IN CEQA ITSELF, BUT IT KIND OF FAILS TO
6 CONNECT INTO WHAT WE ALWAYS LOOK INTO THE RACIAL AND
7 SOCIAL EQUITY.

8 SO I THINK THAT'S WHAT THE COMMENTS -- WHEN WE
9 LOOK INTO THIS EIR, WE ARE REALLY LOOKING INTO THE
10 ENVIRONMENTAL IMPACT, BUT IN THE WAY OF HOW WE CORRELATE
11 THIS TO THE RACIAL AND SOCIAL IMPACT.

12 SO, I SEE THAT WE HAVE IN TABLE 6.8, THERE IS
13 THE PROJECT OBJECTIVE AND HOW THE ALTERNATIVES ARE
14 ACTUALLY BEING MET ON THIS; HOWEVER, IT IS ALSO NOT
15 ADEQUATELY I WOULD SAY EXPLAINED IN TERMS OF THE RACIAL
16 AND SOCIAL EQUITY.

17 SO, THOSE ARE MY INITIAL COMMENTS, AND I WOULD
18 LIKE TO HEAR WHAT OTHER COMMISSIONERS SAY. THANKS.

19 PRESIDENT TANNER: THANKS, COMMISSIONER
20 IMPERIAL.

21 COMMISSIONER MOORE?

22 KATHRIN MOORE: WE ARE SHARING SIMILAR CONCERNS,
23 AND I SUPPORT COMMISSIONER DIAMOND'S EXTENSIVE LIST OF
24 QUESTIONS AND WHAT ELSE HAS BEEN SAID SO FAR.

25 THE PRIMARY OBJECTIVE THAT I WOULD LIKE TO SEE

A-Imperial-1
Cont'd

A-Imperial-2

A-Moore-1

1 BETTER HIGHLIGHTED IN OUR DRAFT EIR IS NOT JUST THE FACT
2 THAT WE NEED MORE DEVELOPMENT -- DEVELOPMENT OF ANY
3 KIND, BUT A CLEARER EMPHASIS ON THE PRODUCTION OF VERY
4 LOW, LOW, AND MODERATE-INCOME HOUSING.

5 THAT FALLS SOMEWHAT BY THE WAYSIDE AND THE
6 NUMBERS ARE SOMEWHAT OVERWHELMING, BUT AN ACKNOWLEDGMENT
7 OF THE FACT THAT WE HAVE FALLEN FURTHER BEHIND NOT ONLY
8 SINCE 2014 BUT EVEN BEFORE THAT, I THINK IT IS TIME FOR
9 US TO BITE THE BULLET AND CREATE A CLEARER UNDERSTANDING
10 OF WHAT IT REALLY TAKES TO MEET OUR HOUSING OBLIGATIONS
11 AND HOUSING HERE AND ADDRESS THE SIGNIFICANT DEFICIENCY
12 IN AFFORDABLE HOUSING IN ORDER TO STAY A VIABLE CITY,
13 AND ALSO DEALING WITH REQUIREMENTS OF THE HOUSING
14 ELEMENT, WE NEED TO BE CLEARER IN HOW WE ADDRESS THAT.
15 AND THAT INCLUDES LISTING IMPLEMENTATION TOOLS TO ACHIEVE
16 A BETTER BALANCE.

17 ONE OF THE ISSUES AS I LOOK AT LAND SCARCITY AS
18 MARKET-RATE HOUSING GOBBLES UP FURTHER AND FURTHER LAND
19 AND GIVES FEWER OPPORTUNITIES FOR AFFORDABLE HOUSING, I
20 WOULD LIKE TO SEE THE EIR ADDRESS THE ISSUE OF LOSS DURING
21 SEA-LEVEL RISE AND COSTS ASSOCIATED WITH PREVENTING
22 SEA-LEVEL RISE, PARTICULARLY IN ESTABLISHED ALREADY
23 SETTLED PART OF THE CITY, THAT IS DOWNTOWN, AND REDOING
24 THE LOOK AT THE POTENTIAL SHIFT AS HINTED BY
25 COMMISSIONER DIAMOND WHERE LESS OFFICE DEVELOPMENT MAY

A-Moore-3
Cont'd

1 CREATE MORE ROOM FOR ADAPTIVE RE-USE TO HOUSING IN THE
2 FINANCIAL DISTRICT.

3 AND I WOULD LIKE TO SEE A CLEARER UNDERSTANDING
4 OF HOW DOWNTOWN IS THREATENED BY SEA LEVEL RISE AND HOW
5 WE BRING THAT INTO THE EQUATION IN LOOKING AHEAD FOR
6 2050 WHERE SEA LEVEL RISE WILL HAVE TAKEN A NOTICEABLE
7 TOLL ON AREAS WE ARE CURRENTLY CONSIDERING FOR
8 DEVELOPMENT.

9 I FOUND THE DISCUSSION THAT THE PUBLIC AS WELL
10 WHAT THE COMMISSIONERS LISTED INTERESTING. I DO BELIEVE
11 THAT WE NEED TO TAKE A CLOSER LOOK NOT ONLY AT
12 WASTEWATER TREATMENT BUT ALSO DRINKING WATER
13 AVAILABILITY.

14 ONE PUBLIC COMMENTER SPOKE ABOUT THE WATER
15 RESTRICTIONS. THIS IS ONLY THE BEGINNING AS CALIFORNIA
16 IS TURNING TO MORE AND MORE DESERT-LIKE CONDITIONS DUE
17 TO INCREASE IN AMBIENT TEMPERATURE. I THINK THE
18 AVAILABILITY OF DRINKING WATER WILL BE A VERY CRITICAL
19 ISSUE TO LOOK AT GROWTH.

20 TOGETHER WITH THAT I THINK WE NEED TO LOOK AT
21 OTHER IMPACTS OF WEATHER AND HOW WEATHER AFFECTS OTHER
22 ELEMENTS OF INFRASTRUCTURE, THAT IS TRANSPORTATION,
23 PRODUCTION OF CLEAN AIR ELECTRICITY, AND OVERRIDING
24 ISSUE OF TRANSPORTATION.

25 THOSE ARE MY COMMENTS FOR THE MOMENT. THE

1 DOCUMENT IS THOROUGH; THE DOCUMENT THOUGH IS VERY HARD
2 TO READ; THE SIZE OF THE MAPS AND HOW PRINTED MATERIAL
3 LOSES THE ABILITY TO SUBTLY DISTINGUISH BETWEEN THE
4 COLOR SHADES THAT ARE BEING USED. I WISH THERE WOULD
5 BE A BETTER WAY FOR PEOPLE TO COMPARE ALTERNATIVES,
6 INCLUDING UNDERSTANDING EXACTLY WHERE CHANGES WITHIN THE
7 OVERALL FABRIC OF THE CITY OCCUR.

8 IT IS THE SCALE OF THE MAPS AND THE SUBTLETY OF
9 TONES BY WHICH A LOT OF THE DETAIL PROBABLY VERY WELL
10 THOUGHT BUT GETS LOST ON THE READING END BY THOSE PEOPLE
11 WHO HAVE THESE DOCUMENTS IN FRONT OF THEM.

12 I WOULD AGREE WITH COMMISSIONER DIAMOND ON THE
13 SIMULATIONS OF WHERE I'D PROPOSE AND WHERE IMPACTS ARE,
14 THAT IS IN SECTION 1.4, 10, VISUAL SIMULATIONS OF
15 IMPACT, THEY ARE ALMOST UNDISCERNIBLE AND PERHAPS A
16 CLOSER VIEW OR PRINTING THEM ON A LARGER SCALE WOULD
17 HELP TO BETTER UNDERSTAND THAT; OTHERWISE, THANK YOU,
18 AND THIS IS A DOCUMENT THAT REQUIRES MORE TIME FOR US TO
19 UNDERSTAND AND PROPERLY COMMENT ON. I APPRECIATE IT.

20 PRESIDENT TANNER: THANK YOU. I DON'T SEE ANY
21 OTHER HANDS.

22 I'LL JUST, I GUESS, ADD TO WHAT THE
23 COMMISSIONERS SAID. I THINK PART OF WHAT IS COMING TO
24 MY MIND IS JUST HOW MUCH THIS HOUSING ELEMENT IS FORCING
25 US TO THINK ABOUT, REALLY, WHAT IT MEANS TO GROW AS A

1 CITY IN THE SIGNIFICANT NUMBERS THIS RHNA CYCLE IS
2 TALKING ABOUT, WHICH IS JUST REALLY UNPRECEDENTED FOR US
3 IN THE FACE OF WHAT SEEMS LIKE A LOT OF CALAMITIES AT
4 THE SAME TIME: CLIMATE CHANGE, DROUGHT, THE LOSS OF
5 POPULATION THAT OUR CITY HAS ALSO HAD, THE CHANGING
6 SHIFT OF JOBS WITH HYBRID WORK, AND I THINK WE KEEP
7 THINKING MAYBE WE ARE IN THIS INTERIM PERIOD WHERE
8 WE REALLY DON'T KNOW WHAT'S GOING TO HAPPEN IN THE
9 FUTURE AND THEN THAT INTERIM PERIOD KEEPS STRETCHING
10 ON AND ON AS, YOU KNOW, THERE ARE MORE SURGES OF COVID
11 AND EVERYTHING LIKE THAT.

12 SO, IT FEELS A LITTLE BIT DIFFICULT TO PLAN
13 AND YET I THINK WE ARE DOING A REALLY GOOD JOB OF TRYING
14 TO THINK ABOUT THESE BIG SYSTEMS: TRANSPORTATION, WATER,
15 BOTH WASTEWATER AND DRINKING WATER.

16 AND TO ME IT'S -- THERE IS THE ENVIRONMENTAL
17 IMPACT AND THEN THAT TO ME IS THE CALL FOR ACTION FOR
18 WHAT WE ARE GOING TO DO ABOUT IT AS FOR THE CITY? HOW
19 ARE WE GOING TO MITIGATE THAT? HOW ARE WE GOING TO
20 BUILD WHAT WE NEED?

21 AND THAT'S NOT JUST THE UNDER GROUND
22 INFRASTRUCTURE BUT THE PEOPLE INFRASTRUCTURE, THE PARKS,
23 THE OPEN SPACE, YOU KNOW, THINGS THAT ARE NOT
24 ENVIRONMENTAL, THE SCHOOLS, LIBRARIES, ETC., THAT ARE
25 GOING TO BE IMPACTED BY THE POPULATION GROWTH WE ARE

A-Tanner-1
Cont'd

1 PLANNING FOR.

2 AND THEN OF COURSE THIS IS LOOKING AT THE 2050
3 TIME PERIOD. I THINK FOR SOME MEMBERS OF THE PUBLIC WHO
4 WERE WRITING IN, I THINK THAT WAS A LITTLE BIT
5 CONFUSING, JUST A LOT OF COMMENTS OF, YOU KNOW, WE ARE
6 NOT PLANNING FOR THE RIGHT AMOUNT OF HOUSING.

7 AND I THINK MAYBE THERE IS SOME WORK WE DO TO TRY
8 AND COMMUNICATE WHAT AND WHY WE ARE USING THE 2050
9 BASELINE BECAUSE I THINK A LOT OF E-MAILS WERE SAYING,
10 YOU KNOW, WE ARE NOT PLANNING FOR THE RHNA CYCLE, AND
11 I DON'T THINK THAT'S EXACTLY WHAT'S HAPPENING, BUT
12 THAT'S HOW IT'S BEING READ BY THE PUBLIC.

13 SO, MAYBE WE CAN ILLUMINATE THAT A BIT FOR FOLKS
14 SO THAT IT'S EASIER FOR THEM TO UNDERSTAND KIND OF WHY
15 WE ARE USING THAT TIMELINE.

16 THOSE ARE ALL MY COMMENTS. I DON'T KNOW IF
17 THERE'S ANYTHING THE DEPARTMENT WANTS TO ADD.

18 KATHRIN MOORE: I HAVE ONE MORE COMMENT, IF I
19 MAY.

20 PRESIDENT TANNER: YES, GO AHEAD.

21 KATHRIN MOORE: PRESIDENT TANNER TRIGGERED A
22 THOUGHT THAT I HAD WRITTEN BUT DIDN'T CATCH QUICKLY AS I
23 SPOKE.

24 I WOULD LIKE TO HAVE THE DEPARTMENT COMMENT ONE
25 MORE TIME ON THE NUMBERS, THE RHNA NUMBERS, THAT WERE

A-Moore-9

A-Moore-9
Cont'd

1 USED AGAIN. STATE AUDITING CHALLENGED THE RHNA NUMBERS.
2 AND IN ADDITION TO THAT I WOULD LIKE TO SEE A
3 REFLECTION WHY SAN FRANCISCO IS REPORTING A 6.3 DROP IN
4 POPULATION WITHIN THE LAST YEAR.

5 THOSE ARE ALL THINGS THAT AFFECT OUR TOTALS, AND
6 I THINK IT IS THE INCREDIBLE MAGNITUDE OF NUMBERS THAT
7 WE ARE DEALING WITH WHERE I WOULD LIKE TO SEE THE
8 CHALLENGES BOTH BY THE STATE AUDIT BOARD OR THE NOTED
9 DROP IN POPULATION TO BE CONSIDERED.

10 PRESIDENT TANNER: THANK YOU. DIRECTOR. HILLIS,
11 WERE YOU GOING TO ADD SOME COMMENTS?

12 DIRECTOR HILLIS: I JUST WANTED TO THANK CHRIS
13 KERN WHO'S HERE TODAY WHO IS RETIRING ACTUALLY IN JULY,
14 BUT HAS BEEN INSTRUMENTAL IN PUTTING -- HE'S BEEN
15 QUIET HERE TODAY, BUT HE HAS NOT BEEN QUIET DURING THIS
16 PROCESS. HE'S LED THE CHARGE ON THE EP SIDE IN PUTTING
17 TOGETHER THIS CEQA DOCUMENT.

18 SO, HE LOOKS TOO YOUNG TO RETIRE, SO I'M
19 JEALOUS, BUT HE IS, AND WE WILL MISS HIM. HE'S -- IT'S
20 NOT UNTIL JULY, SO HE'LL BE AROUND, BUT PROBABLY NOT
21 BEFORE THE COMMISSION. I JUST WANTED TO THANK HIM FOR
22 HIS WORK.

23 PRESIDENT TANNER: THANK YOU, MR. KERN, FOR YOUR
24 SERVICE ON THE HOUSING ELEMENT AND MANY, MANY OTHER
25 PROJECTS THAT YOU HAVE WORKED WITH VERY DILIGENTLY ON

1 BEHALF OF THE CITY AND COUNTY, AND WE WANT TO THANK YOU
2 FOR YOUR SERVICE, AND I KNOW IT IS A LITTLE BIT EARLY
3 BUT NOT TOO SOON TO CELEBRATE.

4 MR. KERN: I DON'T HAVE ANY REMARKS PREPARED,
5 BUT I'LL JUST SAY THANK YOU FOR THE ACKNOWLEDGMENT, AND
6 IT'S BEEN QUITE AN EXPERIENCE. THANKS.

7 COMMISSIONERS: THANK YOU.

8 JONAS IONIN: COMMISSIONERS, I DO SEE A VERY,
9 VERY LATE REQUEST FOR PUBLIC COMMENT. SHALL WE TAKE
10 THAT CALLER?

11 PRESIDENT TANNER: WE'LL HAVE COMMISSIONER
12 IMPERIAL FIRST AND THEN WE'LL GO TO THE CALLER.

13 JONAS IONIN: VERY GOOD.

14 THERESA IMPERIAL: THANK YOU, PRESIDENT TANNER.

15 I JUST WANTED TO SAY THANK YOU TO -- I'M SORRY.
16 I KNOW THAT YOU ARE RETIRING, BUT I JUST WANTED TO SAY
17 THAT BECAUSE, IN TERMS OF THIS EIR, I KNOW IT'S
18 VOLUMINOUS, AND I KNOW IT'S A LOT OF WORK FOR YOUR
19 DEPARTMENT, BUT I JUST WANT TO SAY THAT THANK YOU FOR
20 DOING THIS.

21 AND EVEN THOUGH OUR COMMENTS ARE HERE AND WE
22 EXPECT MORE BUT THE EFFORTS ARE ACTUALLY APPRECIATED.
23 SO, THANK YOU.

24 PRESIDENT TANNER: YEAH. I THINK IT'S GOOD WORK
25 THAT MAKES US WANT TO KNOW EVEN MORE. WE JUST WANT TO

1 LIKE KNOW EVEN MORE ABOUT WHAT YOU HAVE WRITTEN.

2 ALRIGHT, LET'S TAKE THAT LATE REQUESTOR OR
3 PUBLIC COMMENT.

4 GLYNIS NAKAHARA: HI. SORRY FOR THE LATENESS.
5 MY NAME IS GLYNIS NAKAHARA. I'M A COMMUNITY ORGANIZER
6 IN JAPANTOWN.

7 FIRST, I WENT TO THANK THE PLANNING DEPARTMENT
8 FOR THEIR LONG EFFORT ON THIS OPUS AND FOR REGULARLY
9 ENGAGING JAPANTOWN IN GOOD FAITH. WE REALLY APPRECIATE
10 IT.

11 I'M CONCERNED THAT THE DRAFT EIR EXISTS FOR THE
12 DEVELOPER AND [INDISCERNIBLE] IMPACTS JAPANTOWN WHICH IS
13 A CITY CULTURAL DISTRICT AND WITHOUT [INDISCERNIBLE],
14 ESPECIALLY GIVEN THE MEASURES TO FACILITATE,
15 [INDISCERNIBLE] VIGOROUS VETTING [INDISCERNIBLE] I
16 WORRY ABOUT THE SUSTAINABILITY FOR OUR COMMUNITY. I SUPPORT
17 THE NEED OF EVERY NEIGHBORHOOD TO SHARE IN THE NEED TO
18 ADDRESS HOUSING. HOWEVER, THE EIR INCLUDES PROPOSALS THAT
19 SEEM TO OVERBURDEN JAPANTOWN. [INDISCERNIBLE]

20 FIGURE 2.7 SHOWS ALMOST 5 TIMES THE HEIGHT LIMIT
21 FROM THE CURRENT 60 FEET [INDISCERNIBLE] 85 [INDISCERNIBLE]
22 [INDISCERNIBLE] WHICH WILL EXERT SIGNIFICANT
23 [INDISCERNIBLE] HOUSING ELEMENT IN JANUARY.

24 [INDISCERNIBLE] [INDISCERNIBLE] IT PROPOSES TO
25 [INDISCERNIBLE] AND I AM WONDERING HOW THIS WILL ALIGN

I-Nakahara-1
Cont'd

1 WITH [INDISCERNIBLE].

2 [INDISCERNIBLE] LEGISLATION AND POLICIES,
3 [INDISCERNIBLE] TANGIBLE AFTER THE EVISCERATION AFTER
4 WORLD WAR II.

5 AND I'M WONDERING HOW THIS PRIORITY WILL ALIGN
6 WITH THE AFORMENTIONED [INDISCERNIBLE].

7 SPEAKER.

8 DIRECTOR HILLIS: SORRY. COULD WE JUST LET THE
9 CALLER KNOW, BECAUSE, YOU KNOW, WE CAN'T HEAR ALL THESE
10 COMMENTS AND WE ARE TRANSCRIBING THESE COMMENTS.

11 JONAS IONIN: I WAS GOING TO SUGGEST TO THE
12 CALLER, AND I'M GOING TO INTERRUPT YOU AND STOP YOU
13 BECAUSE YOUR TIME IS UP.

14 IF YOU'RE ABLE TO HEAR US, YOUR COMMENTS WERE
15 VERY, VERY CHOPPY. WE HAD A VERY BAD CONNECTION, SO I
16 ENCOURAGE YOU TO SUBMIT YOUR COMMENTS IN WRITING VIA
17 E-MAIL.

18 KATHRIN MOORE: PLEASE. THAT WOULD BE GREAT.

19 JONAS IONIN: OH, AND YET ANOTHER LATE REQUEST.

20 BRUCE WOLFE: HELLO. MY NAME IS BRUCE WOLFE WITH
21 CARES COMMUNITY LAND TRUST HERE IN SAN FRANCISCO, AND WE
22 ARE A MEMBER ORGANIZATION OF THE RACE AND EQUITY
23 IN ALL PLANNING COALITION.

24 REP COALITION AND CARES CLT URGE THIS PLANNING
25 COMMISSION TO THOROUGHLY EVALUATE THE IMPACTS AND

O-CCLT-1

O-CCLT-1
cont'd

1 POLICIES THAT ENCOURAGE THE DEMOLITION, DISPLACEMENT,
2 AND PRIVATE SPECULATIVE DEVELOPMENT WILL HAVE ON YOUR
3 COMMUNITIES AND ON THE ENVIRONMENT.

4 REP AND WE ENVISION AND WORK FOR SAN FRANCISCO THAT
5 EMPOWERS HISTORICALLY MARGINALIZED COMMUNITIES, BIPOC,
6 IMMIGRANT, LOW-INCOME, AND NO INCOME RESIDENT SENIORS
7 AND PEOPLE WITH DISABILITIES TO DETERMINE THEIR FUTURE.

O-CCLT-2

8 THE DEIR MAKES MULTIPLE REFERENCES TO PLANNING
9 INTENTION OF HAVING THIS BE SAN FRANCISCO'S FIRST
10 HOUSING ELEMENT THAT EMBRACES RACIAL AND SOCIAL EQUITY;
11 HOWEVER, THE DEIR IS DEFICIENT BECAUSE IT FAILS TO STUDY
12 A PROJECT ALTERNATIVE THAT CENTERS AND PRIORITIZES RACE
13 AND SOCIAL EQUITY.

O-CCLT-3

14 THE DEIR FAILS TO STUDY THE ENVIRONMENTAL
15 IMPACTS OF GENTRIFICATION AND DISPLACEMENT. IMPACT PH-2
16 STATES THAT "PROPOSED ACTION WILL NOT DISPLACE
17 SUBSTANTIAL NUMBERS OF EXISTING PEOPLE OR HOUSING UNITS,
18 NECESSITATING THE CONSTRUCTION OF REPLACEMENT HOUSING."

O-CCLT-4

19 DURING THE CURRENT HOUSING ELEMENT CYCLE,
20 THOUSANDS OF UNITS HAVE BEEN DEMOLISHED AND THIS NEW
21 HOUSING ELEMENT CONTAINS STRATEGIES THAT SPECIFICALLY
22 CALLS FOR DEMOLITION OF EXISTING HOUSING.

23 THIS DEIR IS DEFICIENT IN THAT IT GROSSLY
24 UNDERESTIMATES THE ENVIRONMENTAL POLICIES THAT WILL BE
25 CAUSED BY POLICIES RECOMMENDED BY THIS HOUSING ELEMENT.

O-CCLT-4
Cont'd

1 BY NOT TRULY CENTERING THE HOUSING ELEMENT ON
2 RACIAL AND SOCIAL EQUITY, THIS HOUSING ELEMENT WILL
3 CAUSE DISPLACEMENT ON A SCALE THAT MAKES REDEVELOPMENT
4 AND URBAN RENEWAL LOOK QUAIN.

5 THE DEIR MUST STUDY AN ALTERNATIVE AND
6 PRIORITIZE THIS BUILDING FOR AFFORDABLE HOUSING FIRST
7 ELIMINATE [INDISCERNIBLE] --

8 JONAS IONIN: THANK YOU, SIR. THAT IS YOUR
9 TIME.

10 BRUCE WOLFE: -- AND ENSURES THAT OUR PUBLIC LANDS
11 ARE DEVELOPED FOR AFFORDABLE HOUSING, SUPPORT HOUSING,
12 COMMUNITY SERVICES, [INDISCERNIBLE]

13 JONAS IONIN: THANK YOU, SIR, THAT IS YOUR
14 TIME.

15 OKAY COMMISSIONERS. THAT WILL CONCLUDE THE
16 PUBLIC COMMENT PORTION OF THE TIME. I BELIEVE THAT ENDS
17 OUR AGENDA TODAY.

18 PRESIDENT TANNER: THANK YOU.

19 COMMISSIONER MOORE, DID YOU HAVE ADDITIONAL
20 COMMENT? DID I ALREADY GET YOUR COMMENT?

21 KATHRIN MOORE: YES, YOU ALREADY DID.

22 PRESIDENT TANNER: OKAY, GREAT, THANK YOU.

23 I DON'T SEE ANY OTHER COMMISSIONER HANDS, SO I
24 BELIEVE THAT WE NEED TO -- WE ARE JUST ADJOURNING,
25 RIGHT? BECAUSE THIS IS DEIR. ADJOURNED. [END @ 4:56.]

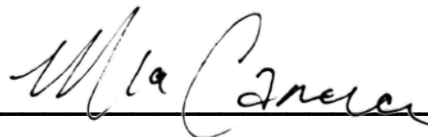
REPORTER'S CERTIFICATION

I, MIA CAMERA, A SHORTHAND REPORTER, DO HERBY
CERTIFY:

THAT THE FOREGOING LIVE SFGOV.TV PROCEEDINGS
WERE TRANSCRIBED STENOGRAPHICALLY INTO TYPEWRITTEN FORM
UNDER MY DIRECTION; THAT THE FOREGOING IS A TRUE RECORD
TO THE BEST OF MY ABILITY OF PROCEEDINGS TAKEN AT THAT
TIME.

IN WITNESS WHEREOF, I HAVE HEREUNTO TYPED MY
NAME.

DATED: JUNE 23, 2022

A handwritten signature in cursive script, appearing to read "Mia Camera", is written over a horizontal line.

MIA CAMERA

ATTACHMENT 2

Draft EIR Comment Letters and Emails

LIST OF COMMENTERS ON THE DRAFT EIR

The table below lists the commenters' names, along with the corresponding commenter codes used in RTC Chapter 4, Comments and Responses, for each set of comments; the comment format (e.g., email); and the comment date.

Commenters on the Draft EIR during the Public Review Period

Commenter Code	Name of Person and Title (if applicable)	Agency/ Organization (if applicable)	Comment Format ¹	Date ²
Federal, State, Regional, and Local Agencies, Boards, and Commissions				
A-Caltrans	Yunsheng Luo, Associate Transportation Planner	California Department of Transportation (Caltrans)	Email	May 16, 2022
A-Diamond	Sue Diamond, Commissioner	San Francisco Planning Commission	Transcript	June 9, 2022
A-Diamond_2	Sue Diamond, Commissioner	San Francisco Planning Commission	Email	July 11, 2022
A-HPC	Not Specified	San Francisco Historic Preservation Commission	Letter	June 7, 2022
A-Imperial	Theresa Imperial, Commissioner	San Francisco Planning Commission	Transcript	June 9, 2022
A-Moore	Kathrin Moore, Commissioner	San Francisco Planning Commission	Transcript	June 9, 2022
A-Tanner	Rachael Tanner, Commissioner	San Francisco Planning Commission	Transcript	June 9, 2022
Organizations				
O-CCLT	Bruce Wolfe	Cares Community Land Trust	Transcript	June 9, 2022
O-CHA	Lori Brooke	Cow Hollow Association	Email with PDF Attachment	July 12, 2022
O-EJA	Francisco Da Costa	Environmental Justice Advocacy	Transcript	June 9, 2022
O-GGVNA	Phile Faroudja	Golden Gate Valley Neighborhood Association	Email	June 30, 2022

Commenter Code	Name of Person and Title (if applicable)	Agency/ Organization (if applicable)	Comment Format¹	Date²
O-JPIA	Owen Hart, President	Jordan Park Improvement Association	Email with Word Attachment	July 11, 2022
O-JTF	Emily Murase	Japantown Task Force	Email	June 21, 2022
O-LHIA	Kathy Devincenzi	Laurel Heights Improvement Association	Email with PDF Attachment	July 12, 2022
O-RDR	Don Misumi	Richmond District Rising	Transcript	June 9, 2022
O-REP	Joseph Smooke	Race & Equity in All Planning Coalition	Transcript	June 9, 2022
O-REP_2	Jeantelle Laberinto	Race & Equity in All Planning Coalition	Transcript	June 9, 2022
O-REP_3	Joseph Smooke	Race & Equity in All Planning Coalition	Email	July 12, 2022
O-SOMCAN	Angelica Cabande	South of Market Community Action Network	Transcript	June 9, 2022
O-SPEAK	Eileen Boken	Sunset-Parkside Education and Action Committee	Email	July 11, 2022
O-YCD	Zach Weisenburger	Young Community Developers	Transcript	June 9, 2022
Individuals				
I-Adam	Adam	Individual	Transcript	June 9, 2022
I-Arora	Ann Arora	Individual	Email	July 7, 2022
I-Ayers	Charles Ayers	Individual	Email	June 8, 2022
I-Bargar	Cliff Bargar	Individual	Email	June 8, 2022
I-Bash	Ty Bash	Individual	Email	April 21, 2022
I-Besmer	Jeremy Besmer	Individual	Email	June 8, 2022
I-Boken	Eileen Boken	Individual	Transcript	June 9, 2022
I-Boudreau	Sarah Boudreau	Individual	Email	June 8, 2022
I-Bratun-Glen	Zachary Bratun-Glennon	Individual	Email	July 12, 2022
I-Britamon ³	Jonathan Britamon	Individual	Transcript	June 9, 2022
I-Bunemann ³	Jonathan Bunemann	Individual	Email	June 7, 2022

Commenter Code	Name of Person and Title (if applicable)	Agency/ Organization (if applicable)	Comment Format¹	Date²
I-Burns	Linda and Tom Burns	Individual	Email	July 10, 2022
I-Chen	Michael Chen	Individual	Email	June 8, 2022
I-Chintala	George Chintala	Individual	Email	July 12, 2022
I-Chong,L	Linda Chong	Individual	Email	July 11, 2022
I-Chong,RB	Richard and Beverly Chong	Individual	Email	July 10, 2022
I-Conner	Scot Conner	Individual	Email	June 8, 2022
I-Cuddeback	Sam Cuddeback	Individual	Email	June 16, 2022
I-Damerdji	Salim Damerdji	Individual	Email	June 8, 2022
I-Day	Andrew Day	Individual	Email	June 9, 2022
I-DiMento	Joseph DiMento	Individual	Email	June 8, 2022
I-Ed	Ed	Individual	Email	June 10, 2022
I-Eisler,J	Jessica Eisler	Individual	Email	July 8, 2022
I-Eisler,M	Michael Eisler	Individual	Email	July 8, 2022
I-Elmendorf	Christopher Elmendorf	Individual	Email with PDF attachment	May 10, 2022
I-Esfandiari	Bobak Esfandiari	Individual	Email	June 8, 2022
I-Federman	Dan Federman	Individual	Email	June 8, 2022
I-Frankel	Will Frankel	Individual	Email	June 8, 2022
I-Fruchtman	Robert Fruchtman	Individual	Email	June 8, 2022
I-Fruchtman_2	Bob Fruchtman	Individual	Transcript	June 9, 2022
I-Gauss	Miriam Gauss	Individual	Email	June 19, 2022
I-Glick	Linda Glick	Individual	Email	July 11, 2022
I-Golden,A	Alexandra Golden	Individual	Email	July 12, 2022
I-Golden,J	Jonathan Golden	Individual	Email	July 12, 2022
I-Greenfield	Jason Greenfield	Individual	Email	July 12, 2022
I-Hart	Owen Hart	Individual	Email	July 10, 2022
I-Hestor	Sue Hestor	Individual	Transcript	June 9, 2022
I-Hong	Dennis Hong	Individual	Email	June 9, 2022
I-Hong_2	Dennis Hong	Individual	Email	July 11, 2022
I-Howell	Linda and Larry Howell	Individual	Email	July 10, 2022
I-Ivan	David Ivan	Individual	Email	June 9, 2022

Commenter Code	Name of Person and Title (if applicable)	Agency/ Organization (if applicable)	Comment Format¹	Date²
I-Jacobi	Mary Jacobi	Individual	Email	July 11, 2022
I-Johnson	Corey Johnson	Individual	Email	June 8, 2022
I-Kanter	David Kanter	Individual	Email	June 8, 2022
I-Kaplan	Ira Kaplan	Individual	Email	June 8, 2022
I-Kattouw	Roan Kattouw	Individual	Email	June 8, 2022
I-Keller	Nathaniel Keller	Individual	Email	June 16, 2022
I-Kind	Elizabeth A. Kind	Individual	Email	July 11, 2022
I-Klenk	Matthew Klenk	Individual	Email	June 8, 2022
I-Kline	Laura Kline	Individual	Email	June 17, 2022
I-Kline_2	Laura Kline	Individual	Email	June 17, 2022
I-Lee	Laurance Lee	Individual	Email	June 8, 2022
I-Madsen	Elena Madsen	Individual	Email	July 8, 2022
I-Mahoney	David Mahoney	Individual	Email	June 18, 2022
I-Marks	Laurie Marks	Individual	Email	June 16, 2022
I-Marks_2	Laurie Marks	Individual	Email	July 8, 2022
I-Martin	Richard Martin	Individual	Email	July 7, 2022
I-Marzo	Steve Marzo	Individual	Email	June 8, 2022
I-Massenburg	Mary Ann Massenburg and Robert D. Purcell	Individual	Email	July 12, 2022
I-Mathews	Linda Mathews	Individual	Email	July 11, 2022
I-Miller	Laurie Miller	Individual	Email	July 12, 2022
I-Mogannam	Mary Mogannam	Individual	Email	July 11, 2022
I-Munoz	Martin Munoz	Individual	Email	June 8, 2022
I-Nakahara	Glynis Nakahara	Individual	Email	June 9, 2022
I-Nakahara_2	Glynis Nakahara	Individual	Transcript	June 9, 2022
I-O'Neill	Shannon and Shawn O'Neill	Individual	Email	July 10, 2022
I-Paul,J	Julie Paul	Individual	Email	June 21, 2022
I-Paul,J_2	Julie Paul	Individual	Email	July 5, 2022
I-Paul,J_3	Julie Paul	Individual	Email	July 9, 2022
I-Paul,M	Mike Paul	Individual	Email	July 5, 2022
I-Paul,M_2	Mike Paul	Individual	Email	July 10, 2022

Commenter Code	Name of Person and Title (if applicable)	Agency/ Organization (if applicable)	Comment Format¹	Date²
I-Perla	Jessica Perla	Individual	Email	June 8, 2022
I-Powell	Brandon Powell	Individual	Email	June 8, 2022
I-Pressman	Lauren Pressman Greenfield	Individual	Email	July 10, 2022
I-Randecker	Stacey Randecker	Individual	Email	June 9, 2022
I-Resnansky	Kristin Resnansky	Individual	Email	June 20, 2022
I-Robbins	Sallie Robbins	Individual	Email	July 2, 2022
I-Robbins_2	Sallie Robbins	Individual	Email	July 7, 2022
I-Roberson	Kelly Roberson	Individual	Email	May 7, 2022
I-Roberson_2	Kelly Roberson	Individual	Email	July 8, 2022
I-Roberson_3	Kelly Roberson	Individual	Email	July 11, 2022
I-Rogers	Sarah Rogers	Individual	Email	June 8, 2022
I-Rose	Jeremy Rose	Individual	Email	June 8, 2022
I-Russell	Kenneth Russell	Individual	Email	June 8, 2022
I-Schember	Christopher Schember	Individual	Email	June 22, 2022
I-Schuttish	Georgia Schuttish	Individual	Transcript	June 9, 2022
I-Schuttish_2	Georgia Schuttish	Individual	Email	July 11, 2022
I-Schuttish_3	Georgia Schuttish	Individual	Email	July 13, 2022*
I-Schwartz	Elliot Schwartz	Individual	Email	June 8, 2022
I-Simmons	Scott Simmons	Individual	Email	June 8, 2022
I-Storey	Meg Storey	Individual	Email	June 17, 2022
I-Subin	Zach Subin	Individual	Email	June 8, 2022
I-Thalheimer	Richard Thalheimer	Individual	Email	August 11, 2022*
I-Titus	Alan Titus	Individual	Email	July 11, 2022
I-Truong	Justin Truong	Individual	Email	June 28, 2022
I-Tyburski	Jonathan Tyburski	Individual	Email	June 9, 2022
I-Underwood	Victoria Underwood	Individual	Email with PDF attachment	July 7, 2022
I-Underwood_2	Victoria Underwood	Individual	Email	July 8, 2022
I-Vijayaraghavan	Srinivasan Vijayaraghavan	Individual	Email	June 8, 2022
I-Watson	David Watson	Individual	Email	June 8, 2022

Commenter Code	Name of Person and Title (if applicable)	Agency/ Organization (if applicable)	Comment Format¹	Date²
I-Webb	James Webb	Individual	Email	June 8, 2022
I-Weinberg	Barbara Weinberg	Individual	Email	July 10, 2022
I-Welborn	Tess Welborn	Individual	Transcript	June 9, 2022
I-Whitfield	Charles Whitfield	Individual	Email	June 8, 2022
I-Winkler	Calla Winkler	Individual	Email	July 10, 2020
I-Wuerfel	Nancy Wuerfel	Individual	Email	July 26, 2022 [*]
I-Yamagami	Dick & Jan Yamagami	Individual	Email	June 17, 2022
I-Yovanopoulos	Anastasia Yovanopoulos	Individual	Transcript	June 9, 2022

Notes:

¹ Transcript: comments made during draft EIR public hearing at the planning commission.

² Comments submitted after July 12, 2022, the closing date of the public comment period, are highlighted by an asterisk (*). Late comments are not required to be included in this RTC document, but the department has chosen to include them and they have been responded to as appropriate in RTC Chapter 4, Comments and Responses.

³ I-Britamon and I-Bunemann may be the same commenter.

From: [White, Elizabeth \(CPC\)](#)
To: [Luo, Yunsheng@DOT](#)
Cc: [CPC.HousingElementUpdateEIR](#)
Subject: RE: comments for San Francisco Housing Element 2022 Update, DEIR
Date: Monday, May 16, 2022 8:56:00 AM

A-Caltrans

Hi Yunsheng,
I'm acknowledging receipt of your comments.
Thank you!
Liz

From: Luo, Yunsheng@DOT <Yunsheng.Luo@dot.ca.gov>
Sent: Friday, May 13, 2022 11:27 AM
To: White, Elizabeth (CPC) <elizabeth.white@sfgov.org>
Subject: comments for San Francisco Housing Element 2022 Update, DEIR

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

Hi Elizabeth,
Thank you for the opportunity to review the DEIR for the San Francisco Housing Element 2022 Update. Below please see our comments for this project. Please reach out to me if you have any questions. Thank you and have a great weekend!

Comments

1 ■ The Caltrans Office of System and Regional Planning applauds the project efforts to limit Vehicle Miles Traveled (VMT) wherever possible, and implement travel time measures to reduce transit delay caused by project impacts. The location choices for new housing developments in the coming decades should give preference to proximity to transit options so as not to induce more automobile travel and VMT in an already congested urban environment.

■ Best,

Yunsheng Luo
Associate Transportation Planner
Local Development Review (LDR), Caltrans D4
Work Cell: 510-496-9285

For early coordination and project circulation, please reach out to LDR-D4@dot.ca.gov

From: [White, Elizabeth \(CPC\)](#)
To: [CPC.HousingElementUpdateEIR](#)
Subject: FW: Additional Comments from Commissioner Diamond on the Housing Element DEIR
Date: Monday, July 11, 2022 7:20:48 PM

From: Diamond, Susan (CPC) <sue.diamond@sfgov.org>

Sent: Monday, July 11, 2022 7:01 PM

To: White, Elizabeth (CPC) <elizabeth.white@sfgov.org>; Hillis, Rich (CPC) <rich.hillis@sfgov.org>

Cc: Tanner, Rachael (CPC) <rachael.tanner@sfgov.org>; Moore, Kathrin (CPC)

<kathrin.moore@sfgov.org>; Fung, Frank (CPC) <frank.fung@sfgov.org>; Koppel, Joel (CPC)

<joel.koppel@sfgov.org>; Imperial, Theresa (CPC) <theresa.imperial@sfgov.org>; Ruiz, Gabriella

(CPC) <gabriella.ruiz@sfgov.org>; Diamond, Susan (CPC) <sue.diamond@sfgov.org>

Subject: Additional Comments from Commissioner Diamond on the Housing Element DEIR

Thank you for the opportunity to comment on the Housing Element DEIR. In addition to the comments which I made at the 6/9/22 Planning Commission hearing (summarized at the end of this email), I also wish to make the following comments:


1. I believe the FEIR must include more than one possible future distribution of the proposed height and density in order to better equip the City to use this EIR to cover other height and density distributions that may ultimately be adopted as part of any future planning code amendments to implement the Housing Element. By including only one possible solution, the DEIR appears to be guiding decisionmakers toward a specific outcome on the height/density distribution for the potential eventual planning code amendments without there having been any public hearings on what that distribution should be. At a minimum, the DEIR should include another distribution with a more equitable allocation of height across all of the west side with everyone on the west side bearing their fair share of the height increase without the imposition of 85' or 65' on any residential side street.
2. I read with distress the many announcements of companies leaving some or all of their office space in the downtown and Mid-Market areas. Not only is the loss of the economic engine worrisome, but it also means loss of many of the smaller retailers dependent on office space use. I think we should acknowledge that the dramatic decline in the use of downtown office space is not simply a short term pandemic phenomenon but has resulted in a significant change in philosophy about remote and hybrid work. As a result, I think we should be studying right now what it would realistically take to convert some of the underutilized downtown office space into other uses such as housing, so that we are creating a vibrant mixed use downtown district that supports retail, office, housing and tourism. The Housing Element update was started before the remote/hybrid work phenomenon occurred, and is focused on the west side as the place where the bulk of the new housing should be built. However, as discussed in the DEIR, there may be insufficient transit and wastewater capacity on the west side and it may be that the City is proposing more housing on the west side than is feasible. While moving residential density to the west side is important, I think we should also be exploring as part of the Housing Element how we can incentivize the conversion of some of the underutilized perhaps older office buildings downtown to residential use.
3. One of the most wonderful aspects of residential life in San Francisco is its plethora of distinct neighborhoods. Residents take pride in the architecture, neighborhood centers,

streetscapes, culture, history, individual character etc of their neighborhoods, some of which are historic or historic-eligible districts. As a result, I believe that as the City takes action to increase the density on the west side it needs to be mindful to do so in a way that does not undermine or destroy the unique identifying characteristics of these neighborhoods and ends up with bland nondescript neighborhoods devoid of the current points of pride. Thus, while the buildings that front on commercial streets may be able to support heights of 85' or 65', I do not believe that the residential side streets should be increased to 85' or even 65'. Further, at such time that the City undertakes the block by block analysis that is a necessary precursor to any rezoning and height increase on the west side to implement Housing Element policies, it needs to ensure that any such rezoning and height increases:

- a. Do not lead to actions that divide established neighborhoods; and
- b. Do not interfere with, or affect the integrity of, the fabric, scale, character or consistency of, any historic or historic-eligible districts; and
- c. Do not significantly undermine the unique points of identity and individual character of established neighborhoods. By way of example (any many other examples could be provided for this last point "c", the City should:
 - i. consider whether it is important to the character of an existing neighborhood to retain a single height standard (even if it is a little higher than current height standards) rather than applying varying new heights standards within identifiable neighborhoods that are currently characterized by a single height standard; and
 - ii. not apply height standards that result in significant additional shadowing of playgrounds, school yards, parks and neighborhood gathering spaces at times when they are well-used; and
 - iii. require setbacks/stepbacks to accompany height increases to ensure the maintenance of current street walls where the street walls help define the character of the neighborhood.

Summary of Comments Made during 6/9/22 Planning Commission DEIR hearing:

1. The EIR states in multiple places that the proposed action represents one possible distribution of future housing development growth and that we may end up with zoning changes that reflect somewhat different zoning/height patterns than shown in the proposed action. While several major commercial corridors are appropriately raised to 85', as I have previously stated, I disagree with that policy of increasing the residential side streets to 85' which is roughly equivalent to adding 4-6 stories of height on top of the existing 2-3 story housing stock on the side streets. It makes sense to me to increase the height limits on the side streets to 55' or in some cases 65', but I think raising the limit to 85' on the side streets is unnecessarily disruptive and too massive a shift in character. Consequently, I would like to make sure the EIR is broad enough to cover proposed rezonings and height changes that maintain or increase the 85' along the commercial stripes but step down the proposed 85' zone on these residential side streets to 65' or 55'. If necessary, the units lost by that height decrease could be moved elsewhere on the west side by, for example, increasing the commercial corridors to higher than 85', increasing other commercial corridors to 85' that are now only at 65' or increasing side streets heights that are at 40' to 55' or at 55' to 65'.

- 
- 5 2. None of the 10 visual simulations really show what development would look like with the residential side street height increases – whether it be 55, 65 or 85'. I think it would be helpful to add visual simulation to better show that change.
 - 6 3. While it is still soon to do anything other than speculate, at what point would we recognize that we may not need as much office space downtown as planned for and some of that space may be developed or redeveloped with residential space. How, if and when might that fundamental shift change our thoughts about the amount of residential development capacity we should plan for on the west side?
 - 7 4. As we increase density on the west side we will be losing backyards, increasing shading on school yards and parks while at the same time increasing demand for recreational facilities such as playgrounds and athletic fields. Page 4.1-108 says that although the recreational facilities in the west are larger and more abundant, the increase in demand as a result of the future development consistent with the housing element update would exceed the existing capacity of these recreational facilities. The DEIR then states that only 6 of the 66 new recreational facilities are on the west side. Even though the DEIR cites some broad policies about Park and Rec maintaining parks to reduce physical degradation, I am having a hard time reconciling the conclusion of no physical degradation in light of the intense increase in use from this proposed action when only 6 of 66 new parks and facilities are planned for the west side. I would like to see more information provided in support of the DEIR's conclusion.
 - 8 5. The focus of this EIR is on the Housing Element but how do we ensure that the infrastructure needed to service the additional housing on the west side keeps apace – transit and wastewater capacity upgrades in particular. What coordination happens among the city departments to ensure the timeline for studying, funding and developing the infrastructure keeps up with the development of housing?
 - 9 6. Page 6-43 states that the Preservation Alternative would revise housing element policies to further promote future development that would not materially impair the significance of built environment historic resources and historic districts. Please confirm that such policies apply not just to the Buena Vista, Ingleside, Marina and Western Addition neighborhoods, but to all areas of the westside proposed for future housing units where there are built environment historic resources and historic districts.

Sue Diamond

San Francisco Planning Commissioner

sue.diamond@sfgov.org



June 7, 2022

Ms. Lisa Gibson
Environmental Review Officer
San Francisco Planning Department
49 South Van Ness Avenue, Suite 1400
San Francisco, CA 94103

Dear Ms. Gibson,

On June 1, 2022, the Historic Preservation Commission (HPC) held a public hearing for the Commissioners to hear public testimony and to provide comments to the San Francisco Planning Department on the Draft Environmental Impact Report (DEIR) for the San Francisco Housing Element 2022 Update of the San Francisco General Plan (2019-016230ENV).

After discussion, the HPC arrived at the comments below on the DEIR:

- 1 • The HPC found the analysis of historic resources in the DEIR to be adequate and accurate. Commissioners commented that identification of historic resources and the historic background analysis and text is well-developed, compelling, and comprehensive. The proposed historic resource mitigations measures were extensive. Overall, the HPC found the analysis of historic resources to be thoughtful and nuanced.
- 2 • The HPC found the preservation alternative to be adequate. Commissioners approved of the preservation alternative including the same number of housing units as the proposed action while reducing impacts on built environment historic resources and generally having the same or less impacts than the proposed action.
- 3 • Commissioners Nageswaran and Black found the tables in cultural resource section to be helpful and informative, especially Table 4.2-8: Summary of Historic Resource Impacts from Future Development Consistent with the Housing Element Update.
- 4 • Commissioner Nageswaran asked for further clarity of the anticipated project-level impacts shown in Table 4.2.7: Summary of Housing Project Types Anticipated for Future Development Consistent with Housing Element Update in relationship to the housing project types shown in this table and asked for further clarity of the relationship of the project-level impacts in this table to the mitigation measures.
- 5 • In regard to built-environment historic resource mitigations measures, Commissioner Nageswaran asked if historic resource guidelines for new development are included in the proposed mitigation measures.
- 6 • Commissioners Black and Wright requested further clarification on the relationship of built environment historic resource review of future development projects under the proposed action with the findings of the citywide survey (SF Survey).

- 7 ■
- 8 ■
- Commissioner Wright requested further clarification about how future development projects would be reviewed under the preservation alternative or another alternative, if selected, in comparison to the proposed action, and if the built environment historic resource mitigation measures would be applicable to future development projects if the preservation alternative was selected.

The HPC appreciates the opportunity to participate in review of this environmental document.

From: [Lori Brooke](#)
To: [CPC.HousingElementUpdateEIR](#)
Cc: [Stefani, Catherine \(BOS\)](#); [Mullan, Andrew \(BOS\)](#); [Donovan, Dominica \(BOS\)](#); [David Bancroft](#); [Cynthia Gissler](#); [Jan Diamond](#); [Claire Mills](#); [Barbara Heffernan](#); [Anne Boswell Bertrand](#); [Veronica Taisch](#); [Don A. Emmons](#); [Lori Brooke](#)
Subject: Cow Hollow Association Response to Housing Element EIR
Date: Tuesday, July 12, 2022 9:51:19 AM
Attachments: [CHA Comments on Housing Element July 12, 2022.pdf](#)

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

Elizabeth,

Thank you for all your efforts in coordinating the Housing Element EIR.

Please see the attached letter from the Cow Hollow Association with our comments.

If you have any questions, feel free to reach out to Barbara Heffernan at barbarajheffernan@gmail.com.

Best,
Lori Brooke
President, Cow Hollow Association



July 12, 2022

Elizabeth White, EIR Coordinator
San Francisco Planning Department
49 South Van Ness Avenue, Suite 1400
San Francisco, CA 94103

Dear Elizabeth,

The Cow Hollow Association (CHA) appreciates the work you have invested in the Housing Element documents. We are a non-profit neighborhood organization that represents the interests of over 1,100 households bounded by Greenwich Street, Pierce Street, Pacific Avenue and Lyon Street, and including the north-south streets between Greenwich and Lombard.

The purpose of this letter is to provide feedback and our recommendations on the Housing Element document.

1. CHA supports your goals to provide affordable housing in San Francisco utilizing Land Use Density and Distribution. In your document, this development would occur in all areas of the city.
2. Our concerns center around increasing height limits on Lombard Street and Union Street in District 2. We support increased density without increasing height limits beyond 40 feet.

What makes the Marina neighborhoods beautiful is the topography which allows for shared vistas and shared open space from Pacific Heights down to Cow Hollow and out to the water's edge along the Marina Green. CHA carefully protects height limits within



2
Cont'd
3

our boundaries to stay within 40 feet. As a result, visitors and residents driving into the city from the Golden Gate Bridge view the vistas of the neighborhoods and the beautiful topography. Increasing the height to 65 feet along these two streets would create a dark canyon of high buildings and block the light and air for residents and visitors alike.

4

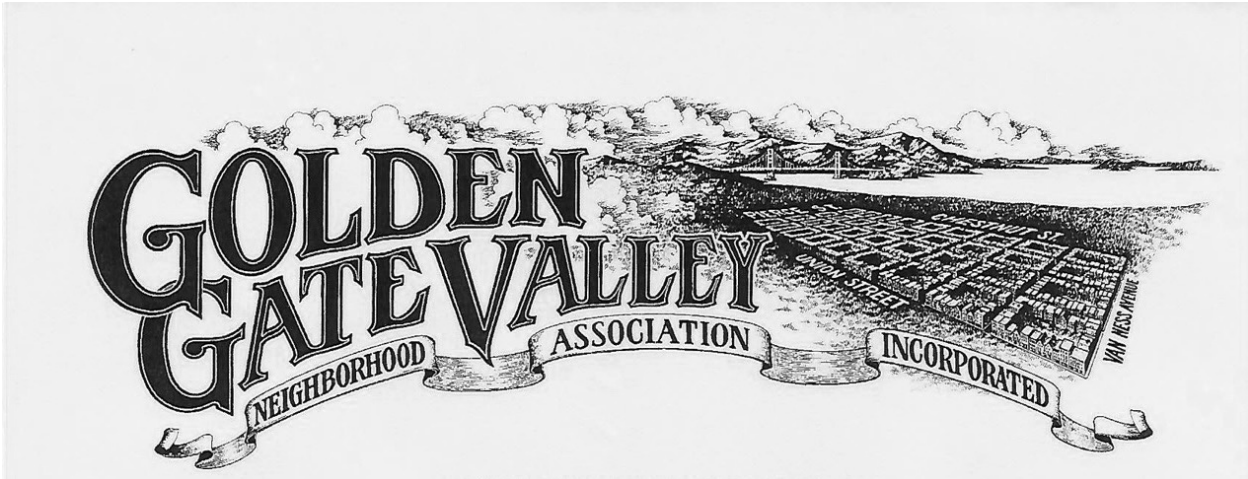
There is potential to remove older hotels and renovate vacant single story shops on Lombard Street to add dense, multi-family affordable housing. In honoring the Cow Hollow Neighborhood Design Guidelines' height limits, the Cow Hollow Board will work diligently with nearby neighborhood boards to support adding dense multi-family and affordable housing in the Marina neighborhoods. As importantly, we believe the Planning Department should not change long established zoning limits before it first fully understands and considers the amount of potential housing through current usable vacancies, entitled projects yet to be built, and unbuilt capacity that is within current zoning laws.

We appreciate you taking the time to consult with the neighborhood associations to ensure that our concerns are addressed. Please feel free to contact Barbara Heffernan (barbarajheffernan@gmail.com) from the CHA Zoning Committee if you have any questions or need further information.

Sincerely,

Lori Brooke
President, Cow Hollow Association

cc:
CHA Board
District 2 Supervisor, Catherine Stefani



P.O. Box 29086
 Presidio Station
 San Francisco, CA 94129

June 30, 2022

Re: 2022 Housing Element

Dear San Francisco Planning Department:

Golden Gate Valley Neighborhood Association has serious concerns about the 2022 Housing Element, as expressed in the recent Draft Environmental Impact Report.

On page 2-26 of the Report, eleven streets are candidates for development. Two of them in our neighborhood, Union and Lombard, should not be on that list. Criteria for inclusion according to the report are a well resourced area and a transit corridor. These do not apply. Union street has a bus line and retail shops, but so do a hundred other streets in San Francisco. Beyond buses, it does not have a train, streetcar or other transportation and does not qualify as a transit corridor. And it is not more resourced than other commercial avenues. This is the same with Lombard. These streets need to be removed from the list.

Page 2-24 of the report states, "... a foreseeable change in land use could include... increasing allowable height limits along existing and projected rapid network transit corridors.." Increasing height limits along Union and Lombard would be a disaster. It would probably result in 95% of buildings with one height limit, with a few conforming to a second height limit and sticking out. The outcome would be an unattractive, messy pastiche. In addition, this might open the door to demolishing many older buildings. Part of the charm of a street like Union, though, are the distinctive Victorians which house various shops and boutiques. Our old buildings are a valuable resource (and major tourist attraction) and the city needs to hold onto them.

1
Cont'd

We also noticed that four of the eleven streets chosen for development — Van Ness, Lombard, Union and California — are in District 2. This is close to 40% of the total and seems a disproportionate concentration in one area, especially considering there are eleven districts throughout the city.

The pandemic has also changed things. Population growth in the city has stalled, and even started to decline, and the weekday working population is much lower. A visit to the Financial District during the week reveals only partially occupied offices, and many work from home. Overall, the world is very different compared to 2019. Given all this uncertainty, it is a gamble that new housing will even be filled in the next few years.

California wants many new housing units, but it all feels a bit arbitrary. Those making the decisions do not reside here, don't know what it is like to live or work here, and yet set guidelines. This will alter the quality of life. Citizens and city planners have a far better comprehension of what can work. The current state targets are unreasonable, and we encourage the Planning Department to only incorporate only what is deemed sensible.

Many thanks for your kind attention.

Sincerely yours,

Phil Faroudja

President, GGVNA

Dear Director of Planning Hillis and Planning Commission Members:

I am writing to express my objection to the proposed revision to the building height limitation upward to 85 feet from the existing limit of 40 feet for Jordan Park. I was recently made aware of some proposed Height Limit/zoning changes that are incorporated in the "Draft Environmental Impact Report ("EIR") Volume I for the San Francisco Housing Element 2022 Update" of the General Plan. Buried on page 2-25 (Fig. 2-7) within the 600+ page report is a map outlining proposed changes to the building height limitations for San Francisco's various neighborhoods. Upon reviewing this graphic, I was shocked to see proposed changes that would increase the current building height restriction from 40 feet to 85 feet for much of my neighborhood, Jordan Park, and several others! It appears that the area delineated by Clement, Euclid and Pine Streets to the north; Park Presidio to the west; Anza to the South; and Fillmore to the east is being targeted to assume a disproportionate percentage of the 50,000 dwelling units ("D.U.s") that the city is seeking to add by 2050. Certain other zones within or adjacent to our neighborhoods are targeted for even more dramatic building height limits of 200 feet (the former Lucky Penny site, for example). So, the character of Jordan Park, Laurel Heights, Anza Vista, Japantown and the Inner Richmond all could be dramatically and adversely impacted under this plan, as it could basically turn our neighborhoods into a West Side version of Mission Bay.

- One of the guiding principles behind the housing element is that the development of new housing should be balanced fairly given that the west side has not absorbed much of the high density new residential development in the past. Based upon Fig. 2-7, it appears that the area delineated by Clement, Euclid and Pine Streets to the north; Park Presidio to the west; Anza to the South; and Fillmore to the east (the "Delineated Area") is being targeted to assume a disproportionate percentage of the 50,000 dwelling units ("D.U.s") that the city is seeking to add by 2050. However, while several other neighborhoods including the Sunset, Noe Valley, Pacific Heights, Presidio Heights, Sea Cliff and the Marina would see more density, they would not be subjected to similar height increases under the proposed plan. Therefore, this plan clearly fails to meet its stated objective and standards of "fairness."
- Certain zones within the Delineated Area are targeted for even more dramatic building height limits of 200 feet (the former Lucky Penny site, for example) and Geary, as a commercial street and major east/west throughfare, is targeted for increased building height limits, which is understandable. However, allowing the height limitation increases to bleed into the neighboring many residential side streets, like Jordan, Commonwealth, Palm and Parker, is not. The Jordan Park Historic District is eligible for the California Register of Historical Resources under "Criterion C (architecture)." The proposed height increase would destroy the existing fabric, scale and character of the neighborhood that qualifies it for consideration as a "Historical Resource."
- From more technical viewpoint, as it currently exists, the West Side does not have the infrastructure (e.g. roads, parking, facilities, wastewater capacity, etc.) to bear the burden of the proposed development. For example, while the city plans to add 66 new recreational facilities by 2050, and our neighborhoods are currently well served in this regard, only six of the 66 planned new facilities are to be located in the West Side of the City. Thus, the West Side will be underserved in the future should this plan be realized.

120 Jordan Avenue
San Francisco, CA 94118

4

- The proposed changes would irreparably divide neighborhoods in direct contradiction to one of the stated objectives of the Housing Element. In the section "Impacts and Mitigation Measures" (4.1-19 of the EIR Vol. I). Impact LU-1 dictates that "the proposed actions would not physically divide an established neighborhood." Specifically, this section states that "the proposed action would not directly or indirectly create any new physical barriers within the city that would divide established neighborhoods." Permitting buildings to be constructed to a height more than twice the height of the existing homes would *directly* and *indirectly* divide Jordan Park! This change would destroy the character of the neighborhood, eliminate vistas into and out of the neighborhood and materially reduce the natural sunlight in the neighborhood! All these impacts are contrary to the stated objectives of the EIR.

5

Our concern is that this proposal will receive little scrutiny and be rubber stamped for further consideration, as it appears that few are aware of this plan (I certainly wasn't). I have my concerns with the Laurel Heights Improvement Association who indicated that they were previously unaware of this proposal either. I also have shared my concerns with Supervisor Stefani's office. What is equally disconcerting is that until last week's video conference, there has been virtually no discussion about this change with the impacted communities. In a city that claims to value transparency in its government, the fact that this dramatic change is represented solely in a graphic with no other mention in the document is truly appalling.

6

Jordan Park Improvement Association is strongly against the proposed increase in height limit included in this proposal. We greatly appreciate the Planning Commission extending the comment period by three weeks, to July 12th. We request that the Planning Commission consider/develop other alternatives and scenarios for how the planned growth and development can be more evenly and equitably distributed throughout the city. We also suggest that the Planning Commission be far more proactive in reaching out to the impacted neighborhoods so that they have the opportunity to have their concerns heard. Regardless of where the Commission seeks to increase the housing stock in the city, no residential side streets should have height limitations as great as 85 feet. This proposed change will irreparably damage the urban fabric of our city and the character of our neighborhoods.

Sincerely,

Owen L. Hart
President
Jordan Park Improvement Association
San Francisco, CA 94118

From: [Emily Murase](#)
To: [CPC.HousingElementUpdateEIR](#); [Banales, Julian \(CPC\)](#); [Caltagirone, Shelley \(CPC\)](#); [Ionin, Jonas \(CPC\)](#); [Hillis, Rich \(CPC\)](#)
Cc: [Preston, Dean \(BOS\)](#); [Smeallie, Kyle \(BOS\)](#); [Glynis Nakahara](#); [Jeremy Chan](#); [Lori Yamauchi](#); [Lauren Nosaka](#)
Subject: [Japantown Task Force] Comments on the DEIR
Date: Tuesday, June 21, 2022 4:31:37 PM
Attachments: [22.6.20 JTF Housing Element DEIR Comments to Planning Commission.pdf](#)

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

To Elizabeth White et. al.,

On behalf of the Japantown Task Force Board of Directors, I am forwarding to your attention detailed comments on the Housing Element Draft Environmental Impact Reports. We look forward to working closely with Planning Commissioners and Planning Department staff on this important work. Thank you for your valuable assistance and consideration.

Emily

Emily M. Murase, PhD
ムラセ エミリー
Executive Director
Japantown Task Force, Inc.
[1765 Sutter Street, 3rd Floor](#)
[San Francisco, CA 94115](#)
www.japantowntaskforce.org
415.346.1239 (Office)
415.297.3975 (Cell)

Rachael Tanner
President
San Francisco Planning Commission
Via email

June 21, 2022

Dear President Tanner:

The Japantown Task Force (JTF) has prioritized engaging in the public process to develop San Francisco's 2022 Housing Element Update (SFHE) and we thank the Planning Department, and the Housing Element Update team in particular, for connecting with and listening to community stakeholders in good faith.

Overview

A subcommittee of the JTF Land Use and Transportation Committee conducted a review of the Draft Environmental Impact Report (DEIR) and shared its findings with the full Land Use Committee, the Ad-Hoc Technical Committee on the Japan Center Malls, and the JTF Board of Directors. We are concerned that the proposals it encompasses could exert extreme development pressure and harmful impacts on Japantown.

As you know, Japantown is one of only three remaining Japantowns in the United States and became the City's first Cultural District in 2013, a designation designed to preserve and stabilize at-risk areas of unique cultural heritage. It is also a community that has been eviscerated by racist government policy, most recently through City sanctioned urban renewal that reduced Japantown from 40 blocks to its current core of 6 city blocks, displacing hundreds of families and businesses in the process.

We support the need of every neighborhood – including Japantown – to share the responsibility of addressing the very real housing crises. We also support creating more opportunities for the Japanese American community to return to and reside in Japantown after being forcibly removed and displaced, both by the race-based and wholly unwarranted wartime incarceration and the City's redevelopment programs. **However, we think the DEIR contains proposals that unfairly overburden Japantown.** JTF would like to note the following of particular concern:

- 1) **Dramatic Increases to Height Limits and Lifting of Density Limits** – Figure 2-7 (Volume 1, page 185) shows an almost five-fold increase in height limits along Geary Boulevard between Laguna and Fillmore Streets, from the current 50' limit to 240'. The DEIR also shows a 70% increase to existing height limits one block north of Post Street, between Laguna and Webster Streets, from the current 50' limit and lifts housing density limits for all of these blocks.

1
Cont'd

The combination of these upzoning changes could result in **more than doubling** the housing supply in Japantown by 2050 – an increase of 2,700 more housing units by 2050 – representing a **108% increase** above the 2,500 units as of 2021 and allowing 400 more housing units by 2050 than the 2014 Housing Element. These changes could lead to significant impacts on 1) cultural and historic resources, 2) transportation and circulation, 3) shadow, and possibly 4) wind. And yet, there are NO analyses of these potential impacts in the DEIR.

It is important to note that, in the March 2022 SF Housing Element draft Sites Inventory and Rezoning Program Report, potential height limit increases for Japantown were between 55' and 85', NOT 240' and 85'. ***There was no communication with Japantown on showing these significant changes in the DEIR before its publication.***

2

- 2) **Singled out for Significant Growth** – Of the three Cultural Districts impacted by the DEIR (the others being the Castro and Sunset Chinese Cultural Districts), Japantown is the only community that is expected to absorb massive growth.

3

- 3) **Elimination of Community Engagement** – Japantown is designated as a potential Housing Sustainability District which could result in ministerial approvals for projects that meet the 20% affordable unit benchmarks. This would presumably supplant any community engagement for potentially significant development and impacts, stripping the community of any self-determination.

4

At the same time, the Housing Element includes policies that seek to redress harm to the Japanese American community caused by past discriminatory government actions. Our previous comment letter expressed our recognition and support for these policies. However, the above proposals in the DEIR are in direct conflict with the equity-centered values of the Housing Element Update.

5

Furthermore, the mitigation measures included in the DEIR are not adequate to address the potential impact of the significant changes shown in the report. **Such dramatic changes, as noted above, warrant further impact analyses. This is the basis of the following comments, recommendations, and requests for clarifications.**

Comments/Request for Clarification/Recommendations

6

1. How were the increased building heights and housing units for Japantown determined? What unit size(s) were assumed?

7

2. How would the Housing Sustainability District considered for Japantown be applied to future housing development? Would the 20% affordability requirement be applied to NEW housing development? The proposed 20% seems to be too low, especially given

7
Cont'd

the disproportionate impacts on Japantown, the forced removal of Japanese Americans from Japantown, and the subsequent loss of generational wealth resulting from displacement caused by governmental actions.

3. The DEIR states that the increased height limits and density in Japantown will lead to development pressure which will result in a greater probability that historic buildings in Japantown may be altered, demolished, relocated, and/or added to vertically or horizontally. Yet, the SFHE Update includes policies that seek to address harm to American Indian, Black, *Japanese*, Filipino and other communities brought by past discriminatory government actions. The Historic Preservation Commission approved two resolutions (Resolutions 0746 and 1127) that sought redress of such harms by calling on the Planning Department to develop proactive strategies to address structural and institutional racism, including improving efforts to collaborate with community members to identify and safeguard aspects of tangible and intangible heritage associated with marginalized racial and social groups, including Asian and Pacific Islander communities. This would also involve considering EIR alternatives for building projects that would produce significant impacts on historic resources.
4. There are myriad cultural assets and anchors in Japantown that have been carefully documented (i.e. Japantown Historic Context Statement, the 2013 Japantown Cultural Heritage Economic Sustainability Strategy or JCHESS). Although 72% of Japantown parcels lie within the City's first Cultural District, the DEIR notes that 73% of Japantown's historic aged parcels have not yet been evaluated for their historic significance. Yet, without evaluation, the DEIR states that only 4% of Japantown's Cultural District are likely to be historic resources. It is imperative that the evaluation of historic aged parcels in Japantown for their historic significance be completed before housing projects are considered. The impacts on Japantown's historic resources are not limited to individual buildings and sites; they extend to the entire cultural district's tangible and intangible historic resources. Therefore, historic buildings and other spaces should be preserved and not lost or adversely changed. Such buildings should NOT be demolished or changed in such ways that would be incompatible with the existing historic character of Japantown.
5. The DEIR proposes mitigation measures to address adverse impacts on historic resources. They do not go far enough to uphold the Historic Preservation Commission's Resolutions 0746 and 1127 to remedy past injustices. How will the redress policies and affordability requirements protect Japantown from the impacts of the significant increase in building heights and densities on its historic resources and cultural district?
6. The City should take a very rigorous and diligent approach with property owners/developers who want to change Japantown's historic and cultural assets. The community should be informed and involved early in the planning and design process, so that important historic and cultural assets in Japantown be preserved for future generations. Property owners/developers should work together with the community on

9

- 9
Cont'd
- height, density, location, as well as air quality, noise, vibration, water, power, and health impacts on the community.
- 10
7. The City must require that current residents of buildings affected by proposed housing projects should not be displaced and be allowed to safely relocate during construction and be guaranteed housing in the proposed project upon completion at the same rent.
- 11
8. The City should require that individual housing projects in Japantown incorporate design features that would ensure that the safety of pedestrians, bicyclists and drivers are protected.
- 12
9. The City should consider the overall future parking demand in Japantown resulting from the significant increase in housing proposed under the SFHE Update policies, when evaluating the parking demand of individual building projects and their transportation impacts, as well as when considering changes to the Japantown garage. Given the importance of the retail and cultural spaces in Japantown, and the need to accommodate parking for visitors from across the City and Bay Area region, it is imperative that the Japantown garage supply NOT be decreased and be sized to adequately meet the future parking demand of residents, workers, and visitors to Japantown.
- 13
10. The DEIR should provide more comprehensive analyses of shadow impacts in areas most impacted by the SFHE Update policies, such as Japantown. Notably, the current DEIR does NOT include a shadow analysis of the City-owned Peace Plaza, historically significant open space dedicated to the cultural life of Japantown. In addition to analyzing impacts on publicly-owned parks and open spaces, the DEIR should evaluate the impacts of taller buildings on privately owned public open spaces and overall access to sun within buildings such as in common and recreational spaces, as they become more essential to the quality of life with greater housing and population density.
- 14
11. The City should consider requiring integration of common recreational/open spaces as part of new developments that increase housing density significantly. For example, if the Japan Center Malls were to be replaced with tall dense housing and retail space, there could be rooftop or mid-section/terraced open green spaces that provide access to fresh air, daylight, and nature.
- 15
12. Given the high concentration of seniors in Japantown, consideration should be given to ensuring that access to sun, air and light is maximized, given that seniors are more impacted by building shadows due to their limited mobility.
- 16
13. The DEIR should provide wind analyses of taller buildings in Japantown, and that stronger mitigation measures be proposed. The cumulative wind impacts of taller buildings on the small Japantown footprint must be evaluated in the DEIR, and particularly, the relative wind impacts as experienced by seniors and children. Further,

16
Cont'd

17

the wind impacts of individual building projects should be evaluated and designed to avoid Significant wind impacts generated by taller buildings.

14. The DEIR states that the City will acquire and develop more parks and open space, as well as public services facilities, such as fire stations, police stations, schools and libraries, to meet the increased demand. There is no detail in the DEIR about where such facilities would be located in or near Japantown. This merits further clarification.

Again, we fundamentally support the need for expanded housing in Japantown. However, we request that the above additional points of analyses and clarifications be completed to make the Environmental Impact Report more comprehensive than it is currently. In its present state, the DEIR is vague, incomplete, and potentially very damaging to San Francisco Japantown. We look forward to your response to our requests, recommendations, and comments.

Sincerely,



Emily M. Murase
Executive Director

Cc: Rich Hillis
Julian Banales
Shelley Caltagirone
Jonas Ionin
Elizabeth White

From: [Kathy Devincenzi](#)
To: [CPC.HousingElementUpdateEIR](#); [White, Elizabeth \(CPC\)](#)
Subject: Comments on SF Housing Element 2022 Update Draft EIR
Date: Tuesday, July 12, 2022 3:18:11 PM
Attachments: [20220712175946.pdf](#)

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

San Francisco Planning Department
c/o Elizabeth White, Senior Environmental Planner

Please see attached comments on SF Housing Element 2022 Update Draft EIR.

Kindly acknowledge receipt.

Thank you.

Laurel Heights Improvement Association of San Francisco, Inc.
By: Kathy Devincenzi, President



Laurel Heights Improvement Association of San Francisco, Inc.

July 12, 2022

By Electronic Mail to CPC.HousingElementUpdateEIR@sfgov.org

San Francisco Planning Department

Re: San Francisco Housing Element 2022 Update Draft EIR

Case No.: 2019-016230ENV

1 The Draft EIR fails to analyze a reasonable range of alternatives to the proposed project and fails to adequately analyze the insufficiency of water supply for City residents and businesses that could foreseeably result from implementation of the policy changes set forth in the proposed project.

The proposed project would adopt policies that would foreseeably be implemented through later zoning changes because the City is obliged to implement its general plan housing element. The Draft EIR (DEIR) explains that the DEIR has been prepared to evaluate the impacts on the environment that could result from adoption and implementation of the housing element update. (DEIR S-1) The Housing Element update is mandated by state law, Government Code section 65583. (*Ibid.*)

2 The housing element update establishes goals, policies, and actions to address the existing and projected housing needs of San Francisco. (*Ibid.*) The goals, policies, and actions are required to plan for the regional housing targets allocated to San Francisco by regional agencies for 2023 to 2031 and to meet future housing demand in San Francisco. (*Ibid.*) The housing element update includes overarching goals for the future of housing in San Francisco that respond both to state law requirements as well as local community values as understood from community outreach allegedly conducted for the housing element update. (DEIR S-1-S-2) The underlying policies and actions would guide development patterns and the allocation of resources to San Francisco neighborhoods. (DEIR S-2) In general, the housing element update would shift an increased share of the City and County of San Francisco's future housing growth to transit corridors and low-density residential districts within well-resourced areas (see **Figure 2-1**, p. 2-2, in Chapter 2, Project Description. (DEIR S-2)

3 The City has failed to conduct a comprehensive planning process as to the areas to which growth would foreseeably be directed under the proposed project. Section 4.105 of the San Francisco Charter provides that in developing their recommendations as to goals, policies and programs for the future physical development of the City and County that take into consideration

social, economic and environmental factors, the Planning Commission “shall consult with commissions and elected officials, and shall hold public hearings as part of a comprehensive planning process.”

The DEIR states that the housing element update would shift an increased share of San Francisco’s projected future housing growth to transit corridors and low density districts within well-resourced areas, citing Figure 2-1. (DEIR 2-1) The DEIR explains that adoption of the housing element would lead to future actions, such as planning code amendments to increase height limits along transit corridors and to modify density controls in low-density areas that are primarily located on the west and north sides of the city. (DEIR 2-1)

In a recent meeting conducted after the DEIR and Figure 2-1 were prepared, the Planning Department staff admitted that the only outreach that the Department conducted in District 2 was to the Cow Hollow and Golden Gate Valley neighborhood associations. The Planning Department failed to conduct the required outreach to the Jordan Park and Laurel Heights neighborhoods that Figure 2-7 shows are projected to have height limits increased to 55 feet in the residential areas, 85 feet in adjacent retail shopping areas and 85 feet in the 3333 California Street property. As the DEIR states at page 2-24: **“Figure 2-7 shows the projected heights and density controls for future development consistent with the housing element update.”** Yet, at the recent remote meeting, Planning Department staff mischaracterized Figure 2-7 as merely one option that could be adopted, rather than as the proposed project. Although everyone appeared to understand that there would be a 2-step process to enact the zoning changes – first adopting the policy changes in the housing element update and second - enacting zoning ordinances establishing increased height limits, the Planning Department repeatedly stated that enacting the housing element – the first step – would not enact the second step. However, the second step is foreseeable because the City must implement its general plan housing element.

The DEIR admits that the proposed action “would result in reasonably foreseeable indirect changes. Specifically, the department assumes that adoption of the housing element update would lead to future actions, such as planning code amendments to increase height limits along transit corridors and to modify density controls in low density areas that are primarily located on the west and north sides of the city, designation of housing sustainability districts, and approval of development projects consistent with the goals, policies, and actions of the housing element update.” (DEIR S-2)

The EIR states that when the EIR uses the phrase “impacts of the proposed action,” it refers to the reasonably foreseeable impacts that would result from those future implementation actions and development compared with the development anticipated under the existing 2014 housing element through 2050. Under the proposed action, the department projects approximately 150,000 housing units would be constructed in the City and County of San Francisco (city) by 2050, compared to 2020 conditions. The department projects approximately 102,000 housing units would be constructed by 2050 under the existing 2014 housing element

4
Cont'd

(2050 environmental baseline). In other words, the department predicts that approximately 50,000 more housing units would be constructed by 2050 if the housing element update is adopted compared with the development anticipated under the existing 2014 housing element.” (DEIR S-2)

5

The EIR also fails to recognize that under San Francisco’s Charter, the City’s zoning must be consistent with its general plan. Section 4.105 of San Francisco’s Charter provides that: “The Planning Department, in consultation with other departments and the City Administrator, shall periodically prepare special area, neighborhood and other plans designed to carry out the General Plan, and periodically prepare implementation programs and schedules which link the General Plan to the allocation of local, state and federal resources.”

6

To date, much new development has occurred in the South of Market and eastern neighborhoods near the Downtown because developer profit has been larger in those areas than in the western areas. This is where developers have chosen to build. As a developer explained to me, it costs the same amount of money to build a unit of housing in the South of Market as it does to construct a unit of housing on Geary Boulevard, but the South of Market unit would sell or rent for more money. Yet, the DEIR fails to acknowledge this reality and is founded on the false premise that the construction that has occurred in the South of Market and eastern areas resulted from unfairness. Also, since the Planning Department approved all the development in the South of Market and eastern areas, it would appear from the City’s premise that Department approvals must have been unfair.

1. The EIR Fails to Analyze the Reasonable Alternative of Encouraging Development and Increases in Height Limits Within One Quarter Mile of Transit Corridors.

7

In 2003, the San Francisco Planning Department released the attached map of residential lots within 1,250 feet of transit and commercial lots (“quarter-mile map”). Policy 11.6 of the 2004 San Francisco Housing Element encouraged “maximizing the opportunity for housing near transit.” (See attached excerpts) In the 2014 San Francisco Housing Element, Policy 1.10 supported “new housing projects...where households can easily rely on public transportation” and Policy 13.3 promoted housing “within an easy walk of” transit and services. (See attached excerpts)

Please analyze an alternative to the proposed action that would encourage residential development and increases in height limits within one quarter mile of the transit corridors and commercial lots depicted on the attached 2003 map. Such an alternative would be more equitable than the proposed project, which would encourage development within approximately one to two blocks of transit corridors and would cause those residential areas to bear a disproportionate share of the adverse impacts of the future growth. In contrast, a quarter-mile alternative would spread out the adverse impacts of the future growth, including the adverse

impacts from noise, air contaminants, shadows and other adverse impacts, more equitably without disproportionately impacting the residential areas within about two blocks of the transit corridors.

The fact that the DEIR fails to include an alternative that would conform with the quarter-mile areas adjacent to transit corridors that were identified as areas to which growth would be directed in prior versions of the housing element is evidence that the range of alternatives analyzed in the DEIR is not reasonable. Further evidence that the range of alternatives analyzed in the DEIR is not reasonable is that the proposed housing element amendment would not encourage increased height limits in the wealthy neighborhoods, but would encourage increased height limits in middle and lower income neighborhoods.

Is it not true that under such a quarter-mile alternative, the adverse impacts of noise, shadows, and air contaminants would be smaller in the affected areas than under the more limited areas that would be affected by the proposed project? Please explain the foreseeable degree of difference in these impacts in the respective affected areas.

2. The DEIR Fails to Adequately Analyze the Proposed Project's Significant Adverse Impact on Insufficiency of Water Supply Needed to Serve Foreseeable Development.

The DEIR admits that if the Bay Delta Plan is implemented, "the SFPUC would require rationing and could develop new or expanded water supply facilities to address shortfalls in single and multiple dry years. Environmental impacts related to new or expanded water supply facilities and increased rationing would result in significant and unavoidable environmental impacts. (*Significant and Unavoidable*)."

 (DEIR 4.9-14)

The DEIR admits that if "the Bay-Delta Plan Amendment is implemented, the SFPUC would be able to meet the projected demand in normal years but would experience supply shortages in single dry years and multiple dry years. Implementation of the Bay-Delta Plan Amendment would result in substantial dry-year and multiple dry-year water supply shortfalls and rationing throughout the SFPUC's regional water system service area, including San Francisco." (DEIR 4.9-2) Although the DEIR acknowledges that the "State Water Board has indicated that it intends to implement the Bay-Delta Plan Amendment on the Tuolumne River by 2022, assuming all required approvals are obtained by that time," the DEIR claims that "implementation of the Bay-Delta Plan Amendment is uncertain because of pending legal challenges and outstanding regulatory actions." (DEIR 4.9-3) Substantial evidence does not support this claim.

The text of the water supply discussion in the DEIR fails to discuss the foreseeability that any of the City's legal challenges or the outstanding regulatory actions will be successful and

fails to acknowledge that the City has sued the State because the State has drastically reduced the amount of water the City can pull from the Tuolumne River to “more than the city has to spare.” (See attached Courthouse News Service, *San Francisco Sues State to Retain Access to Vital Water Supply*, May 14, 2021, stating that City Attorney Dennis Herrera stated in an email that “the state’s most recent effort – done behind closed doors – ignores the science and could leave us with virtually no water during a drought;” *San Francisco, irrigation districts sue California over drought-related water restrictions*, September 10, 2021, stating that drought conditions are growing worse as the climate changes and quoting a senior attorney at the Natural Resources Defense Council as having stated that, “contrary to the suit’s claims, San Francisco and other pre-1914 water rights holders are in fact subject to the state board’s authority.”)

The DEIR misleads the decision makers and the public because it relies on the unsubstantiated claim that there is “a substantial degree of uncertainty associated with implementation of the Bay-Delta Amendment and its ultimate outcome” and because it fails to analyze the potential impacts of further decreased supplies as a result of global warming. (DEIR 4-9-20)

The DEIR is inadequate because it fails to disclose the severity of the San Francisco water supply shortages that would foreseeably result from implementation of the Bay-Delta Plan Amendment. The DEIR also fails to analyze the likelihood that the City’s lawsuit or other regulatory actions will be successful in any degree.

The DEIR admits that under “the Bay-Delta Plan Amendment, existing and planned dry-year supplies would be insufficient with respect to the SFPUC satisfying its regional water system supply level-of-service goal of no more than 20 percent rationing system-wide. (DEIR 4.9-19) The DEIR states: “As shown in **Table 4.9-2**, shortfalls under dry-year and multiple dry-year scenarios would range from 11.2 mgd (15.9 percent) in a single dry year to 19.2 mgd (27.2 percent) in years two through five of a multiple dry-year drought, **based on 2025 demand levels**, and from 29.5 mgd (33.7 percent) in a single dry year to 35 mgd (40 percent) in years four and five of a multiple dry-year drought, **based on 2050 demand** (see **Table 4.9-2**).” (DEIR 4.9-19).

This analysis is inadequate because it fails to analyze the potentially significant impacts of increased water supply insufficiencies as a result of global warming. Please analyze the foreseeable impacts of global warming in increasing the water supply deficiencies in San Francisco based on the 2025 water supply demand levels and 2050 demand described above.

The DEIR admits that:

“rationing at the level that might occur under the Bay-Delta Plan Amendment would require restrictions on irrigation and other outdoor water uses (e.g., car washing), changes in water use behaviors (e.g., shorter and/or less-frequent showers), and changes in how businesses operate, all of which could lead to undesirable socioeconomic effects....high levels of rationing could lead to adverse physical environmental effects, such as a loss of

vegetation resulting from prolonged restrictions on irrigation. Prolonged rationing within the city could make San Francisco a less desirable location for residential and commercial development compared with other areas of the state without substantial levels of rationing, which, depending on location, could increase urban sprawl. Sprawl development is associated with numerous environmental impacts, including for example increased greenhouse gas emissions and air pollution from longer commutes and lower-density development, higher energy use, a loss of farmland, and increased water use from less water-efficient suburban development.” (DEIR 4.9-25)

Please analyze the potential impacts on increased greenhouse emissions that could result from the high levels of rationing discussed above and the potential impact on reduced demand for new housing in San Francisco that could result from high levels of rationing.

8
Cont'd

The DEIR is also inadequate because it claims that the “SFPUC is in the process of exploring additional water supply opportunities through the Alternative Water Supply Planning Program. **Table 4.9-3** identifies the new and expanded water supply facilities that are under consideration. Most of these projects are in the early ‘feasibility’ or ‘conceptual’ planning stages and would take several years to decades to implement.” (DEIR 4.9-20) The DEIR is inadequate for relying on potential new or expanded water supply facilities without providing data showing the financial feasibility and likely funding sources for the potential new water supply projects. The tactic of relying on an unsubstantiated list of speculative expanded water supply projects has been struck down by courts.

The DEIR fails as an informative document because it fails to truthfully inform the decision makers and public of the severity of the water supply problem and the lack of a foreseeable solution to the water deficiencies that would foreseeably result from implementation of the housing element update.

3. The EIR Fails to Analyze a Reasonable Range of Alternatives Because it Fails to Analyze an Alternative Consisting of a Degree of Growth that Can Foreseeably be Supported with Adequate Water Supplies Without More than 20% Rationing.

9

As shown above, there is no substantial evidence that there will be enough water to supply the amount of new housing which the 2022 housing element update seeks to achieve. Please analyze an alternative that would construct an amount of new housing in San Francisco that could likely be served by foreseeable water supplies without more than 20% rationing.

CONCLUSION

For the reasons set forth above and to be supplemented, the Laurel Heights Improvement Association of San Francisco, Inc. objects to approval of the proposed project and certification of the EIR.

Very truly yours,

Laurel Heights Improvement Association of San Francisco, Inc.



By: Kathy Devincenzi, President
Laurelheights2016@gmail.com

Enclosures:

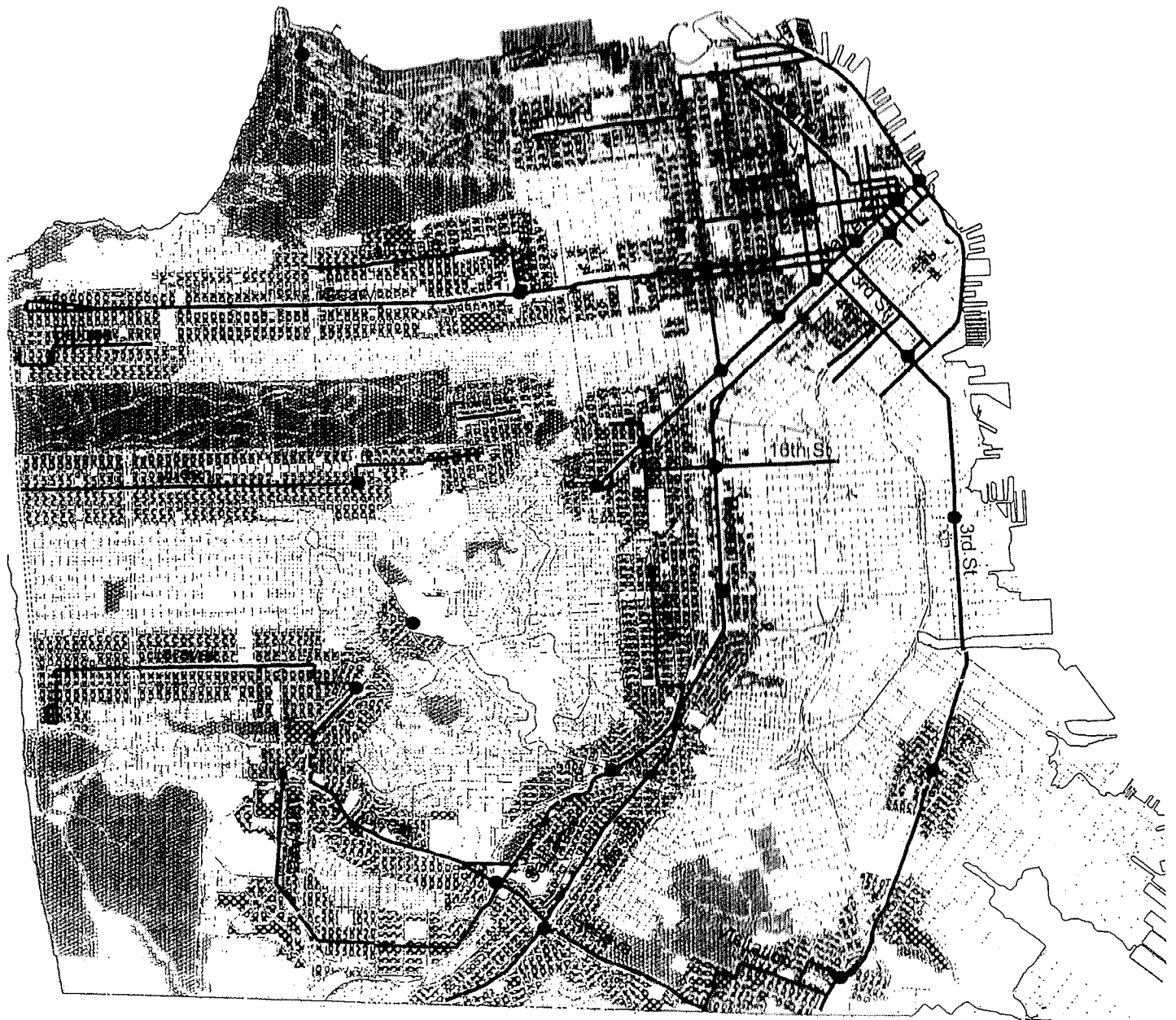
SF Planning Department, 2003 map of Residential Lots within 1,250 ft. of transit and commercial

2004 Housing Element, Proposal for Adoption, excerpts

2014 Housing Element, excerpts

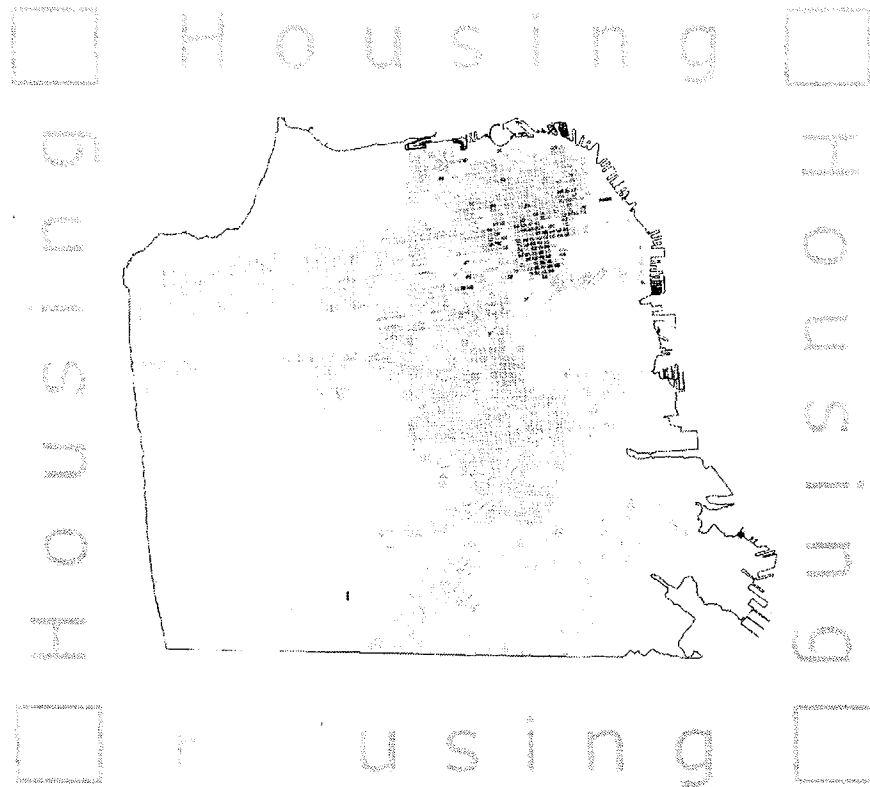
Courthouse News Service, ***San Francisco Sues State to Retain Access to Vital Water Supply***, May 14, 2021

San Francisco, irrigation districts sue California over drought-related water restrictions, September 10, 2021



- Transit Nodes
- ▤ Primary Transit Street
- ▨ Residential Lots within 1,250 ft. of transit and commercial
- ▧ Residential Lots
- ▩ Parks





HOUSING ELEMENT

An Element of the
San Francisco General Plan

PROPOSAL FOR ADOPTION

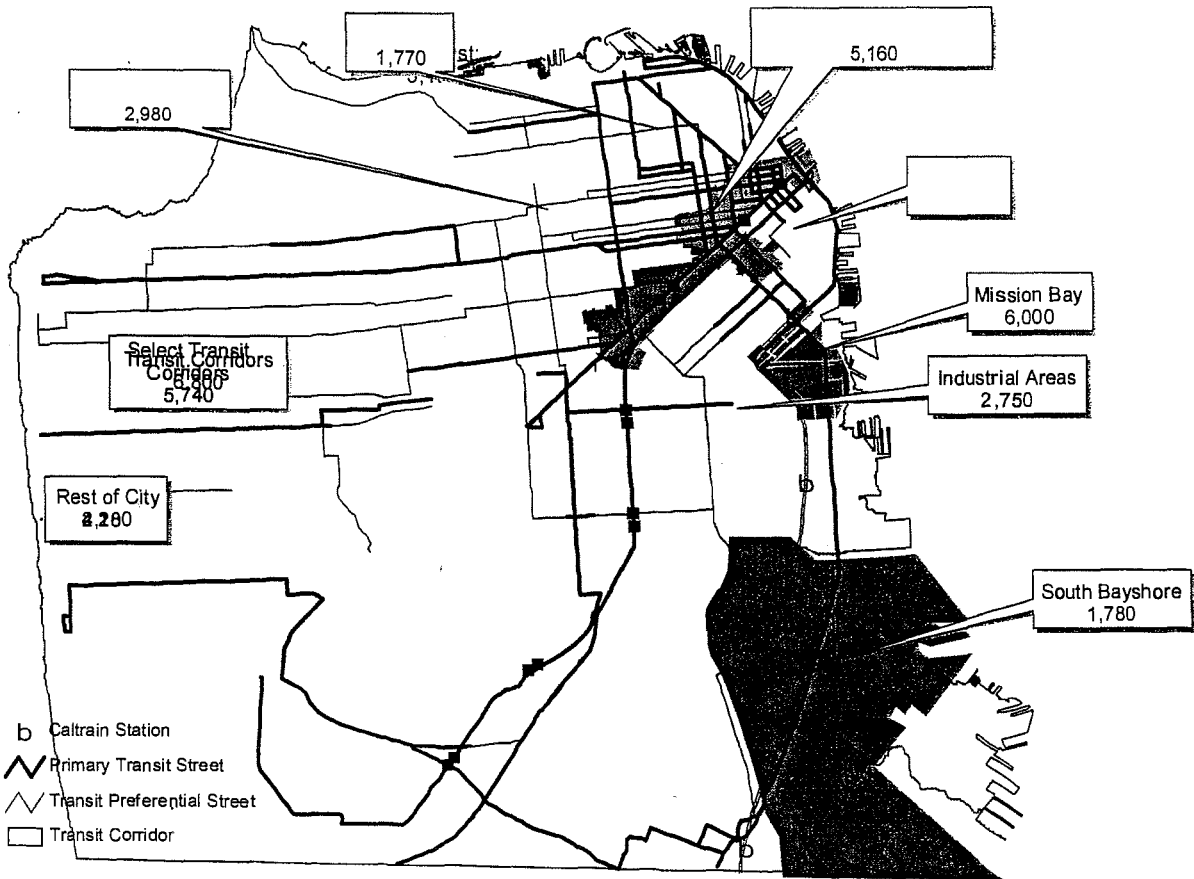
The San Francisco Planning Department
May 2004

007538

Table I-56
New Housing Construction Potential: Undeveloped Sites and Soft Sites

	No. of Parcels	No. of Potential New Units	No. of Acres
Industrial Areas (not including Mission Bay and South Bayshore)			
Undeveloped Sites	212	1,630	31.30
Soft Sites	47	1,124	17.97
Downtown			
Undeveloped Sites	116	3,992	24.82
Soft Sites	24	1,168	7.90
Marina Fillmore			
Undeveloped Sites	383	2,350	48.76
Soft Sites	37	634	11.07
Mission Bay			
Undeveloped Sites		6,000	48.76
Northeast			
Undeveloped Sites	124	1,186	14.26
Soft Sites	15	588	4.95
South Bayshore			
Undeveloped Sites	335	1,483	59.32
Soft Sites	11	296	7.30
Transbay (not including Terminal)			
Undeveloped Sites	52	558	11.18
Soft Sites	10	158	1.98
Transit Corridors			
Undeveloped Sites	1,145	4,670	154.21
Soft Sites	74	1,074	22.88
Rest of City			
Undeveloped Sites	943	2,174	107.83
Soft Sites	19	105	2.39
Undeveloped Sites Subtotal	3,310	24,043	451.68
Soft Sites Subtotal	237	5,147	76.44
TOTAL	3,547	29,190	528.12

MAP I-5
Estimated Potential Housing Units in San Francisco



For better map readability, please see document on-line at
http://www.sfgov.org/planning/citywide/c1_housing_element.htm

A. DETERMINING POTENTIAL HOUSING SITES

The housing potential estimates shown in Tables I-55 through I-57 were derived using a computer model based on an inventory of existing uses citywide. Terms and methods used in this assessment will be discussed below. A database listing all parcels in the City, along with current land uses, zoning designation, and development or lot improvements forms the basis of this evaluation. Land use information collected included type of use,

IMPLEMENTATION 11.5

- The Planning Department will continue to study the construction methods and design components of well-designed housing that enhances the existing urban fabric of San Francisco.
- The Planning Department will continue to use the Residential Design Guidelines when reviewing projects.
- Each project will be considered on its own merit and on its ability to make a positive contribution to the immediate neighborhood and the City.

POLICY 11.6

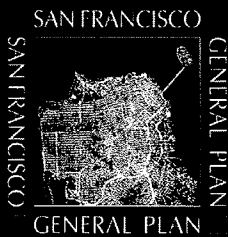
Employ flexible land use controls in residential areas that can regulate inappropriately sized development in new and existing neighborhoods, while maximizing the opportunity for housing near transit.

Increased allowable densities should not detract from established neighborhood characteristics. In many cases, design and efficient site uses can make use of maximum housing densities while keeping resulting units affordable and compatible with neighboring structures.

IMPLEMENTATION 11.6

- The City will continue to promote increased residential densities in areas well served by transit and neighborhood compatible development with the support and input from local neighborhoods.

2014 HOUSING ELEMENT



PART II: OBJECTIVES & POLICIES

**AN ELEMENT OF THE GENERAL PLAN
OF THE CITY AND COUNTY OF SAN FRANCISCO**

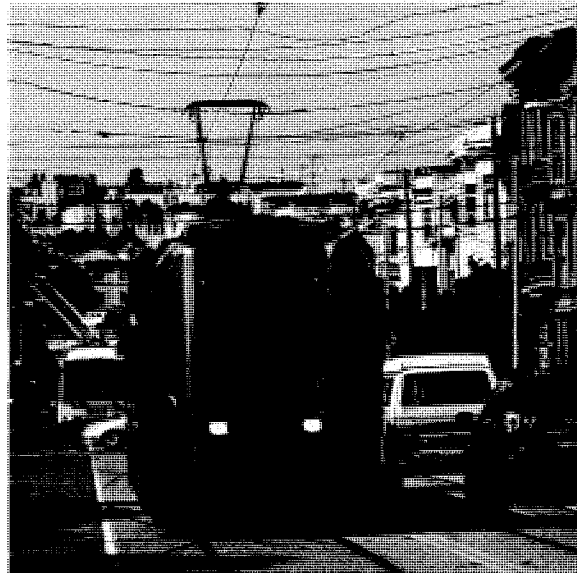
support new construction of student housing that could reduce pressure on the existing housing stock, and should consider incentives for student housing development.

POLICY 1.10

Support new housing projects, especially affordable housing, where households can easily rely on public transportation, walking and bicycling for the majority of daily trips.

San Francisco enjoys an extensive network of transit lines, including a number of major transit lines that provide nearby residents with the opportunity to move about the city without need of a car. Because of proximity to transit and bicycle networks, neighborhood serving businesses and job centers, some 29% of the city's households do not own cars and 33% of San Franciscans take public transit to work, with higher rates for households in transit-rich areas. Infill housing in transit-rich areas can provide lower income households, affordable unsubsidized housing opportunities. Housing with easy access to transit facilitates the City's efforts to implement the City's Transit First policy. Additionally housing near transit can provide site-efficient and cost effective housing.

In reviewing reliance on public transportation, it is important to distinguish areas that are "transit-rich," and located along major transit lines, from those that are simply served by transit. For the purposes of this Housing Element, "major transit lines" are defined as those that have significant ridership and comprehensive service – meaning almost 24-hour service with minimal headways. This network of major transit lines includes BART's heavy rail lines, MUNI Metro's light rail system including the E, J, K, L, M and N lines, and Muni's major arterial, high-ridership, frequent service local network lines. These lines are defined and prioritized in Muni's Transit Effectiveness Project (TEP) as the "Rapid Network." The Department should support housing projects along these major transit lines provided they are consistent with current zoning and design guidelines.



Issue 8: Prioritizing Sustainable Development

OBJECTIVE 13

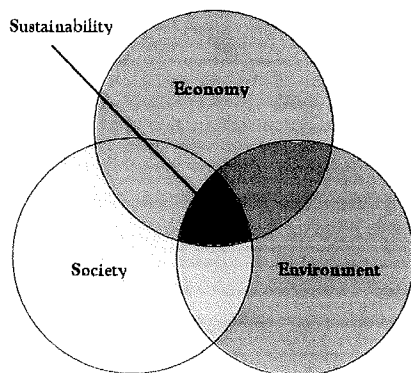
PRIORITIZE SUSTAINABLE DEVELOPMENT IN PLANNING FOR AND CONSTRUCTING NEW HOUSING.

The United Nations' definition of sustainability, also used by the San Francisco Sustainability Plan, states that "A sustainable society meets the needs of the present without sacrificing the ability of future generations to meet their own needs." Accordingly, sustainable development in San Francisco aims to meet all human needs – environmental, economic and social – across time.

San Francisco is often seen as a leader in urban sustainable development, because of its early adoption of a Sustainability Plan (1997), and subsequent policies, from prohibitions on plastic bags and bottled water to the recently adopted Green Building Ordinance. However, sustainable development does not focus solely on environmental issues. It should encompass the way we promote economic growth, so that the most vulnerable, disadvantaged residents get an

equal share of the benefits of growth. Also critical is the concept of social equity, which embraces a diversity of values that are not perhaps as easily quantified as greenhouse gas emissions or marketplace dollars, such as housing & working conditions, health, educational services and recreational opportunities, and general quality of life.

While San Francisco's transit accessibility and role as a regional job center does promote its role as a nexus for new housing development, sustainability does not mean growth at all costs. A truly sustainable San Francisco balances housing production with affordability needs, infrastructure provision, and neighborhood culture and character. Thus, as the City prioritizes sustainability in housing development, all actions need to keep in mind its broad range of environmental, economic and social components, by ensuring that housing development does not degrade environmental quality, or contribute emissions that further impact our resources; by promoting economic vitality so that all citizens have access to housing that is within their means and close to their workplace; and by protecting the rights of all citizens, including preventing their displacement.



POLICY 13.1

Support "smart" regional growth that locates new housing close to jobs and transit.

In San Francisco, and in many of the other job centers in the Bay Area, workers struggle to find housing they can afford. At the same time, employers have difficulty recruiting employees, because of the lack of affordable options near their locations. These trends exacerbate long-distance commuting, one of the primary sources of greenhouse gas emissions; they also negatively impact the working families struggling with such commutes by demanding more travel time and higher travel costs.

The City should support efforts to construct more housing near jobs, and near transit. Yet, sustainable development requires consideration of the impacts of new housing. Plans for smart growth must work to prevent the unintended consequences on low-income residents, such as gentrification and displacement, and to maintain the character and composition of neighborhoods for the long-term.

This answer of new housing near jobs does not apply to San Francisco alone. As part of the larger regional economy of the Bay Area, decisions made by one community - to limit commercial or residential growth - affect other communities in the region. SB 375 attempts to address this at a state level, but continued efforts are required to ensure new residential development is planned region wide to take advantage of the availability of employment opportunities, efficient transportation systems, and community services. It is imperative that governing entities such as the Association of Bay Area Governments and the State structure funding and other incentives to direct local government policies to house their fair, "smart" share of the labor pool, particularly those locations close to transit. San Francisco should take an active role in promoting such policies, and discouraging funding that would enable housing development that is not attached to the use of public transit. The City should also play a greater role in ensuring local and regional growth management strategies are coordinated and complementary.

POLICY 13.2

Work with localities across the region to coordinate the production of affordable housing region wide according to sustainability principles.

Because the need for housing relates to jobs which are provided across the region, planning for housing requires a regional strategy. In a true jobs-housing balance, the workers are the residents of nearby housing, and housing costs are affordable to the local workforce. Provided the type and cost of housing constructed are taken into account, smart growth strategies can address the housing needs of low-income residents, while contributing to diverse communities.

Construction of housing affordable to a mix of incomes must be provided not only in San Francisco, but throughout the region, to allow low-income residents to reach jobs as well as needed services like grocery stores and child-care.

At the present time, most of the region's subsidized housing for low- and moderate-income households is concentrated in the central cities, including San Francisco. Communities throughout the Bay Area, particularly those who provide working opportunities for this same population, should accept responsibility for housing low- and moderate-income households as well. One way of addressing affordability needs across municipal boundaries is to explore the creation of a regional affordable housing fund, which could accept funds from both public and private sources. Another is a permanent state fund that would finance housing for low- and middle-income households, which would ease some of the funding uncertainty that occurs during difficult budget years.

POLICY 13.3

Promote sustainable land use patterns that integrate housing with transportation in order to increase transit, pedestrian, and bicycle mode share.

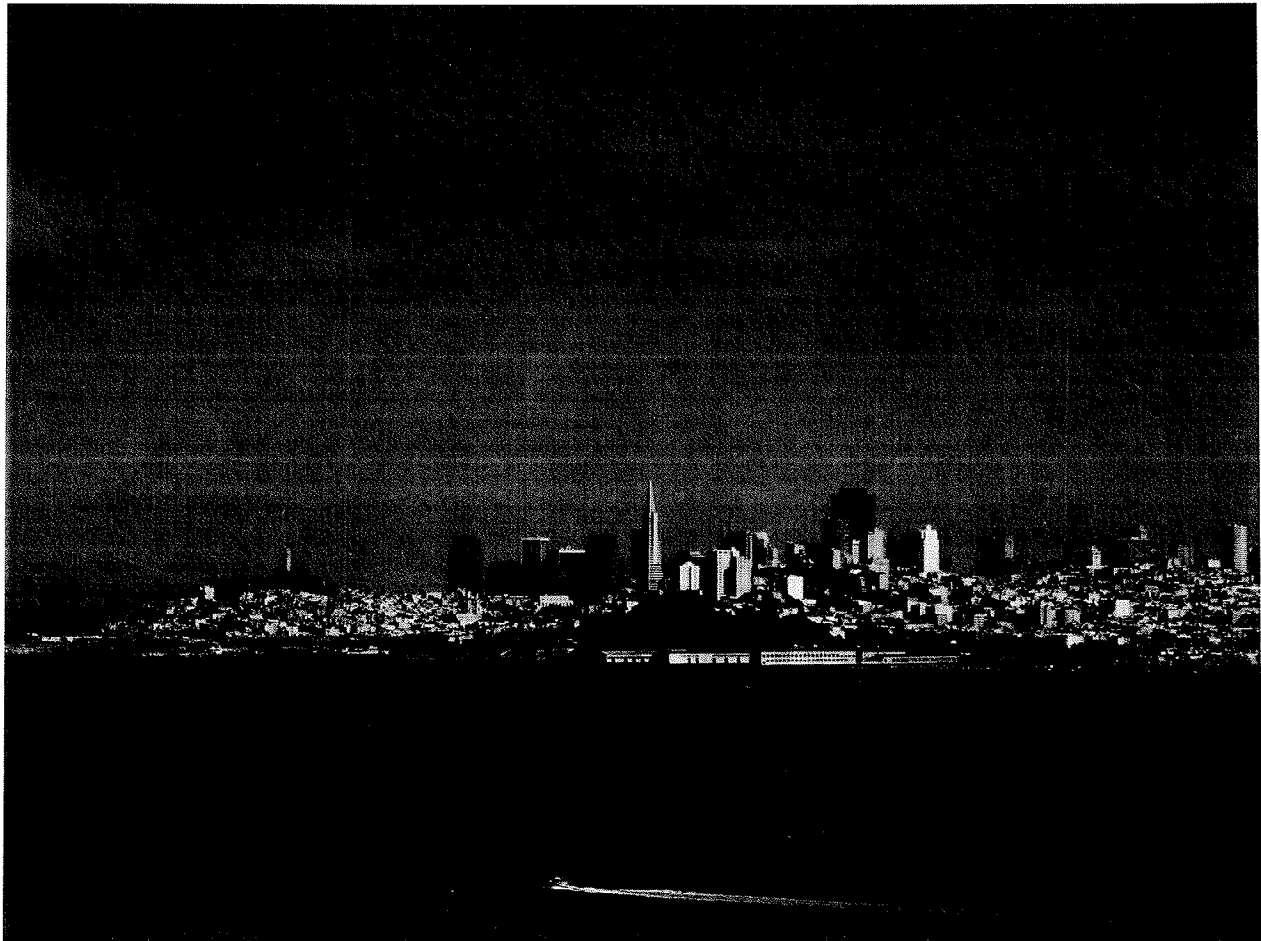
Sustainable land use patterns include those located close to jobs and transit, as noted above. But they also include easy access to, and multiple travel modes between, other services, shopping and daily needs. This could mean all services needed are located within an easy walk of the nearby housing; it could also mean that such services are available by bike or transit, or in the best cases, by all modes. The common factor in sustainable land use patterns is that the need for a private car is limited.

To encourage walking, cycling and transit use, comprehensive systems must be in place. A citywide network of walkable streets, bike lanes that are safe for children as well as the elderly, and reliable, convenient, transit must be in place. The City should continue efforts to improve such networks, to make them more attractive to users. The City should also continue requirements and programs that link developers of housing to contribute towards such systems. Sustainable design that includes improved streets and transit stops adjacent to developed property, as well as the inclusion of mid-block crossings, alleys and bike lanes at larger, multi-block developments, can further incentivize non-automotive movement.

San Francisco Sues State to Retain Access to Vital Water Supply

The city of San Francisco doesn't want to part with its share of the valuable Sierra Nevada water supply but the state may insist. The two are back at it again in court and it's up to a judge to decide who gets the goods.

DUSTIN MANDUFFIE / May 14, 2021



San Francisco, as seen from the Marin headlands. (Chris Marshall/Courthouse News)

(CN) — The city of San Francisco claims state regulators are singling out the city during a drought and trying to deprive residents of a much-needed source of drinking water, namely the Sierra-fed Tuolumne River.

With another drought on the horizon, city officials say the state is being unfair by demanding more water than it needs — and more than the city has to spare. The lawsuit stems from a licensing deal for two dams controlled by a pair of nearby water districts which set the restrictions the city now seeks to maneuver around.

State regulators are calling on the city to abide by the agreement, which would drastically reduce the amount of water it can pull from the Tuolumne River to maintain salmon populations and ensure the river's overall health. City officials claim they can do both while still providing for the 2.8 million residents who rely on the river for drinking water. Over 85% of San Francisco's water supply is

sourced from the Tuolumne River, so city officials feel they have no choice but to fight the proposed restrictions.

“The state’s approach is excessive and unfairly targets San Francisco,” said San Francisco City Attorney Dennis Herrera, in an email. “The state’s Bay-Delta Plan is already an overreach that we’re fighting in court, and these new requirements are even more radical. In the middle of an extreme drought, the state should be working with us to ensure greater drought resiliency. Instead, the state’s most recent effort — done behind closed doors — ignores the science and could leave us with virtually no water during a drought.”

Herrera said the state’s efforts would deprive millions of Bay Area residents and businesses who rely on the important water source just when they need it most, and noted that San Francisco already has among the lowest water usage per capita in the state.

“It’s unfortunate we have to go to court, but that is our only option to protect San Francisco’s water supply and prevent this big giveaway,” Herrera added. “Other measures can effectively protect river wildlife without cutting off San Francisco’s main water source during a drought.”

Lawsuits over water rights in California are as old as the state itself, and this particular fight goes back decades. As climate change ramps up the pressure on the state’s limited water resources, the stakes continue to grow. With fish on one side and farmers on the other — everyone wants their cut of that precious liquid gold.

The city is fighting against flow restrictions put in place by the State Water Board when the board issued a water quality certification as part of the Clean Water Act. The restrictions were enacted to control the amount of water held by Don Pedro Dam and the La Grange Diversion Dam, which are owned by the Turlock and Modesto irrigation districts, respectively. According to the San Francisco Public Utilities Commission, nearly half of the flow demanded by the state will come out of the city’s share of water trapped from the river.

In the lawsuit filed Friday in Tuolumne County Superior Court, the city seeks to have those flow restrictions set aside and claims the board exceeded their jurisdiction in issuing them. City officials say the restrictions are unnecessary and believe the city can protect salmon populations and ensure the continued quality of the river without endangering local residents and businesses during a drought.

Representatives for the San Francisco Public Utilities Commission and Natural Resources Defense Council did not respond to a request for comment by press time.

Follow @dmanduff

Read the Top 8

Sign up for the Top 8, a roundup of the day's top stories delivered directly to your inbox Monday through Friday.

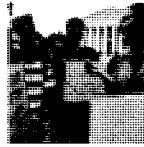
enter your e-mail address

Additional Reads



San Francisco mayor's pick to replace progressive district attorney garners scrutiny

July 7, 2022



Longtime obstacles to abortion access may thwart people coming to California for care

July 5, 2022



California lawmakers reach deal on record state budget

June 27, 2022



As Po dries up, Italy's food and energy supplies are at risk

June 17, 2022

© 2022, Courthouse News Service

[About Us](#) / [Masthead](#) / [Advertise](#) / [Terms of Use](#) / [Privacy Policy](#)

[Do Not Sell My Personal Information](#)

Connect with us on our social channels:

CLIMATE

San Francisco, irrigation districts sue California over drought-related water restrictions

PUBLISHED FRI, SEP 10 2021•12:50 PM EDT UPDATED FRI, SEP 10 2021•2:58 PM EDT



Emma Newburger
@EMMA_NEWBURGER

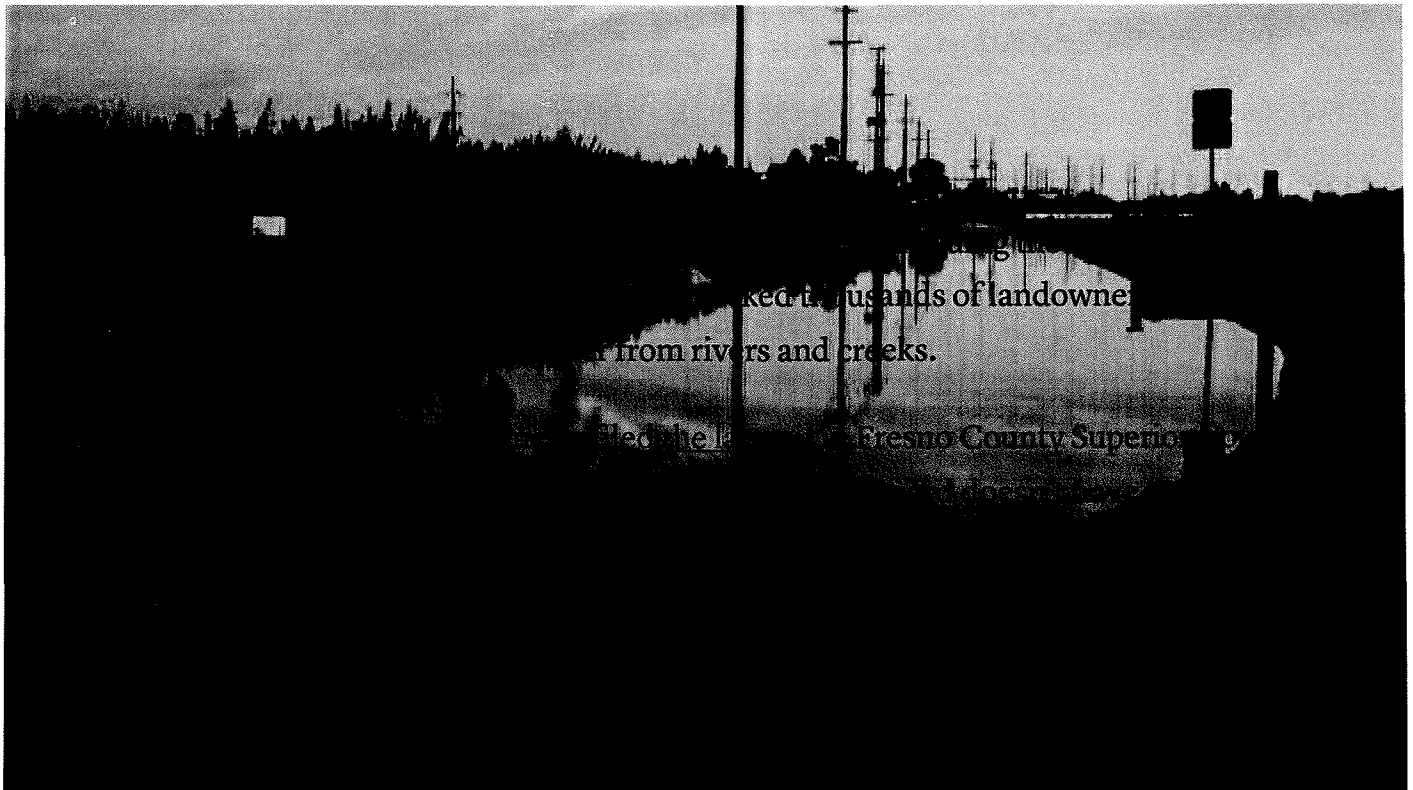
WATCH LIVE

KEY POINTS

San Francisco and a group of Central Valley irrigation districts are suing California for implementing drought restrictions that have blocked senior water holders from diverting water from rivers and creeks.

The lawsuit, filed in Fresno County Superior Court, argues that the California State Water Resources Control Board doesn't have the legal authority to require water holders to stop diverting water, even during a drought.

The state board orders come as California grapples with a record-breaking drought that has depleted reservoir levels and threatened water supplies.



93% of the state is currently experiencing Severe to Exceptional Drought, and conditions are growing worse as the climate changes.

Similar fights could play out across the southwestern U.S. in coming years as water shortages mount. For instance, earlier this year, the U.S. Bureau of Reclamation announced plans to ration water from the Colorado River to Arizona and Nevada, paving the way for a battle with farmers and municipalities in those states.

In August, the state board ordered roughly 4,500 water right holders to halt water draws from rivers and canals that feed into the Sacramento-San Joaquin River Delta, which is experiencing low water levels from the drought. The order was one of the most aggressive curtailments ever under the state's water rights system.

State officials had argued the orders would help preserve stored water to protect drinking water supplies, prevent salinity intrusion and protect the environment. The Delta watershed provides two thirds of the state with drinking water.



VIDEO 10:09

How the Western 'megadrought' could cause more 'water wars'

“This decision is not about prioritizing one group over the other, but about preserving the watershed for all, implementing our water rights priority system and ensuring we manage through this drought,” E. Joaquin Esquivel, chair of the state board, said in an August statement.

The suit argues that the state board has no authority to curtail water rights secured before 1914, the year when the state board started regulating water draws. The suit claims that only the courts have jurisdiction over the water rights of holders before 1914. It also argues that the state board hasn't adequately measured water use and thus can't properly ration it.

The San Joaquin Tributaries Authority is a coalition of water agencies whose suppliers include the Modesto Irrigation District, Turlock Irrigation District, Oakdale Irrigation District, Merced Irrigation District, South San Joaquin Irrigation District and San Francisco.

A spokesperson for the state board declined to comment on the litigation.

Doug Obegi, a senior attorney at the Natural Resources Defense Council, [said in a blog post on Wednesday](#) that, contrary to the suit's claims, San Francisco and other pre-1914 water rights holders are in fact subject to the state board's authority.

The recent suit “is just the latest example of the privileged few with senior water rights wrongly claiming they are above the law,” Obegi said.

VIDEO 02:12

California fires creating their own weather systems

Mad Money

WATCH IN THE APP

UP NEXT | **Shepard Smith** 07:00 pm ET

TRENDING NOW



I talked to 70 parents who raised highly successful adults: 4 things they refused to do with their kids



Homebuyers are canceling deals at the highest rate since the start of the pandemic



From \$10 billion to zero: How a crypto hedge fund collapsed and dragged many investors down with it



Millennial and Gen Z's days of remote working could be numbered, says author



Doctors must provide abortions in medical emergencies, regardless of state law, HHS says



From: [Joseph Smooke](#)
To: [CPC.HousingElementUpdateEIR](#)
Cc: [Hillis, Rich \(CPC\)](#); [Chion, Miriam \(CPC\)](#); [Jonin, Jonas \(CPC\)](#); [Tanner, Rachael \(CPC\)](#); [Moore, Kathrin \(CPC\)](#); [Diamond, Susan \(CPC\)](#); [Fung, Frank \(CPC\)](#); [Koppel, Joel \(CPC\)](#); [Imperial, Theresa \(CPC\)](#); [Ruiz, Gabriella \(CPC\)](#); [Board of Supervisors, \(BOS\)](#); [BOS-Legislative Aides](#); [Race & Equity in all Planning Coalition \(REP\)](#)
Subject: Re: Housing Element Draft Environmental Impact Report Case No. 2019-016230ENV
Date: Tuesday, July 12, 2022 1:27:58 PM
Attachments: [REP Response to Housing Element DEIR 12July22_UPDATED and FINAL.pdf](#)

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

Dear Elizabeth

Many apologies, but I just found out that Faith In Action Bay Area has signed on as a co-signer to the REP-SF comment letter to the Housing Element DEIR.

As such, I have updated our comment letter and have attached the updated and corrected final version.

Best regards,

--joseph smooke on behalf of REP-SF

co-founder of [People Power Media](#)

[Creators of PRICED OUT](#)

[See the animation that will change the way you think about housing!](#)

On Tue, Jul 12, 2022 at 12:01 PM Joseph Smooke <joseph@peoplepowermedia.org> wrote:

Dear Elizabeth

Please find attached to this e-mail the comment letter from the Race & Equity in all Planning Coalition (REP-SF). The following organizations and individuals have also co-signed this letter:

Organizations:

D4ward
 Housing Rights Committee of San Francisco
 First Mennonite Church of San Francisco
 Richmond District Rising
 San Francisco Land Use Committee
 Westside Community Coalition
 West Side Tenants Association

Individuals:

Christen Alqueza, District 1 resident
 Sandra Dratler, District 1 resident
 Barbara Webb, District 1 resident
 Joseph Nunez, District 2 resident
 Rio Barrere-Cain, District 5 resident
 Debbie Benrubi, District 5 resident
 Linda Chafetz, District 5 resident

Madeleine Levin, District 5 resident
Allan Pleaner, District 8 resident
Barbara Stevenson, District 8 resident
Betsy Strausberg, District 8 resident
Robin Roth, District 10 resident

We look forward to working with Planning to develop a viable Equity Alternative to the DEIR as described in this letter.

Respectfully submitted,

--joseph smooke on behalf of REP-SF

co-founder of [People Power Media](#)

[Creators of PRICED OUT](#)

[See the animation that will change the way you think about housing!](#)



12 July 2022

Elizabeth White
Senior Environmental Planner
49 South Van Ness Avenue, Suite 1400
San Francisco, CA 94103
 and CPC.HousingElementUpdateEIR@sfgov.org

Re: Housing Element Draft Environmental Impact Report
Case No. 2019-016230ENV
State Clearinghouse No. 2021060358

Dear Elizabeth,

The Race & Equity in all Planning Coalition (REP-SF) appreciates Planning's stated goal to "ensure that we adopt a housing plan truly centered in racial and social equity in 2023." REP-SF continues to want to collaborate as an active and engaged partner with Planning to make this goal a reality.

The [Race & Equity in all Planning Coalition](#) is a coalition of [35 grassroots organizations](#) from neighborhoods across San Francisco that have united to ensure a future with diverse communities, stable, affordable housing and equitable access to resources and opportunities. REP-SF declares an end to profit-driven policies that are impoverishing and displacing historically marginalized communities— BIPOC, immigrant, low-income and no-income residents, seniors, and people with disabilities— from San Francisco. REP-SF rejects the notion that market-based strategies will solve our city's issues of segregation, unaffordability, gentrification, and displacement, and is concerned that the Housing Element relies too heavily on market-based strategies.

1 The Housing Element DEIR is deficient largely because it fails to study a viable Equity Alternative to the "Proposed Action" also called the "Proposed Project." As an "Information Document" (Volume 1, p. 1-2) that is required by the California Environmental Quality Act (CEQA) to provide the public with a complete and thorough assessment of the proposed project and alternatives that could result in lesser environmental impacts, this DEIR, therefore, fails and is inadequate. Per the "Standards for Adequacy of an EIR" (Volume 1, p. 1-2) this DEIR also fails by not providing "decision makers with information that enables them to make a decision that intelligently takes account of environmental consequences." By not presenting a viable Equity Alternative, Planning's DEIR misleads policy makers into thinking that an Equity Alternative is not feasible.

REP-SF's sole purpose is to work in a coordinated way with its three dozen member organizations, in conjunction with City policymakers and planners, toward greater racial, social and economic equity in land use and planning. REP-SF has commented extensively on every draft that Planning staff has presented of the Actions and Strategies for the Housing Element, including a written presentation of REP-SF's recommendations for how the Housing Element could actually accomplish bold goals for racial and social equity. Instead of meaningfully incorporating these recommendations, and further consulting with REP-SF and other organizations in San Francisco that have years of experience identifying the problems and innovating solutions for racial, social and economic equity, this DEIR simply gestures very briefly toward what it quickly dismisses as an infeasible Project Alternative called the "100 Percent Affordable Housing Alternative" (p. 6-235 of Volume II of the DEIR).

As described, Planning's "100 Percent Affordable Housing Alternative" would impose a moratorium on market rate housing until the "housing production targets for below moderate income households are met." Planning rejected this approach because it would not provide housing affordable for "middle-income households" and it would "be contrary to Government Code section 66300, the Housing Crisis Act, which prevents cities from implementing moratoria or similar restrictions on housing, such as limiting the number of land use approvals or permits, in most circumstances."

Fortunately, imposing a moratorium on market rate housing and building only 100% affordable housing projects is not the only way to achieve equity. It is imperative that we thoroughly explore and detail a viable Equity Alternative through a process that involves Planning staff, REP-SF, Planning's Equity Council, and other grassroots organizations that have racial, social and economic equity as their focus, working together to identify priorities and strategies that meaningfully and practically ensure that the outcomes of this housing element reverse San Francisco's history of over producing high-priced market rate housing and severely under producing housing that's affordable for households with low, moderate and middle incomes. There must be deliberate and large-scale strategies that shift the foundation of the Housing Element in order to reverse the imbalances caused by our past and present land use and housing policies.

Some of the policies and strategies that should be explored by an **Equity Alternative** could include, but would not be limited to:

1. Aggressive site acquisition and land banking of affordable housing development sites to secure a long term pipeline of 100% affordable housing developments;
2. Planning and MOHCD working together with community organizations to identify and prioritize these affordable housing development sites to ensure that these sites are in strategic and desirable locations as defined by community-based organizations, and to ensure that affordable housing is built in all parts of San Francisco. MOHCD's participation is necessary for 1) resource development to plan for sufficient funding to purchase, hold and develop these sites; 2) manage the processes for selecting nonprofit organizations to manage and develop these sites;
3. Update the City's density bonus programs so the projects that are eligible for greater heights and density are developments that are deed restricted for 100% affordable housing;

1
Cont'd

4. Further update the City's density bonus programs so market rate housing can only qualify for greater heights and density if they provide a large increase in the inclusionary (below market rate housing) requirement (more than is required by HOME-SF), and a requirement that the inclusionary units be provided at the site of the primary development;
5. Implement an aggressive program of acquiring and rehabilitating existing apartment buildings and Single Room Occupancy residential buildings (SROs) for middle, moderate and lower income households through what is commonly known as the Small Sites Acquisition program, with sites identified and prioritized by community based organizations;
6. Create a working partnership between Planning and MOHCD to create and implement an affordable housing land use plan and resource allocation and commitment plan to ensure that both departments are working closely together to ensure that the city's affordable housing goals are clearly defined and sufficiently funded, and implemented expeditiously;
7. Commit to a process that engages Planning, Planning's Equity Council, MOHCD, the Housing Stability Oversight Board, REP-SF and CCHO to identify enough development sites to build sufficient affordable housing in every Supervisorial district to meet our affordable housing goals. Then, follow this site identification process with a rezoning plan that rezones these sites for increased density affordable housing. Accompanying this plan would be a resource commitment for site acquisition and predevelopment;
8. Put communities at the forefront of site selection, and prioritize community planning processes that build the leadership of low-income, immigrant, youth, and working class residents and address economic, racial, and social inequalities today and far into the future;
9. Invest in resources and programs that lead to greater land / property ownership for BIPOC, low-income and marginalized communities.
10. Define "affordable" so the prices of the affordable housing are truly affordable for households and communities most in need, as defined by those communities.
11. Develop a land use plan for adaptive re-use of public lands for 100% affordable housing, supportive housing, community services, accessible open spaces and small business opportunities, and restrict the re-use of public lands for these purposes;
12. Create a land use and resource allocation plan for enough supportive housing to house everyone who is currently without a home in San Francisco pursuant to Prop C;
13. Create an [Equitable Development Data Tool](#) similar to what New York City has developed in order to monitor progress toward our equity goals in a detailed and transparent way, and to provide publicly accessible information about what types of housing market rate developers are proposing to build, and what that housing is expected to cost;
14. Prohibit homes from being used for commercial purposes such as "short term rentals" or "intermediate length occupancies" which encourage displacement of existing residents and encourage escalation of housing costs.
15. Protect rent-controlled homes from demolition. In the event of the demolition of a rent-controlled building, the replacement units should not only be subject to our rent control ordinance but also, should be deed restricted to the income of previous tenants if they come up for sale.

Deficiencies of the "Proposed Action"

- 2 In describing the "Proposed Action," or the Proposed Project, Planning describes its intention to "shift an increased share of the City and County of San Francisco's (city's) future housing growth to

transit corridors and low-density residential districts within well-resourced areas." (Volume 1, p. S-2). However, rather than tackling the issue of affordability, the only question this Housing Element seems to attempt to answer is one of production. As described in the Housing Element, Planning assumes that the equilibrium point where supply and demand curves intersect will be at a price point that most San Franciscans can afford. Unfortunately, as presented in the Housing Element (Volume 1, p. 4.1-63), San Francisco has built more than 1.4 units of housing for every person since 1950, demonstrating clearly that the lack of supply is a myth. Since this overproduction of housing has resulted in a six-fold increase in the cost of housing, clearly, the supply and demand curves are intersecting at a price point that is well out of reach for most San Franciscans.

The [recent reports](#) presented to the Board of Supervisors about the high number of vacant units, more than 40,000 units (~10% vacancy rate) underscore these statistics. Despite these production statistics and the continuing propensity of housing prices to escalate faster than the rise in real wages, the overproduction of ever more expensive housing during the current Housing Element cycle, it is hard to understand why Planning continues to focus its intentions and formulate its "Proposed Action" around its misplaced faith in the "housing market" that appears to have no intention or ability to deliver housing that is widely affordable to the majority of San Franciscans who are unable to afford the housing that market rate developers are building.

Increasing the potential yield of units from 102,000 (if the current Housing Element were to remain in place through 2050) to 152,000 with this new Housing Element by 2050 (Volume 1, p. 4.1-90) does not address the imbalance in production by income and affordability. The DEIR acknowledges that the current Housing Element has resulted in gross over production of housing targeted to upper income households while far under producing housing affordable for low to middle income households (Volume II, p. 6-235), but it does nothing with the Proposed Action to correct this imbalance. In fact, the Housing Element relies even more heavily on for-profit, market rate developers by reducing its affordable housing goals from 57% to its newly stated goal which is to build 70% market rate and only 30% below market rate housing over the next thirty years (Volume 1, p. 2-8). This approach simply worsens the already damaging pattern of racial, social and economic imbalance and inequity.

Both the [RHNA mandates](#) and San Francisco's [Housing Balance program](#) passed by the voters in 2015 establish housing production goals broken down in terms of specific goals for different income levels, to ensure that there is an equitable distribution of housing affordability. When describing "San Francisco Plans and Policies" in Chapter 3 of the DEIR which starts on Volume 1, p. 3-1, the DEIR fails to mention or make reference to [San Francisco's Housing Balance](#). Not only does the Housing Balance require Planning to "monitor and report bi-annually on the Housing Balance between new market rate housing and new affordable housing production" as the summary states on Planning's website, but "also requires an annual hearing at the Board of Supervisors on strategies for achieving and maintaining the required housing balance in accordance with the City's housing production goals." This quote can be found in the "background" section of the actual Housing Balance reports, [the most recent of which is linked here](#). There, however, are no plans to bring the city's housing stock or development pipeline into balance, and this Housing Element does nothing to address San Francisco's underperformance with respect to this policy.

By approaching the Proposed Action or Proposed Project by focusing high-priced, market rate development on "transit corridors" and "low-density residential districts within well-resourced areas," the Housing Element takes an approach that seeks to provide developers with streamlined opportunities to capitalize on unrealized underlying value from both existing infrastructure and future height and density increases. Transit corridors provide a stable source of escalating land value by the very nature of their transit infrastructure and networks of commercial and pedestrian activity. Many of San Francisco's transit corridors are homes to low-income and people of color households that will be increasingly vulnerable to gentrification and displacement resulting from the strategies outlined in the "Proposed Action."

Well-resourced areas, or "[opportunity areas](#)" as identified by the State of California, are intended to be areas for increased development of 100% affordable housing in order to provide lower income households access to communities that present potential for "positive economic, educational, and health outcomes for low-income families- particularly long-term outcomes for children." As stated in HCD's report, the intent of these opportunity maps is "to accompany new policies aimed at increasing access to high-opportunity areas for families with children in housing financed with 9% Low Income Housing Tax Credits." Targeting also extends to "similar policies in other state funded programs such as HCD's Multifamily Housing Program and the California Debt Limit Allocation Committee's regulations for 4% LIHTC's..." These quotes are from [pages 1 and 2](#) of the "California Fair Housing Task Force, Methodology for the 2022 TCAC/ HCD Opportunity Map, December 2021." These "opportunity areas" are not mapped with the intention of encouraging more high-priced, market rate housing development. Rather they are mapped in order to increase 100% affordable housing development in these areas to provide access for low income households to these areas that have more resources than low income neighborhoods typically have had access to.

Therefore, we find that throughout the Housing Element, there is a lack of planning for equitable outcomes, and there is a lack of disclosure of potentially reduced environmental impacts caused by approaches that would also result in equitable outcomes. The entire focus of the Housing Element appears to be on production of market rate units without prioritization for those who are unable to afford the high-priced housing that market rate developers build. The rationale behind the distribution of development as detailed in the Proposed Action (Proposed Project) is purely based on adding density where there is less density of development. An equitable distribution of building heights and unit density is purely a strategy for distributing bigger, denser buildings. This is not, however, a strategy that will result in racial, social or economic equity.

For instance, if the production goal for below market rate housing in the current Housing Element cycle was 57%, but the actual production was closer to 20%, then it would follow that this new Housing Element should make every effort to produce enough affordable housing in order to correct for the past deficit, and to meet the future demand for affordable housing. The danger of Planning's approach to exacerbate the deficit of affordable housing is underscored by the findings quoted in Volume I, p. 4. 1-75 from the study about the impacts of market rate housing:

"The highest socio-economic groups move in at higher rates than other groups and move out at lower rates. In other words, the highest socio-economic groups experience disproportionate benefits of new market-rate housing production."

2
Cont'd

Achieving equity will only be accomplished by committing to deliberate, concrete strategies for achieving equity. Relying on the profit-motivated development sector to provide equitable outcomes through deregulation, which is what this Housing Element does, will only continue to result in greater inequality and displacement. REP-SF advocates an [equity solutions framework](#) of Desegregation, Affordability, Culture & Arts, Stability and Sustainability. For this solutions framework to move us toward greater equity, each component must be addressed. Addressing each of these components is what the strategies listed above are intended to do.

This DEIR is deficient as an Information Document and does not meet the Standards for Adequacy of an EIR for at least these several reasons:

1. It is unclear how the Preservation Alternative, which is described as the "environmentally superior" alternative, or elements of the Preservation Alternative, have been incorporated into the mitigations for the Proposed Action (the Proposed Project).
2. Recent reports about the extraordinarily high rate of vacant units (more than 40,000 units or 10% of the city's housing stock) have not been taken into consideration. Production goals should be adjusted to take this information about vacancies into consideration. According to the RHNA guidelines from ABAG, a healthy vacancy rate is considered to be more than 5%, yet San Francisco's vacancy rate is more than double this benchmark which indicates that the issues with San Francisco's housing market are due factors other than a lack of supply.
3. Recent reports about vacant large-scale commercial buildings in the Financial District that have potential for adaptive re-use as affordable housing have not been taken into consideration. Adaptive re-use of existing buildings has a different environmental impact than building new, especially with the potential scale of adaptive reuse that repurposing large commercial buildings could offer.
4. As recommended above, Planning and MOHCD should work collaboratively on an aggressive program to acquire existing apartment buildings in order to stabilize the tenancies and provide permanent affordable housing. This is not just an expeditious program for providing affordable housing. It is also an environmentally superior approach that uses existing buildings rather than building new ones. This DEIR is deficient because it does not study nor disclose the environmental benefits of adaptive reuse and rehabilitation of existing buildings vs the construction of new residential buildings.
5. Recent reports about the proliferation of Intermediate Length Occupancy uses and Short Term Rentals and their impacts on displacement and gentrification have not been taken into consideration.
6. Recent reports about the correlation between loss of income and loss of housing have not been taken into consideration, including for example [Housing Our Workers: Getting to a Jobs Housing Fit](#). This analysis found that only 7% of our local San Francisco workforce can afford current market rate rents and that over 40% of workers don't reside in the city, thus fueling increased commute distances and escalating global greenhouse gas emissions. The analysis demonstrates that the prohibitive costs of market housing creates a significant rent burden for workers in a wide range of jobs and concludes that San Francisco must plan for the affordable housing needs of our local San Francisco workforce in order to alleviate rent burden, lessen commute distances, and reduce our carbon footprint.
7. The increases in building heights prescribed and detailed in this Housing Element will lead to a significant increase in [concrete](#) and steel construction which has a far greater [environmental impact](#) than wood frame and engineered lumber construction. There are ways

8
Cont'd

to reduce the impacts of these construction [methods and materials](#), but these mitigations are neither disclosed nor discussed in the DEIR. Planning must work with the Department of Building Inspection to recommend

8. The Proposed Action or Proposed Project anticipates demolition and displacement, but the DEIR does not measure or disclose the environmental impacts of displacement. These environmental impacts of displacement must be evaluated especially in light of the data released in January of 2022 about the high rate of vacancies in San Francisco's housing stock. Whereas previously it may have been assumed that displacement of people from one socio-economic level were being replaced by another, which may have led some to conclude that there was little environmental impact, we can now see that a significant number of housing units in San Francisco are vacant while people are displaced from San Francisco as a result of Planning's market-based housing strategies. With this DEIR, there must be a study of the impacts of people with lower incomes who are displaced from San Francisco due to high housing costs, but must still commute to work because they must work at a physical location, versus those who are able to work from home. This is a very real dynamic as the geography of work and the geography of commutes have shifted dramatically and those shifts are becoming long term. These environmental impacts must be studied by sector and income level and disclosed as part of this DEIR.

10

REP-SF understands that the typical protocol is for these comment letters to a DEIR not to be answered until release of the "Comments and Responses" document which is published as the Final Environmental Impact Report (FEIR). We understand that Planning expects the FEIR to be published in January, 2023. However, we request to engage in a dialogue with Planning to shape this Equity Alternative together, and to start that process of developing the Equity Alternative as soon as possible, so we can develop a meaningful Equity Alternative together in a way that moves this Housing Element toward the racial and social equity goals that both Planning and REP-SF want to see without delaying the Housing Element process.

Respectfully submitted,

The Race & Equity in all Planning Coalition, San Francisco (REP-SF)

Co-signers:

Organizations:

D4ward
Faith In Action Bay Area
First Mennonite Church of San Francisco
Housing Rights Committee of San Francisco
Richmond District Rising
San Francisco Land Use Committee
Westside Community Coalition
West Side Tenants Association

Individuals:

Christen Alqueza, District 1 resident

Sandra Dratler, District 1 resident
Barbara Webb, District 1 resident
Joseph Nunez, District 2 resident
Rio Barrere-Cain, District 5 resident
Debbie Benrubi, District 5 resident
Linda Chafetz, District 5 resident
Madeleine Levin, District 5 resident
Allan Pleaner, District 8 resident
Barbara Stevenson, District 8 resident
Betsy Strausberg, District 8 resident
Robin Roth, District 10 resident

cc **Planning Director, Rich Hillis**
 Planning Equity Director, Miriam Chion
 Planning Commissioners
 Planning Commission Clerk, Jonas Ionin
 Board of Supervisors
 Board of Supervisors, Legislative Aides

From: [White, Elizabeth \(CPC\)](#)
To: [CPC.HousingElementUpdateEIR](#)
Subject: FW: ***DRAFT SUBMISSION*** (FINAL SUBMISSION TO FOLLOW) Comments re Housing Element and Draft EIR Cycle #6
Date: Tuesday, July 12, 2022 6:59:38 AM

From: aeboken <aeboken@gmail.com>

Sent: Monday, July 11, 2022 11:29 PM

To: cpc.HousingElementUpdate@sfgov.org; White, Elizabeth (CPC) <elizabeth.white@sfgov.org>; Haddadan, Kimia (CPC) <kimia.haddadan@sfgov.org>; Caltagirone, Shelley (CPC) <shelley.caltagirone@sfgov.org>

Subject: ***DRAFT SUBMISSION*** (FINAL SUBMISSION TO FOLLOW) Comments re Housing Element and Draft EIR Cycle #6

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

TO: San Francisco Planning Department

FROM: Eileen Boken,
President

Sunset-Parkside Education and Action Committee (SPEAK)

[Westside, Outside Lands, Supervisorial District 4]

RE: Comments for Housing Element and Draft EIR Cycle #6

PROLOGUE

(Excerpts from SFGATE article titled San Francisco is Forever Dying by Michelle Robertson updated July 9, 2021.)

https://url.avanan.click/v2/https://www.sfgate.com/essays/article/End-of-the-Golden-Gate-book-review-16281983.php_.YXAzOnNmZHQyOmE6bzo1MTdkMjU5NmYwOGFkY2E4NmI2N2FiOWExNzkzOWQ2ZDo2OjNlM2Q6NzliMTVjZml5ZmU5MjRkNzg3MzVjMDNjNWYyOWE3YTJiM2Y1OWQ4YjY3NTA2ZGM0YWZiMWEyOTFiOTk0NTU5Mzp0OkY

"The San Francisco I knew and loved has been face-lifted, sleeked, chromed, polished, colonized, homogenized, and marginalized as a cultural innovative force," writes Peter Coyote in "San Francisco, For Sale by New Owners." "The transformation was accomplished in a smooth, seamless manner by money and addiction to power."

"San Francisco," he writes earlier in the essay, "is too expensive, too monoculturally wealthy. Tech wealth and privilege have transformed it into a cushy enclave for the heartless."

(Excerpts report titled "Superstars": The dynamics of firms, sectors and cities

leading the global economy by McKinsey Global Institute dated October 24, 2018.)

<https://url.avanan.click/v2/https://www.mckinsey.com/featured-insights/innovation-and-growth/superstars-the-dynamics-of-firms-sectors-and-cities-leading-the-global-economy>.YXAzOnNmZHQyOmE6bzo1MTdkMjU5NmYwOGFkY2E4NmI2N2FiOWExNzkzOWQ2ZDo2OjZiZmQ6MjZlMGJhOTE3ZDY4YjNlMzc4ODhmOGNmODU3MDhmMGVhYjc4ODcwZDVjMDkwOWY4YjU5MmZmOGUyY2M4MDM0Yjp0OkY

[San Francisco has been classified as a Superstar City.]

"We find superstars exist not only among firms but among sectors and cities as well, although the trend is most evident among cities and firms. Relative to peers, superstars share several common characteristics. In addition to capturing a greater share of income and pulling away from peers, superstars exhibit relatively higher levels of digitization; greater labor skill and innovation intensity; more connections to global flows of trade, finance, and services; and more intangible assets than do their peers.

For cities, our metric includes GDP and personal income per capita. These measures allow us to discover which economic activities are becoming more valuable over time, where the benefits flow, and what linkages exist, if any, among sector activities and superstar firms and cities.

. The dynamics of cities

For cities, we analyze 3,000 of the world's largest cities, each with a population of at least 150,000 and GDP (adjusted for purchasing power parity) of at least \$125 million, that together account for 67 percent of world GDP. By our definition, 50 cities, including Boston, Frankfurt, London, Manila, Mexico City, Mumbai, New York, Sydney, Sao Paulo, Tianjin, and Wuhan, are superstars (Exhibit 5). The 50 cities account for 8 percent of global population, 21 percent of world GDP, 37 percent of urban high-income households, and [45 percent of headquarters](#) of firms with more than \$1 billion in annual revenue. The average GDP per capita in these cities is 45 percent higher than that of peers in the same region and income group, and the gap has

grown over the past decade."

OVERVIEW

From the perspective of the Westside, the Housing Element and its DEIR are seriously flawed for the following reasons:

- The HCD methodology revision based on SB828 (Wiener) is seriously flawed, which has been confirmed by State Auditor. The link is below.

<https://url.avanan.click/v2/https://www.auditor.ca.gov/reports/.YXAzOnNmZHQyOmE6bzo1MTdkMjU5NmYwOGFkY2E4NmI2N2FiOWExNzkzOWQ2ZDo2OjY1YTE6MTQ3MmI1Y2FhNjM2MmUyZWUwNTY3OWRhYTMxODg5MzliZDJKMDc1ZDMxZGM0NDc2NmUwM2IzNjBmMDM0MGZlZDp0OkY2021-125/index.html>

- Besides criticism from the State Auditor, the HCD methodology has been criticized by elected officials and community advocates for failing to be revised to reflect a post pandemic shift. The audit has also been criticized for focusing on smaller COGs rather than the larger ones e.g. ABAG, SCAG and SANDAG.

- The HCD RHNA allocation to ABAG is seriously flawed as it's based on HCD's flawed methodology.

- ABAG did not appeal its RHNA allocation to HCD.

- The ABAG methodology used to distribute its HCD RHNA numbers across the region is seriously flawed as the majority of the RHNA numbers were assigned to cities like San Francisco. Although the San Francisco Planning Director stated at a Housing Element meeting for District 2 on July 7, 2022 that the allocation was proportional to population, many nonprofits and community advocates testified during public comment at an ABAG meeting that they strongly disagreed with this assessment.

- San Francisco didn't appeal its RHNA numbers to ABAG.

- The San Francisco RHNA allocation of 10,000 units per year is twice the number of units per year (5,000) that the City has ever produced. The Planning Department has stated the increase is in part due to carryover from previous cycles. This is a misrepresentation. The increase is due to changes in RHNA methodology.

- Per SB35 (Wiener), there are now penalties, fines and by right approvals if RHNA goals aren't met.

- Even in its present form, HCD is unlikely to approve San Francisco's Housing Element as HCD has approved only a small fraction of those submitted by other municipalities in the State. HCD is viewed as being arbitrary and capricious in these rejections.

- A lawsuit may be filed against HCD for its current RHNA numbers. San Francisco

has the opportunity to join this lawsuit rather than accept unreasonable RHNA numbers.

CARRYING CAPACITY

If all 330 million Americans wanted to live in San Francisco, would this be feasible? Extremely unlikely. If all 40 million Californians wanted to live in San Francisco, would this be feasible? Very unlikely.

That being said, the Planning Department has steadfastly refused to address the issue of carrying capacity.

The Planning Department has stated that their goal is to add 500,000 new residents to San Francisco.

To accomplish this goal, the Planning Department's primary focus seems to be on newcomers and those who want to live here.

The Planning Department's lowest priority seems to be on residents who have lived here decades if not generations. Many of these longtime residents are being pushed out or their needs are being marginalized.

Regarding pandemic loss in the City's population, at the District 2 Housing Element meeting on July 7, 2022, the Planning Director stated that this was cyclical and that the City's population would rebound. SPEAK is unaware of any studies that support this statement and considers this to be hypothetical.

THE ROLE OF MARKETING RESEARCH IN VALIDATING HOUSING ELEMENT STRATEGIES

As far as SPEAK is aware, there has been no marketing research on consumer preference re housing in San Francisco. There has been no research done by either public or private entities as to where residents or potential residents actually want to live or what types of housing they prefer.

Do tens of thousands of additional residents actually want to live on the Westside so that the Housing Element's growth patterns are in sync with consumer preferences?

If not, is the Housing Element's geographic distribution of new housing units focusing heavily on the Westside arbitrary and capricious?

And, is this geographic distribution of new housing units focused heavily on the Westside based primarily on the ideology of SPUR, the Bay Area Council, the Silicon Valley Leadership Group, McKinsey and global capital?

Is there a segment of the City's population who has been led to believe that by building more housing on the Westside that the cost of housing in other parts of the City where they actually do want to live will go down?

THE ROLE OF FINANCIAL FEASIBILITY IN VALIDATING HOUSING ELEMENT STRATEGIES

1
Cont'd

2

2

At a Housing Element presentation for District 2 on July 7, 2022, staff stated that to produce the affordable housing component of the Housing Element would cost \$1 billion per year over the 8 year cycle.

However, a local media outlet has reported that to implement the affordable component of the Housing Element would cost \$19 billion, which appears to include workforce housing.

A Bay Area economist states it would be either \$15,438,000,000 or \$18,151,000,000 based on a unit cost of \$750,000 and an inclusionary percentage of 20% or 15% which does not include workforce housing.

Staff also stated that the \$1 billion per year over 8 years could come from the State. SPEAK believes that this lacks credibility as the bulk of State funds would go to Southern California as that is where the bulk of the population is.

Do these numbers make the Housing Element's affordable housing goals financially infeasible?

Added to the cost of the affordable housing is also the City's current debt portfolio. Per Fitch Ratings, the City has \$2.5 billion in outstanding General Obligation Bond debt and \$1.3 billion in outstanding Certificates of Participation debt.

In the nine years between 2012 - 2020, the City placed nine General Obligation Bonds on the ballot which were approved. This was a very aggressive timeline.

During the Housing Element presentation for District 2 on July 7, 2022, the Planning Director stated that the economics have to work for individual projects to be built.

As the US is a market driven economy, the same is true for strategies proposed in the Housing Element. The financing must be in place, construction materials and labor must be available plus interest rates and inflation must be within a certain range.

Otherwise, no matter what the Housing Element plans for won't be built.

The Housing Element seems to be premised on the ideology that upzoning is a primary tool to add affordability. However, upzoning increases land value due to value recapture and high rise construction is more expensive than low rise construction.

During public comment at the Planning Commission, the massive upzoning of the Westside was described as another form of urban redevelopment.

The Housing Element ignores the fact that there are an estimated 48,000 vacant housing units in San Francisco alone and an estimated 1.2 million vacant housing units statewide.

CHALLENGING THE HOUSING ELEMENT DEFINITION OF THE WESTSIDE AS A HIGH RESOURCE AREA

SPEAK strongly challenges this characterization, which could be seen as arbitrary and capricious.

The Westside is not a jobs rich area. The merchant corridors provide only a small fraction of the jobs with most residents working outside the area.

With the exception of Lowell High School and St Ignatius Prepatory, schools on the Westside are no better than the rest of the City and could not be considered outstanding.

The Westside is not a transit rich area. Most transit lines run east/west to get residents to work in other parts of the City and region. Transit frequency is not reliable. For these reasons, the Westside has the highest rate of car ownership in the City.

Until the most current redistricting, the Sunset-Parkside had only Stern Grove as a major park. Golden Gate Park was entirely in District 1. Golden Gate Park access has recently been limited due to a Board of Supervisors decision.

The Westside lacks the infrastructure for significant growth.

Many of the drinking water pipes are 100 years old. They have issues with leaks and would need to be replaced with larger pipes to accomodate significant growth.

There are inadequate Emergency Firefighting Water System (EFWS/AWSS) pipes west of 19th Avenue. Besides expanding the pipes, an oceanside pump station would need to be installed.

Based on online sources, the San Francisco Fire Department has 48 stations (including SFO) but only 9 are located on the Westside. This coverage seems to have been designed for a lower density.

The electrical grid capacity appears to have also been designed for lower density with most wiring being overhead rather than underground.

The California Independent System Operator (CalISO) reports that there may be a statewide shortage of electricity during extreme climate events.

The Sunset-Parkside has only one police station with Taraval Station covering the largest geographic area in the City. This also appears to have been designed to be consistent with a lower density.

6

The Westside has lower density cookie cutter row houses that reflect its working class roots. Densification, like in other parts of the City, would likely create widespread displacement and gentrification resulting from the demolition of working class housing.

Working class housing combined with inadequate infrastructure are inconsistent with the definition of a high resource area.

IMPACTS OF CLIMATE CHANGE

San Francisco is the City of St Francis. This should inform strategies of the Housing Element.

Could the quality of life in San Francisco be degraded by the strategies in the Housing Element?

PUBLIC HEALTH

Could public health be degraded by increases in contagious diseases due to pack and stack?

Could boil water alerts increase due to algae blooms?

San Francisco has already been declared an urban heat island. **Refer to link below. Less mid block open space could intensify this.**

7

https://url.avanan.click/v2/___https://www.google.com/amp/s/abc7news.com/amp/san-francisco-weather-climate-central-report-urban-heat-island-summer/10957576/___YXAzOnNmZHQyOmE6bzo1MTdkMjU5NmYwOGFkY2E4NmI2N2FiOWExNzkzOWQ2ZDo2OmRiZWm6YzJkODQ1MDIIMWE3MmY4Yzk5MmJiMjFkZmQzNGQ0MzMwZDgzNTE2ZmRmNDY3NjU5ODQzOGUzYzE4NTI5NmFlODp0OkY

Air quality could be degraded for a number of reasons e.g. the day the sky turned orange.

Demolition and disposal of old construction as well as the resource extraction and deforestation of materials for new construction can take up to 30 years to create a carbon offset.

Reduction of tree canopies could reduce air quality.

PUBLIC SAFETY

Could evacuation routes for earthquakes and fires be overwhelmed as they are designed for a lower density?

Could urban wildfires increase in the City's heavily wooded areas?

Could SoMa's sinking accelerate with high rise construction as this area is marshlands?

DRINKING WATER

8

The SFPUC has both retail customers in San Francisco as well as wholesale customers in other parts of the Bay Area.

In a public safety emergency, San Francisco must share its water equally with its wholesale customers per State Water Code Section 73503. Below is the link to that code.

https://url.avanan.click/v2/https://codes.findlaw.com/ca/water-code/wat-sect-73503.html___.YXAzOnNmZHQyOmE6bzo1MTdkMjU5NmYwOGFkY2E4NmI2N2FiOWExNzkzOWQ2ZDo2OmM1ZWZkMzNhMTcxODhiZjViOGI0NTgzM2VjNmMyNWJiNTM5MWY4OGYwNzg5ZWZkODQ5ZWYwMzFjYjdjYz00kY

The Urban Water Management Plan (UWMP) is the premier document on water for the City and is produced by the SFPUC. A link to the document is below.

https://url.avanan.click/v2/https://sfpuc.org/about-us/policies-plans/urban-water-management-plan___.YXAzOnNmZHQyOmE6bzo1MTdkMjU5NmYwOGFkY2E4NmI2N2FiOWExNzkzOWQ2ZDo2OjU0N2E6Yzg5ZWZkMzNhMTcxODhiZjViOGI0NTgzM2VjNmMyNWJiNTM5MWY4OGYwNzg5ZWZkODQ5ZWYwMzFjYjdjYz00kY

At the Housing Element presentation for District 2 on July 7, 2022, the Planning Director stated that the MTC and Plan Bay Area 2050 (PBA 2050) are the main determinants for water issues. These are misstatements. The Metropolitan Transportation Commission (MTC) is not involved in water. Although PBA 2050 addresses sea level rise, it doesn't address water issues in general.

The UWMP covers drinking water issues but does not cover firefighting issues.

The most current UWMP has stated that there is sufficient water to support the City's projected growth. However, other experts have challenged that assertion.

The implementation of water rationing alone should challenge that assertion.

That assertion is further challenged as the SFPUC has filed 2 lawsuits against the State Water Resources Control Board (SWRCB). One of those lawsuits contends that the SFPUC is unable to meet its environmental obligations on the Tuolumne River due to inadequate water supplies.

For San Francisco, not all reservoirs have been seismically retrofitted and many drinking water pipes are over 100 (one hundred) years old dating back to the days of the Spring Valley Water Company.

These aged drinking water pipes have ongoing leaks and ruptures & do not have the capacity to handle significant amounts of new growth especially on the Westside.

It's only since 2018 that all new construction has been mandated to be individually metered for water usage.

The following is a quote from the Department of the Environment regarding the requirement for individual water metering for new residential construction.

"Yes, in new construction each housing unit, each commercial tenant, and outdoor irrigation are each required to have separate utility meters or equivalent accuracy submeters per [CA Plumbing Code 601.2](#). I think the amendment to CA Plumbing Code was adopted during the 2018 drought.

Previously, CalGreen just required commercial common area, commercial tenants, and outdoor irrigation to be separately metered in new construction. Those provisions remain, but there was an issue that some plumbing inspectors chose not to enforce CalGreen. (They viewed themselves only responsible for Plumbing code; the logic did not make sense.) So the State of CA added emphasis by amending the Plumbing Code.

The water metering requirements are noted on [all of San Francisco's GS forms](#). The Design Professional of Record is accountable for compliance with all provisions of applicable code."

8
Cont'd

Does the City have a water rationing plan that involves retrofitting housing units built between 1990 - 2017 to install individual water meters? This would be the most reliable method of enforcing any mandatory rationing.

The SFPUC has a "water first" policy. The SFPUC produces hydro power from Hetch Hetchy. The "water first" policy states that if there is a low level of water then the SFPUC will prioritize water conveyance over producing hydro power. This could lead to shortages in hydro power for San Francisco.

WATER FOR CATASTROPHIC FIREFIGHTING

The Emergency Firefighting Water System (EFWS) aka the Auxiliary Water Supply System (AWSS) is an independent, high pressure, high volume water system specifically designed to fight catastrophic fires. It was brought into service in 1913.

From 1913 to 2010 it was under the jurisdiction of the SF Fire Department with engineering by DPW.

On May 10, 2010 it was transferred to the SFPUC by then Mayor Newsom as a means of balancing the City's budget.

Since being transferred to the SFPUC, the SFPUC has proposed a number of controversial strategies. The most controversial is to change EFWS/AWSS from a non-drinking water firefighting system to a drinking water based system.

Retired firefighters have voiced strong opposition to using drinking water for fighting catastrophic fires.

9

Below is an excerpt from their open letter to City officials.

"In the interest of public safety, [we must state that] it is completely irrational to assume that drinking water from municipal reservoirs will be adequate to reliably supply a high-pressure, high-volume hydrant system, like the Auxiliary Water Supply System, for fighting multiple simultaneous fires following a major Bay Area earthquake.... Based on our combined 2,000 years of professional firefighting experience, we must clearly state that the only practical solution for supplying a citywide high-pressure hydrant system ... is to use the inexhaustible supply of saltwater that is readily available on three sides of the City."

The value of a redundant water system dedicated to fighting catastrophic fires is echoed by the California Department of Emergency Services (CalOES) report from September 2018 titled State of California Hazard Mitigation Plan.

The EFWS/AWSS is specifically referenced in Annex 3.2.1 which identified these principles:

"In both the emergency [firefighting] water system and the transportation system, the importance of redundancy demonstrated. To ensure lifeline redundancy, the [emergency firefighting water] backup system should be independent."

OTHER

The pandemic has caused significant demographic shifts.

These demographic shifts are in part due to the emergence of remote work as a major force.

REAGANOMICS REDUX

In his speech at the 2022 Summit of the Americas, President Biden stated unequivocally that "Trickle down economics does not work".

Below is the link to the video:

<https://news.yahoo.com/trickle-down-economics-doesnt-says-032724847.html>

Despite the fact that Reaganomics has never worked, there are legislators who advocate for "trickle down housing" claiming that building market rate housing will make other types of housing more affordable.

Much of the housing legislation being passed in Sacramento is based on "trickle down housing". Since its inception in 1969, Housing Element policy has failed. Production of affordable housing continues to decline.

The Housing Element for RHNA cycle #6 is no exception. It's based on Reaganomics.

It's SPEAK's understanding that the City's proposed Housing Element eliminates Conditional Use for demolitions as a form of Reaganomics deregulation.

The Housing Element is not holistic.

The Housing Element is a pre-pandemic document which assumes that the City will return to its pre-pandemic form.

The Housing Element and Planning Department are not focusing on the types of housing that the City actually needs.

San Francisco is a charter city not a general law city.

Re the Westside, it's a false narrative that building more housing on the Westside will reduce housing prices in other parts of the City.

Re the Westside, the Housing Element proposes to build more market rate housing on the Westside even though there is already a glut.

Re the Westside, the Housing Element proposes to use the same scorched earth approach on the Westside as urban redevelopment did decades ago.

CONCLUSION

As the Mayan prophecy states, in the end time there will be no secrets.

From: [Ann Arora](#)
To: [CPC.HousingElementUpdateEIR](#); [Hillis, Rich \(CPC\)](#); [Tanner, Rachael \(CPC\)](#); [Moore, Kathrin \(CPC\)](#); [Diamond, Susan \(CPC\)](#); [Fung, Frank \(CPC\)](#); [Koppel, Joel \(CPC\)](#); [Imperial, Theresa \(CPC\)](#); [Ruiz, Gabriella \(CPC\)](#); [Donovan, Dominica \(BOS\)](#); [Stefani, Catherine \(BOS\)](#)
Subject: Dear Director of Planning Hillis and Planning Commission Members...
Date: Thursday, July 7, 2022 9:51:20 PM

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

Dear Director of Planning Hillis and Planning Commission Members:

I am writing to express my objection to the proposed revision to the building height limitation upward to 85 feet from the existing limit of 40 feet for Jordan Park as represented by Fig. 2-7 on page 2-25 of the Draft Environmental Impact Report (“EIR”) Volume I for the San Francisco Housing Element 2022 Update” of the General Plan.

• One of the guiding principles behind the housing element is that the development of new housing should be balanced fairly given that the west side has not absorbed much of the high density new residential development in the past. Based upon Fig. 2-7, it appears that the area delineated by Clement, Euclid and Pine Streets to the north; Park Presidio to the west; Anza to the South; and Fillmore to the east (the Delineated Area”) is being targeted to assume a disproportionate percentage of the 50,000 dwelling units (“D.U.s”) that the city is seeking to add by 2050. However, while several other neighborhoods including the Sunset, Noe Valley, Pacific Heights, Presidio Heights, Sea Cliff and the Marina would see more density, they would not be subjected to similar height increases under the proposed plan. Therefore, this plan clearly fails to meet its stated objective and standards of “fairness.”

• Certain zones within the Delineated Area are targeted for even more dramatic building height limits of 200 feet (the former Lucky Penny site, for example) and Geary, as a commercial street and major east/west thoroughfare, is targeted for increased building height limits, which is understandable. However, allowing the height limitation increases to bleed into the neighboring many residential side streets, like Jordan, Commonwealth, Palm and Parker, is not. The Jordan Park Historic District is eligible for the California Register of Historical Resources under “Criterion C (architecture).” The proposed height increase would destroy the existing fabric, scale and character of the neighborhood that qualifies it for consideration as a “Historical Resource.”

• From more technical viewpoint, as it currently exists, the West Side does not have the infrastructure (e.g. roads, parking, facilities, wastewater capacity, etc.) to bear the burden of the proposed development. For example, while the city plans to add 66 new recreational facilities by 2050, and our neighborhoods are currently well served in this regard, only

3
Cont'd

six of the 66 planned new facilities are to be located in the West Side of the City. Thus, the West Side will be underserved in the future should this plan be realized.

4

- The proposed changes would irreparably divide neighborhoods in direct contradiction to one of the stated objectives of the Housing Element. In the section "Impacts and Mitigation Measures" (4.1-19 of the EIR Vol. I). Impact LU-1 dictates that "the proposed actions would not physically divide an established neighborhood." Specifically, this section states that "the proposed action would not directly or indirectly create any new physical barriers within the city that would divide established neighborhoods." Permitting buildings to be constructed to a height more than twice the height of the existing homes would directly and indirectly divide Jordan Park! This change would destroy the character of the neighborhood, eliminate vistas into and out of the neighborhood and materially reduce the natural sunlight in the neighborhood! All these impacts are contrary to the stated objectives of the EIR.

5

The Planning Commission must consider/develop other alternatives and scenarios for how the planned growth and development can be more evenly and equitably distributed throughout the city. Regardless of where they seek to increase the housing stock in the city, no residential side streets should have height limitations as great as 85 feet. This will irreparably damage the urban fabric of our city and the character of our neighborhoods.

Sincerely,

Ann and Anil Arora
740 Euclid Ave, SF 94118

Ann Arora, MFT
Bringing Mindfulness to Work

ann@annarora.com
C: 415-939-4728
O: 415-255-3221

In compliance with HIPPA and other federal and state statutes, certain types of electronic data transmissions must conform to internal and external format requirements. This transmission may contain information that is privileged, confidential and/or exempt from disclosure under applicable law. If you are not the intended recipient please do not read, copy, use, or disclose this communication to others; also please notify the sender by replying to this message and then delete it from your system
Sent from my iPhone

From: Charles Ayers <info@email.actionnetwork.org>
Sent: Wednesday, June 8, 2022 12:53 PM
To: jonas.ionin@sfgov.org
Subject: Item 2019-016230ENV: plan for 10,000 homes per year by 2031

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

Planning Commission Secretary Jonas Ionin,

1 This Environmental Impact Report is an impact report for outdated housing targets. The report studies alternatives based on Mayor Lee's 2017 goal of building five thousand units per year by 2050, but former Mayor Lee's goal predates our RHNA and even predates the bill that outlined the parameters for calculating RHNA, that bill being Senator Wiener's SB 828. It is difficult to overstate how different these goals are: our RHNA requires ten thousand units per year by 2030, not five thousand units per year by 2050.

While expedient, it is wrong to not study a lawful alternative. Our city is walking blind into the actual environmental effects of accommodating our housing targets, and our city risks blowing all of our affordable housing funding.

Please add an alternative that studies rezoning for over seventy thousand additional units, as our RHNA requires. It is negligent not to.

2 I urge you to address the comments made by UC Davis Professor Chris Elmendorf in his analysis of the draft EIR:

<https://url.avanan.click/v2/> https://drive.google.com/file/d/10plS1Sd6T7FdKBkgd5DD1MbOsEnJgbE1/view_.YXAzOnNmZHQyOmE6bzo1NWY0MjdhOGYwMDY2MWlyZTA5MDAwZWJiMTMzMzk0Zjo2OjFhYmI6YzFmZTA2NmQ0MjcyYmQ5MjMzMzYmNmJMTM5NDEwZGFjZmQ4ZTJjMTIiOGIzNDNmMGY5N2I2OTI2ZjIzNDEwZDMxYzYp0OIQ

Charles Ayers
cayers99@gmail.com
1600 15th Street, 525
San Francisco, California 94103

From: Cliff Bargar <info@email.actionnetwork.org>
Sent: Wednesday, June 8, 2022 9:13 PM
To: CPC-Commissions Secretary <commissions.secretary@sfgov.org>
Subject: Item 11 this week: infill housing is GOOD for the environment

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

Planning Commission Staff Commission Affairs,

The Draft Environmental Impact Report (topic 2019-016230ENV) does not adequately address the transportation impacts of building more housing, especially on Vehicle Miles Traveled (VMT). Transportation is an important topic because "San Francisco has many more jobs than homes; as a result, workers must commute into San Francisco each day to reach their jobs" (4.1-68). The DEIR further states that "on average, people living or working in San Francisco have lower levels of VMT per capita than people living or working elsewhere in the nine-county San Francisco Bay Area region" (4.4-12). The message is clear that SF commuters impact the environment less than other residents and workers in the Bay Area region. This means that any environmental analysis should also consider the impact of a project and alternatives on the nine-county Bay Area as a whole.

However, the DEIR fails to reflect regional VMT in its analysis of which alternative is environmentally superior. The DEIR claims that the No Project Alternative is environmentally superior because it would construct fewer housing units (S-5); this claim is at odds with the impact of GHG emissions from the No Project Alternative. The DEIR determines that "although regional total daily VMT would increase because of the additional housing, the percentage increase would be less than what would be anticipated if the additional housing were located in an area with per capita VMT that is higher than the regional average." In other words, the No Project Alternative would lead to higher regional VMT and therefore greenhouse gas emissions because it would not decrease the number of workers who commute into San Francisco from areas with higher VMT per capita.

UC Davis Professor Chris Elmendorf has written a letter to the city detailing these concerns in more detail, and I support his comments:

https://url.avanan.click/v2/_https://drive.google.com/file/d/10pIS1Sd6T7FdKBkgd5DD1MbOsEnJgbE1/view_.YXAzOnNmZHQyOmE6bzpkNmJkMjg3NTJkOGZkMDE0NGQ1MGM1ZmYwODhkOTIyMjo2OjdmNTk6NTc0NzM1MDMyZGRhN2Y3ZjMxYzlhMjY4Mzc3ZGY2OTZlMzRiYzg5NDYxMTQzNjFkNzcwZTg4MmNhOGNhYmZhZjp0OIQ

The EIR should therefore not refer to the No Project Alternative as the environmentally superior alternative, as doing so fails to recognize the GHG emissions which would result from it. Instead, the DEIR should plan to accommodate over 10,000 new housing units per year to address the climate crisis.

Cliff Bargar
cliff.bargar@gmail.com
 160 Connecticut St
 San Francisco, California 94107-2442

April 21, 2022

Maia Small
2022 Housing Element
San Francisco Planning Department

Ms. Small,

Thank you for taking the time to discuss the Housing Element and the approach/methodology the Planning Department used to identify the geographic areas within the City to rezone. As I stated during our call, I was surprised and frustrated to see that only one-third of Church Street, along SFMTA's J-Church line and a main north/south public transit corridor, is currently being considered for rezoning under the Housing Element. When I began to explore the reason for this, I learned that the re-zoning map the Department used was based on the outer boundary of the High/Highest Opportunity Areas as defined by the State Treasurer of California for 2021 (Exhibit B). Later that same year, in December of 2021, this same Opportunity Map was updated to include Church Street in its entirety (and the areas immediately adjacent) as a High/Highest Resource Area (Exhibit A). As such, excluding parts of Church Street from rezoning would be in direct conflict of Policy 20 of the Housing Element report to "Increase mid-rise and small multi-family housing types in Well-resourced Neighborhoods near transit, including along SFMTA Rapid Network. This is particularly troubling since the Housing Element is intended to serve as a road map for housing creation with long-term implications through 2031, while the rezoning decision hinges on a snapshot of time (and are excluding areas that have met its criteria consistently in other years).

A Momentary Snapshot in Time

In the process of preparing this letter, I reviewed the opportunity maps for the five-year period between 2018 and 2022 and identified the following:

(1) Church Street (and the areas immediately adjacent) between 30th Street and Market Street was identified as a High/Highest Resource area in the 2018, 2019 and 2022 Opportunity Map.

(2) A closer examination of the numbers based on which the 2020 and 2021 Opportunity Map was drawn reveals that, during these two years, only the education score dipped slightly below the threshold to be classified as a High/Highest Resource area, while the economic and environmental scores were well above their respective thresholds. Following this two-year period, Church Street in its entirety was again classified as a High/Highest Resource area in the 2022 Opportunity Map

(3) Per the Methodology used for the TCAC/HCD Opportunity Map – "Opportunity mapping also has limitations. For example, maps' accuracy is dependent on the accuracy of the data behind them. Data may be derived from self-reported surveys of subsets of an area's population, and sometimes may not be recorded or reliable in some areas".

I think it is imperative that the Planning Department does not adopt a narrow lens approach by taking a momentary snapshot in time of Church Street with regards to rezoning under the Housing Element. The

Opportunity Maps of three out of the last five years place Church Street, in its entirety, as a High/Highest Opportunity area. Furthermore, the 2022 Opportunity Map (most recent data) places Church Street, in its entirety, back within the High/Highest Opportunity area, firming the fact that this area is not losing its place as a High/Highest resource area, but has rather experienced a temporary blip of data inconsistency.

Planning for densification along Transit Corridors

Policy 20 of the Housing Element states:

“Increase mid-rise and small multi-family housing types in Well-resourced Neighborhoods near transit, including along SFMTA Rapid Network and other transit, and throughout lower-density areas, by adopting zoning changes or density bonus programs.

*a. Increase the opportunity for mid-rise multifamily buildings through changes to height limits, removal of density controls, and other zoning changes along SFMTA’s Muni Forward Rapid Network and other transit lines such as California Street, Union Street, Lombard Street, Geary Blvd., Judah Street, Noriega Street, Ocean Ave, Taraval Street, Sloat Blvd., 19th Ave, Park Presidio Blvd., West Portal Ave., Junipero Serra Blvd., **Church Street**, Divisadero Street, 17th and Market/Castro, and Van Ness Ave.*

Within the Housing Element document and re-zoning recommendations, the Planning Department lists Church Street (and the areas immediately adjacent) not only as an area for rezoning, but specifically as an area “allowing midrise multi-family near transit”. The document goes further to define midrise multi-family near transit to mean “increase height between 55’-85’ around select group of routes within one or two blocks, or certain NC corridors”. Yet the map highlights the area for the rezoning along Church Street begins at 21st street and ending at Cesar Chavez. (See exhibit F). This leaves the area north of 21st Street with RM-1 zoning and the area south of Cesar Chavez with **RH-2 and NC-1** zoning (Exhibit G).

If we identify transit as a necessity for densification, how could we exclude 2/3 of Church Street (and the areas immediately adjacent) from rezoning?

Conclusion

Church Street (and the areas immediately adjacent) between 30th Street and Market Street was identified as a High/Highest Resource area in the 2018, 2019 and 2022 Opportunity Map. For reasons that this author cannot explain, Church Street (and the areas immediately adjacent) between of 21st Street and Market, and between 30th street and Cesar Chavez, were reclassified as Moderate Resource areas for the year 2020 and 2021, before regaining their status as High/Highest Resource area in 2022. SFMTA’s J-Church line, which operates along Church Street between 30th and Market and a main north/south public transit line within this part of town and the only rail line. Policy 20 of the Housing Element recommends increasing mid-rise and small multi-family housing types in Well-Resourced Neighborhoods near transit, including along SFMTA Rapid Network and other transit, and throughout lower-density areas, by adopting zoning changes or density bonus programs. Church Street in its entirety

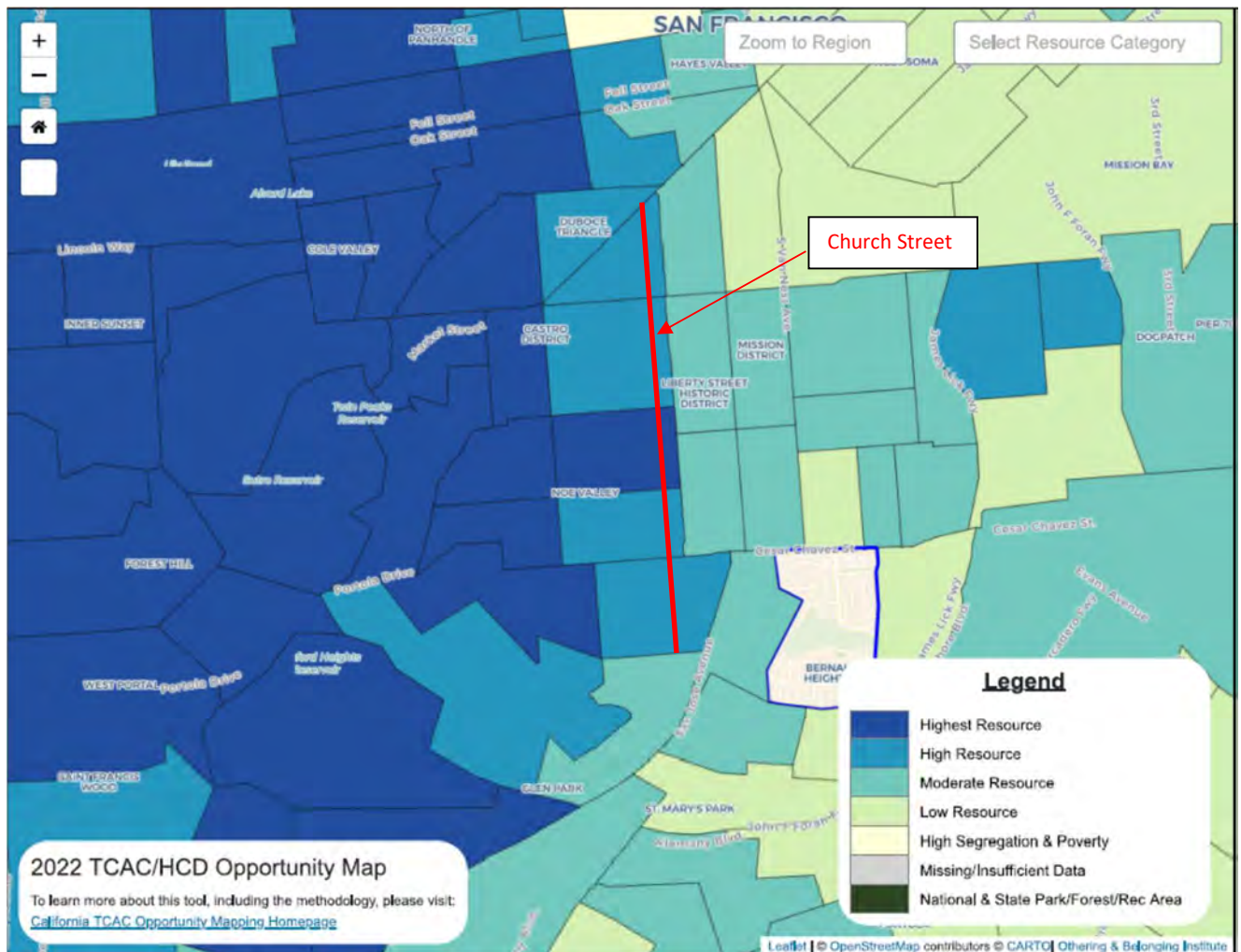
1
Cont'd

meets all criteria under Policy 20, except for a two-year period (2020 and 2021). Unfortunately, Planning is using these years as the base for the rezoning recommendation. This is particularly troubling since the area south of Cesar Chavez and along the J-Church Line, an area well served by Schools, parks, shopping and dining as well as religious institutions, will remain RH-2 or NC-1. The Housing Element is intended to serve as a road map for housing creation with long-term implications through 2031. We should not allow a blip in data to exclude a neighborhood from an opportunity to build more housing along a transit corridor.

Sincerely,

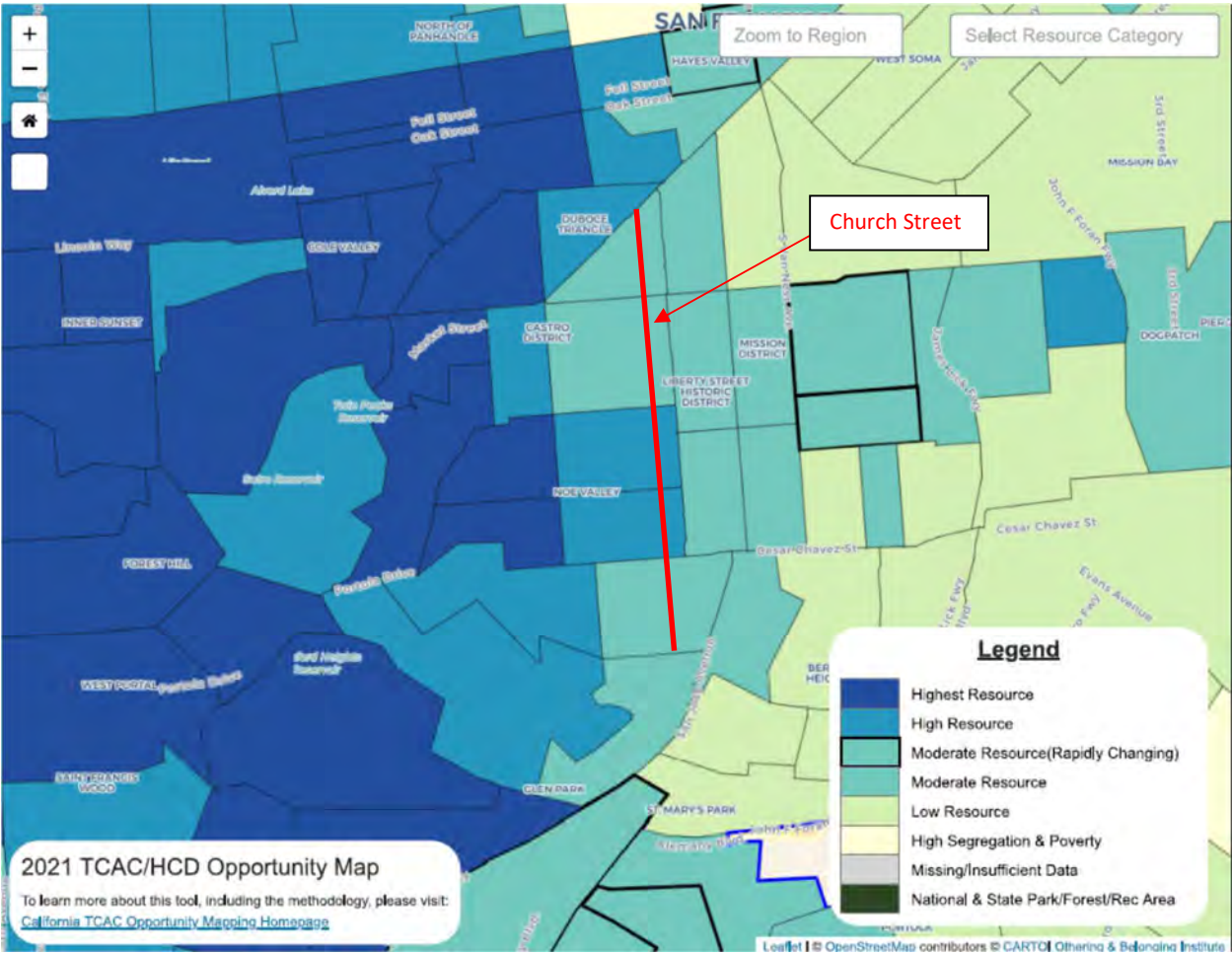
Ty Bash
San Francisco Resident

Exhibit A



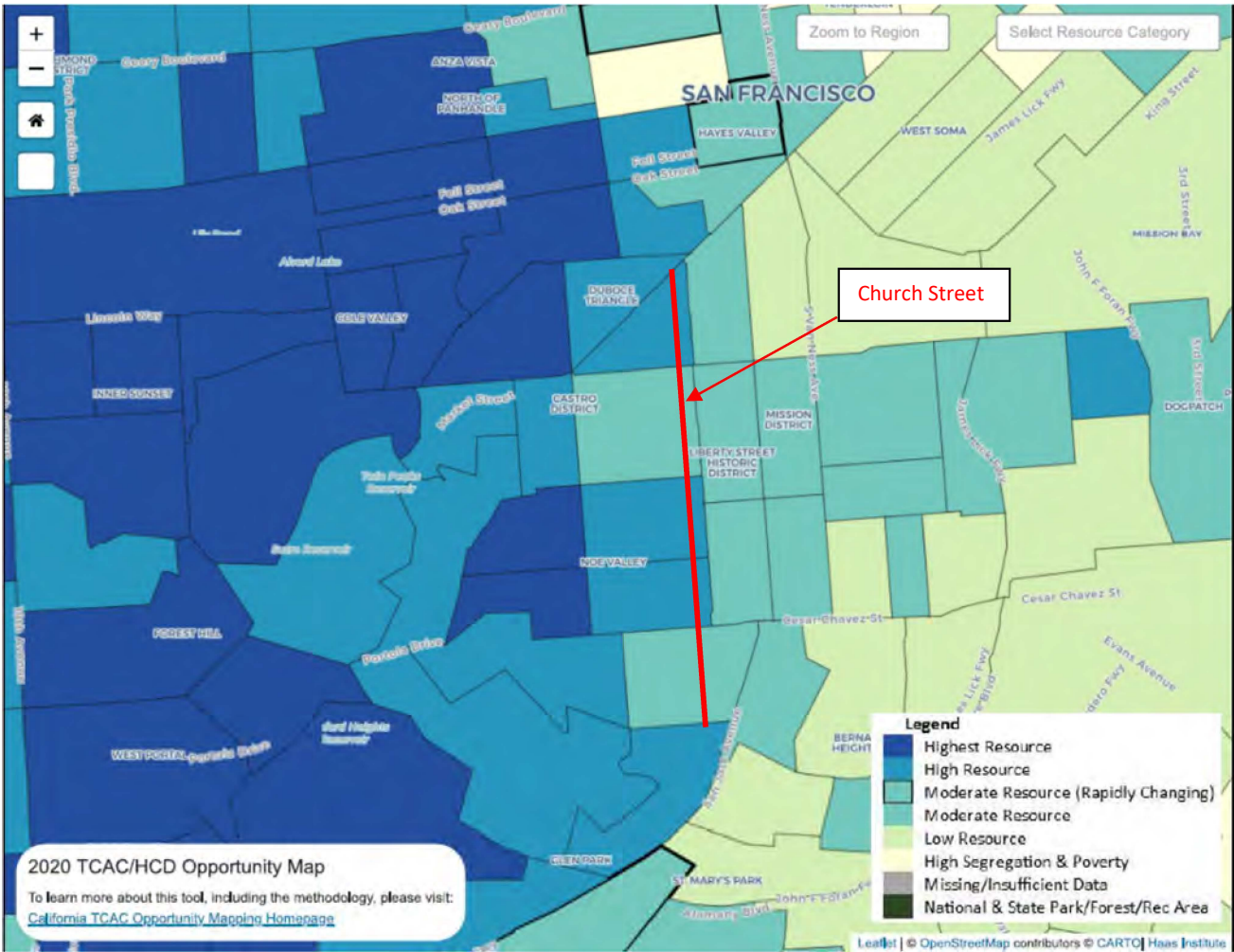
2022 Map – All of Church Street mapped as High/Highest Resource

Exhibit B



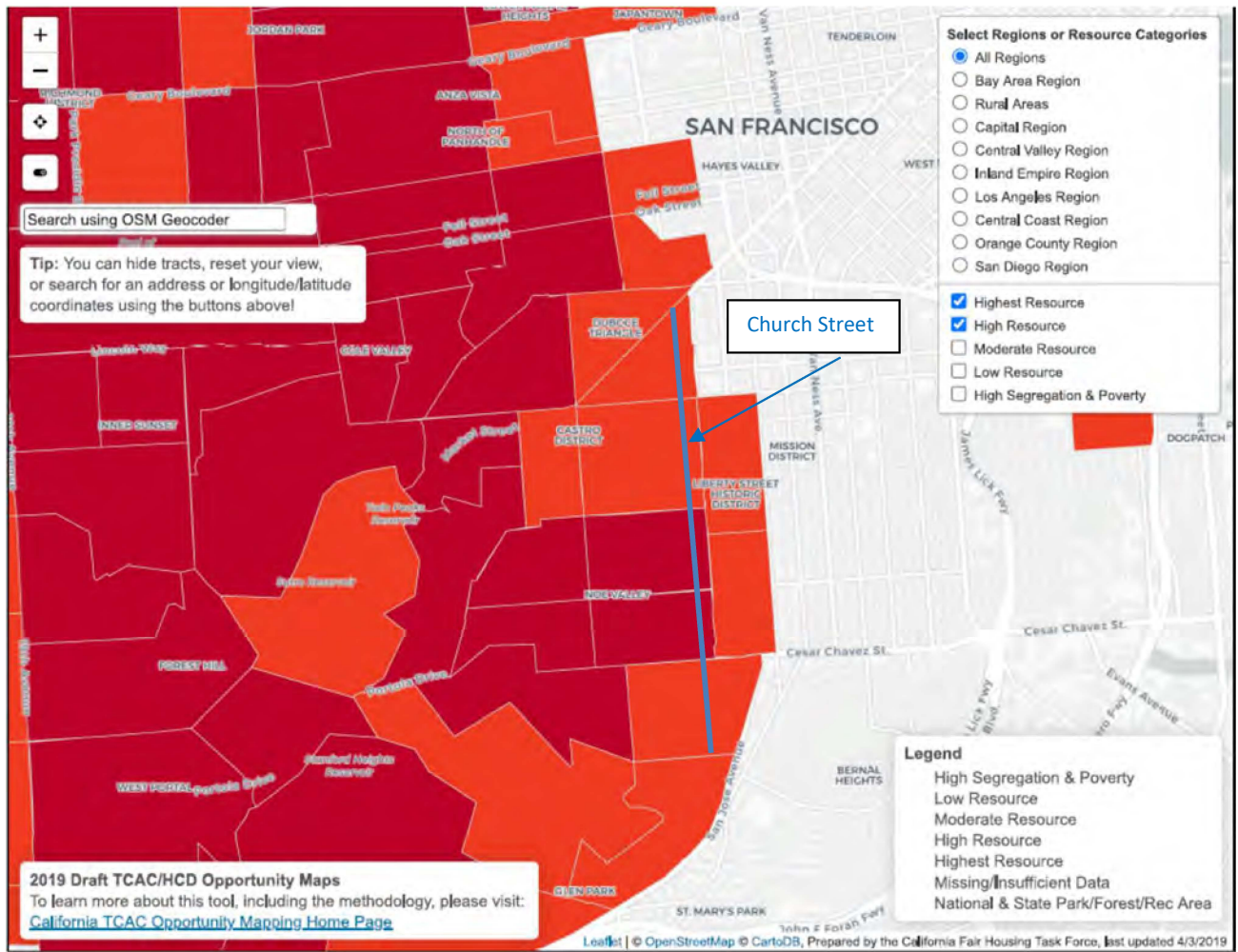
2021 Map

Exhibit C



2020 Map

Exhibit D



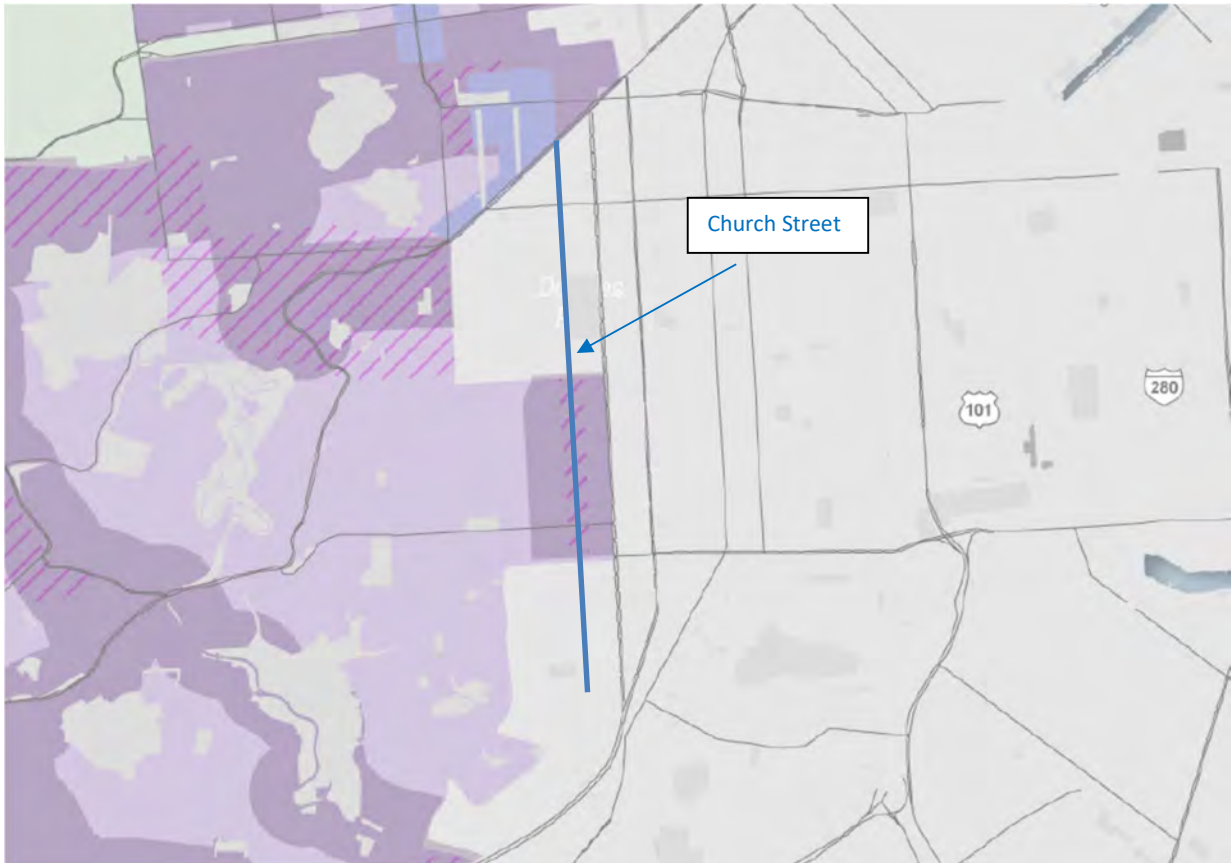
2019 Map – All of Church Street mapped as High/Highest Resource

Exhibit E



2018 Map – All of Church Street mapped as High/Highest Resource

Exhibit F



Area proposed for rezoning

Exhibit G



Zoning Map of area south of Cesar Chavez

From: Jeremy Besmer <info@email.actionnetwork.org>
Sent: Wednesday, June 8, 2022 12:37 PM
To: jonas.ionin@sfgov.org
Subject: Item 2019-016230ENV: plan for 10,000 homes per year by 2031

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

Planning Commission Secretary Jonas Ionin,

1 This Environmental Impact Report is an impact report for outdated housing targets. The report studies alternatives based on Mayor Lee's 2017 goal of building five thousand units per year by 2050, but former Mayor Lee's goal predates our RHNA and even predates the bill that outlined the parameters for calculating RHNA, that bill being Senator Wiener's SB 828. It is difficult to overstate how different these goals are: our RHNA requires ten thousand units per year by 2030, not five thousand units per year by 2050.

While expedient, it is wrong to not study a lawful alternative. Our city is walking blind into the actual environmental effects of accommodating our housing targets, and our city risks blowing all of our affordable housing funding.

Please add an alternative that studies rezoning for over seventy thousand additional units, as our RHNA requires. It is negligent not to.

2 I urge you to address the comments made by UC Davis Professor Chris Elmendorf in his analysis of the draft EIR:
https://url.avanan.click/v2/_https://drive.google.com/file/d/10pIS1Sd6T7FdKBkgd5DD1MbOsEnJgbE1/view_.YXAzOnNmZHQyOmE6bzo2Zjg4NWU3NTE2YmRiYjFiZTI0MGEyZGFhMDU3NGM1Yjo2OmQwODM6OWJhOTY3NzYwMzcyNTAzZTUzNmI2ZWVjNDg0NjUzY2M2Yjg2N2I4MjZhN2RiYTliYjgxN2RkNmQzNmEwY2JlMzp0OIQ

Jeremy Besmer
jdbesmer@gmail.com
1480 Fulton street
San Francisco, California 94117

From: Sarah Boudreau <info@email.actionnetwork.org>
Sent: Wednesday, June 8, 2022 12:18 PM
To: jonas.ionin@sfgov.org
Subject: Item 11 this week: infill housing is GOOD for the environment

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

Planning Commission Secretary Jonas Ionin,

The Draft Environmental Impact Report (topic 2019-016230ENV) does not adequately address the transportation impacts of building more housing, especially on Vehicle Miles Traveled (VMT). Transportation is an important topic because "San Francisco has many more jobs than homes; as a result, workers must commute into San Francisco each day to reach their jobs" (4.1-68). The DEIR further states that "on average, people living or working in San Francisco have lower levels of VMT per capita than people living or working elsewhere in the nine-county San Francisco Bay Area region" (4.4-12). The message is clear that SF commuters impact the environment less than other residents and workers in the Bay Area region. This means that any environmental analysis should also consider the impact of a project and alternatives on the nine-county Bay Area as a whole.

However, the DEIR fails to reflect regional VMT in its analysis of which alternative is environmentally superior. The DEIR claims that the No Project Alternative is environmentally superior because it would construct fewer housing units (S-5); this claim is at odds with the impact of GHG emissions from the No Project Alternative. The DEIR determines that "although regional total daily VMT would increase because of the additional housing, the percentage increase would be less than what would be anticipated if the additional housing were located in an area with per capita VMT that is higher than the regional average." In other words, the No Project Alternative would lead to higher regional VMT and therefore greenhouse gas emissions because it would not decrease the number of workers who commute into San Francisco from areas with higher VMT per capita.

UC Davis Professor Chris Elmendorf has written a letter to the city detailing these concerns in more detail, and I support his comments:

https://url.avanan.click/v2/https://drive.google.com/file/d/10pIS1Sd6T7FdKBkgd5DD1MbOsEnJgbE1/view_.YXAzOnNmZHQyOmE6bzo5YTU1YzBhMjkxZTA1MWNIY2JjMTBkYzU1ZjlxMmExZT02OjM3NGU6ZTM1ZWU4OGExMGE3Y2MxZThiOGY0YzY5NzZhNjRlMmM0NWYwNzU4YTAwN2M0ZjFjOGMwM2ZhMzUwMWJlMzEyMzp0OIQ

The EIR should therefore not refer to the No Project Alternative as the environmentally superior alternative, as doing so fails to recognize the GHG emissions which would result from it. Instead, the DEIR should plan to accommodate over 10,000 new housing units per year to address the climate crisis.

Sarah Boudreau
boudreau.sarah.m@gmail.com
455 25th Avenue, #2
San Francisco, California 94121

From: [Zach Bratun-Glennon](#)
To: [CPC.HousingElementUpdateEIR](#); [Hillis, Rich \(CPC\)](#); [Tanner, Rachael \(CPC\)](#); [Moore, Kathrin \(CPC\)](#); [Diamond, Susan \(CPC\)](#); [Fung, Frank \(CPC\)](#); [Koppel, Joel \(CPC\)](#); [Imperial, Theresa \(CPC\)](#); [Ruiz, Gabriella \(CPC\)](#); [Donovan, Dominica \(BOS\)](#); [Stefani, Catherine \(BOS\)](#)
Subject: UNFAIR Proposal to Increase Building Height in Jordan Park
Date: Tuesday, July 12, 2022 9:00:49 AM

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

Dear Director of Planning Hillis and Planning Commission Members:

I am writing to **express my strong objection to the proposed revision to the building height limitation upward to 85 feet** from the existing limit of 40 feet for Jordan Park as represented by Fig. 2-7 on page 2-25 of the Draft Environmental Impact Report ("EIR") Volume I for the San Francisco Housing Element 2022 Update" of the General Plan.

• One of the guiding principles behind the housing element is that the development of new housing should be balanced fairly given that the west side has not absorbed much of the high density new residential development in the past. Based upon Fig. 2-7, it appears that the area delineated by Clement, Euclid and Pine Streets to the north; Park Presidio to the west; Anza to the South; and Fillmore to the east (the Delineated Area") is being targeted to assume a disproportionate percentage of the 50,000 dwelling units ("D.U.s") that the city is seeking to add by 2050. However, while several other neighborhoods including the Sunset, Noe Valley, Pacific Heights, Presidio Heights, Sea Cliff and the Marina would see more density, they would not be subjected to similar height increases under the proposed plan.

Therefore, **this plan clearly fails to meet its stated objective and standards of "fairness."**

• Certain zones within the Delineated Area are targeted for even more dramatic building height limits of 200 feet (the former Lucky Penny site, for example) and Geary, as a commercial street and major east/west throughfare, is targeted for increased building height limits, which is understandable. However, allowing the height limitation increases to bleed into the neighboring many residential side streets, like Jordan, Commonwealth, Palm and Parker, is not. **The Jordan Park Historic District is eligible for the California Register of Historical Resources under "Criterion C (architecture)."** The proposed height increase would destroy the existing fabric, scale and character of the neighborhood that qualifies it for consideration as a "Historical Resource."

• From more technical viewpoint, as it currently exists, the West Side does not have the infrastructure (e.g. roads, parking, facilities, wastewater capacity, etc.) to bear the burden of the proposed development. For example, while the city plans to add 66 new recreational facilities by 2050, and our neighborhoods are currently well served in this regard, only six of the 66 planned new facilities are to be located in the West Side of the City. Thus, the West Side will be underserved in the future should this plan be realized.

• The proposed changes would **irreparably divide neighborhoods in direct contradiction to one of the stated objectives of the Housing Element. In the section "Impacts and Mitigation Measures" (4.1-19 of the EIR Vol. I). Impact LU-1 dictates that "the proposed actions would not physically divide an established neighborhood."** Specifically, this section states that "the proposed action would not directly or indirectly create any new physical barriers within the city that would divide established neighborhoods." Permitting buildings to be constructed to a height more than twice the height of the existing homes would *directly* and *indirectly* divide Jordan Park! This change would destroy the character of the neighborhood, eliminate vistas into and out of the neighborhood and materially reduce the natural sunlight in the neighborhood! All these impacts are contrary to the stated objectives of the EIR.

The Planning Commission must consider/develop other alternatives and scenarios for how the planned growth and development can be more evenly and equitably distributed throughout the city. Regardless of where they seek to increase the housing stock in the city, no residential side streets should have height limitations as great as 85 feet. This will irreparably damage the urban fabric of our city and the character of our neighborhoods.

Sincerely,

Zachary Bratun-Glennon

146 Parker Ave

From: Jonathan Bunemann <info@email.actionnetwork.org>
Sent: Tuesday, June 7, 2022 12:34 PM
To: CPC-Commissions Secretary <commissions.secretary@sfgov.org>
Subject: Prevent sprawl in the 2022 housing element (file 2019-016230ENV)

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

Planning Commission Staff Commission Affairs,

This Environmental Impact Report fails to recognize the statewide and regional environmental benefits of higher-growth alternatives. On the contrary, the report considers the No Project Alternative environmentally superior as 50,000 less housing units would be planned for (S-5). This couldn't be further detached from reality:

According to a study by Apartment List on 2017 data, the Bay Area and its exurbs had the nation's highest share of super commuters traveling 90 min or more to work. Building less housing units in San Francisco forces people to live in such places where they produce more CO₂, displace wildlife, fill wetlands, bulldoze scenic vistas, disrupt the management of wildfire, and congest highways. Building new housing in San Francisco on the other hand would allow those people to take advantage of our public transit systems and live in energetically efficient multi-family units.

Therefore, I ask you to in particular reconsider Impact GHG-1 for the No Project Alternative to reflect the higher greenhouse gas emissions this alternative would cause, and study rezoning for over eighty thousand additional units, as our RHNA requires, which would have significant positive environmental benefits.

I support Professor Chris Elmendorf's comments on the DEIR:

<https://url.avanan.click/v2/> https://drive.google.com/file/d/10plS1Sd6T7FdKBkgd5DD1MbOsEnJgbE1/view_.YXAzOnNmZHQyOmE6bzphMjU4MTM3ZjcwOWUyYmQ3YzVIY2U4OWUyYTNhZjc5OTo2Oml1ZjU6NDBmYzE0OGI0NjgyYWlwNDNkY2EzZmQ1MGJkMjk4MjlxYzE3MzBjM2I1OTNkN2lyZjE1ODUxZjEyNDJlMjRkNzpo0OIQ

Jonathan Bunemann
jonathanbunemann@gmail.com
1971 Green Street Apt B
San Francisco, California 94123

From: [Linda Burns](#)
 To: [CPC.HousingElementUpdateEIR](#); [Hillis, Rich \(CPC\)](#); [Tanner, Rachael \(CPC\)](#); [Moore, Kathrin \(CPC\)](#); [Diamond, Susan \(CPC\)](#); [Fung, Frank \(CPC\)](#); [Koppel, Joel \(CPC\)](#); [Imperial, Theresa \(CPC\)](#); [Ruiz, Gabriella \(CPC\)](#); [Donovan, Dominica \(BOS\)](#); [Stefani, Catherine \(BOS\)](#)
 Cc: [burns Linda](#)
 Subject: EIR Volume 1
 Date: Sunday, July 10, 2022 1:01:07 PM

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

Dear Director of Planning Hillis and Planning Commission Members:

I am writing to express my objection to the proposed revision to the building height limitation upward to 85 feet from the existing limit of 40 feet for Jordan Park as represented by Fig. 2-7 on page 2-25 of the Draft Environmental Impact Report ("EIR") Volume I for the San Francisco Housing Element 2022 Update" of the General Plan.

<!--[if !supportLists]-->•<!--[endif]-->One of the guiding principles behind the housing element is that the development of new housing should be balanced fairly given that the west side has not absorbed much of the high density new residential development in the past. Based upon Fig. 2-7, it appears that the area delineated by Clement, Euclid and Pine Streets to the north; Park Presidio to the west; Anza to the South; and Fillmore to the east (the Delineated Area") is being targeted to assume a disproportionate percentage of the 50,000 dwelling units ("D.U.s") that the city is seeking to add by 2050. However, while several other neighborhoods including the Sunset, Noe Valley, Pacific Heights, Presidio Heights, Sea Cliff and the Marina would see more density, they would not be subjected to similar height increases under the proposed plan. Therefore, this plan clearly fails to meet its stated objective and standards of "fairness."

<!--[if !supportLists]-->•<!--[endif]-->Certain zones within the Delineated Area are targeted for even more dramatic building height limits of 200 feet (the former Lucky Penny site, for example) and Geary, as a commercial street and major east/west throughfare, is targeted for increased building height limits, which is understandable. However, allowing the height limitation increases to bleed into the neighboring many residential side streets, like Jordan, Commonwealth, Palm and Parker, is not. The Jordan Park Historic District is eligible for the California Register of Historical Resources under "Criterion C (architecture)." The proposed height increase would destroy the existing fabric, scale and character of the neighborhood that qualifies it for consideration as a "Historical Resource."

<!--[if !supportLists]-->•<!--[endif]-->From more technical viewpoint, as it currently exists, the West Side does not have the infrastructure (e.g. roads, parking, facilities, wastewater capacity, etc.) to bear the burden of the proposed development. For example, while the city plans to add 66 new recreational facilities by 2050, and our neighborhoods are currently well served in this regard, only six of the 66 planned new facilities are to be located in the West Side of the City. Thus, the West Side will be underserved in the future should this plan be realized.

<!--[if !supportLists]-->•<!--[endif]-->The proposed changes would irreparably divide neighborhoods in direct contradiction to one of the stated objectives of the Housing Element. In the section "Impacts and Mitigation Measures" (4.1-19 of the EIR Vol. I). Impact LU-1 dictates that "the proposed actions would not physically divide an established neighborhood." Specifically, this section states that "the proposed action would not directly or indirectly create any new physical barriers within the city that would divide established neighborhoods." Permitting buildings to be constructed to a height more than twice the height of the existing homes would *directly* and *indirectly* divide Jordan Park! This change would destroy the character of the neighborhood, eliminate vistas into and out of the neighborhood and materially reduce the natural sunlight in the neighborhood! All these impacts are contrary to the stated objectives of the EIR.

The Planning Commission must consider/develop other alternatives and scenarios for how the planned growth and development can be more evenly and equitably distributed throughout the city. Regardless of where they seek to increase the housing stock in the city, no residential side streets should have height limitations as great as 85 feet. This will irreparably damage the urban fabric of our city and the character of our neighborhoods.

Sincerely,

Linda and Tom Burns

From: Michael Chen <info@email.actionnetwork.org>
Sent: Wednesday, June 8, 2022 10:49 AM
To: jonas.ionin@sfgov.org
Subject: Item 11: oppose Draft EIR unless amended

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

Planning Commission Secretary Jonas Ionin,

1 This Environmental Impact Report does not fully accommodate San Francisco's RHNA requirements. The DEIR seeks to satisfy Mayor Ed Lee's 2017 goal of producing 5,000 homes per year through 2050. But San Francisco's 2023-2030 RHNA is 82,069 units, which is roughly 10,000 homes per year. The DEIR's sites inventory report attempts to make up for this gap by rezoning for 20,000 units "above baseline," but this figure makes the faulty assumption that all units in the pipeline will actually become housing. To the contrary, Professor David Broockman's comment letter indicates that, based on the historical rate at which pipeline units turn into actual housing, San Francisco would need to rezone for 70,000 units above-baseline in order for the necessary inventory to actually come into existence.

2 By not fully accommodating San Francisco's RHNA, the DEIR sets San Francisco up for an enormous headache. Undershooting on the EIR would put an upper limit on the number of units produced by the city's housing element. This bind, in turn, would give the California HCD ground to reject the city's pipeline/status-quo capacity analysis. In the best case scenario, SF Planning would need to redo the requisite environmental review for a compliant plan prior to the deadline on a very limited time frame. This would mean long nights and early mornings struggling to meet a difficult deadline, and it would be unlikely to put SF Planning staff in a position to do their best work. In the worst case scenario, the city would be unable to meet the deadline altogether, thus falling out of compliance, losing affordable housing funds, and being exposed to the builder's remedy.

3 This course of events is still avertable. If the Planning Department writes an EIR for the proper number of units, San Francisco would be put in a much stronger position to pass a compliant housing element and avoid the consequences of being found out of compliance.

4 I urge you to read the DEIR comments written by Professor Chris Elmendorf:
https://url.avanan.click/v2/https://drive.google.com/file/d/10pIS1Sd6T7FdKBkgd5DD1MbOsEnJgbE1/view_.YXAzOnNmZHQyOmE6bzpiMGI3MmRmYjE1YWlyMTU1MjAyNjg0NDY4ZDhIZDZhNjo2OjE5NTE6ODMzMjAzYmZjMGQ3ZjlyODIxMjJjYzgzZGFhZGY0NGFhNjNkODUyMzMxMTY4MmZmNTY1NGEyN2QzM5OTVhYjYp0OIQ

Michael Chen
mychen10@yahoo.com
 1688 Pine St Unit W1004
 San Francisco, California 94109

From: [George Chintala](#)
To: [Hillis, Rich \(CPC\)](#); [Tanner, Rachael \(CPC\)](#); [Moore, Kathrin \(CPC\)](#); [Diamond, Susan \(CPC\)](#); [Fung, Frank \(CPC\)](#); [Koppel, Joel \(CPC\)](#); [Imperial, Theresa \(CPC\)](#); [Ruiz, Gabriella \(CPC\)](#); [Donovan, Dominica \(BOS\)](#); [Stefani, Catherine \(BOS\)](#); [CPC.HousingElementUpdateEIR](#)
Cc: [George Chintala](#)
Subject: Housing Element RIR Vol. I
Date: Tuesday, July 12, 2022 5:14:33 PM

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

Dear Director of Planning Hillis and Planning Commission Members:

I am writing to express my objection to the proposed revision to the building height limitation upward to 85 feet from the existing limit of 40 feet for Jordan Park as represented by Fig. 2-7 on page 2-25 of the Draft Environmental Impact Report ("EIR") Volume I for the San Francisco Housing Element 2022 Update" of the General Plan.

- One of the guiding principles behind the housing element is that the development of new housing should be balanced fairly given that the west side has not absorbed much of the high density new residential development in the past. Based upon Fig. 2-7, it appears that the area delineated by Clement, Euclid and Pine Streets to the north; Park Presidio to the west; Anza to the South; and Fillmore to the east (the Delineated Area") is being targeted to assume a disproportionate percentage of the 50,000 dwelling units ("D.U.s") that the city is seeking to add by 2050. However, while several other neighborhoods including the Sunset, Noe Valley, Pacific Heights, Presidio Heights, Sea Cliff and the Marina would see more density, they would not be subjected to similar height increases under the proposed plan. Therefore, this plan clearly fails to meet its stated objective and standards of "fairness."
- Certain zones within the Delineated Area are targeted for even more dramatic building height limits of 200 feet (the former Lucky Penny site, for example) and Geary, as a commercial street and major east/west throughfare, is targeted for increased building height limits, which is understandable. However, allowing the height limitation increases to bleed into the neighboring many residential side streets, like Jordan, Commonwealth, Palm and Parker, is not. The Jordan Park Historic District is eligible for the California Register of Historical Resources under "Criterion C (architecture)." The proposed height increase would destroy the existing fabric, scale and character of the neighborhood that qualifies it for consideration as a "Historical Resource."
- From more technical viewpoint, as it currently exists, the West Side does not have the infrastructure (e.g. roads, parking, facilities, wastewater capacity, etc.) to bear the burden of the proposed development. For example, while the city plans to add 66 new recreational facilities by 2050, and our neighborhoods are currently well served in this regard, only six of the 66 planned new facilities are to be located in the West Side of the City. Thus, the West Side will be underserved in the future should this plan be realized.
- The proposed changes would irreparably divide neighborhoods in direct contradiction to one of the stated objectives of the Housing Element. In the section "Impacts and Mitigation Measures" (4.1-19 of the EIR Vol. I). Impact LU-1 dictates that "the proposed actions would not physically divide an established neighborhood." Specifically, this section states that "the proposed action would not directly or indirectly create any new physical barriers within the city that would divide established neighborhoods." Permitting buildings to be constructed to a height more than twice the height of the existing homes would *directly* and *indirectly* divide Jordan Park! This change would destroy the character of the neighborhood, eliminate vistas into and out of the neighborhood and materially reduce the natural sunlight in the neighborhood! All these impacts are contrary to the stated objectives of the EIR.

The Planning Commission must consider/develop other alternatives and scenarios for how the planned growth and development can be more evenly and equitably distributed throughout the city. Regardless of where they seek to increase the housing stock in the city, no residential side streets should have height limitations as great as 85 feet. This will irreparably damage the urban fabric of our city and the character of our neighborhoods.

Sincerely,

George Chintala

32 Parker Avenue
34 Parker Avenue

From: [Linda Kang](#)
To: [CPC.HousingElementUpdateEIR](#); [Hillis, Rich \(CPC\)](#); [Tanner, Rachael \(CPC\)](#); [Moore, Kathrin \(CPC\)](#); [Diamond, Susan \(CPC\)](#); [Fung, Frank \(CPC\)](#); [Koppel, Joel \(CPC\)](#); [Imperial, Theresa \(CPC\)](#); [Ruiz, Gabriella \(CPC\)](#); [Donovan, Dominica \(BOS\)](#); [Stefani, Catherine \(BOS\)](#)
Subject: Objection to proposed revision to the building height limit in Jordan Park
Date: Monday, July 11, 2022 9:32:51 PM

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

Dear Director of Planning Hillis and Planning Commission Members:

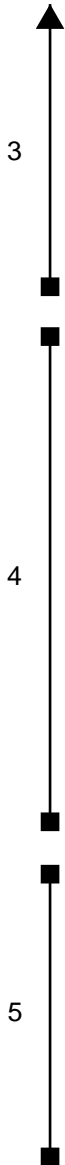
I am writing to express my objection to the proposed revision to the building height limitation upward to 85 feet from the existing limit of 40 feet for Jordan Park as represented by Fig. 2-7 on page 2-25 of the Draft Environmental Impact Report ("EIR") Volume I for the San Francisco Housing Element 2022 Update" of the General Plan.

That's more than double what is allowed now.

• One of the guiding principles behind the housing element is that the development of new housing should be balanced fairly given that the west side has not absorbed much of the high density new residential development in the past. Based upon Fig. 2-7, it appears that the area delineated by Clement, Euclid and Pine Streets to the north; Park Presidio to the west; Anza to the South; and Fillmore to the east (the Delineated Area") is being targeted to assume a disproportionate percentage of the 50,000 dwelling units ("D.U.s") that the city is seeking to add by 2050. However, while several other neighborhoods including the Sunset, Noe Valley, Pacific Heights, Presidio Heights, Sea Cliff and the Marina would see more density, they would not be subjected to similar height increases under the proposed plan. Therefore, this plan clearly fails to meet its stated objective and standards of "fairness."

• Certain zones within the Delineated Area are targeted for even more dramatic building height limits of 200 feet (the former Lucky Penny site, for example) and Geary, as a commercial street and major east/west thoroughfare, is targeted for increased building height limits, which is understandable. However, allowing the height limitation increases to bleed into the neighboring many residential side streets, like Jordan, Commonwealth, Palm and Parker, is not. The Jordan Park Historic District is eligible for the California Register of Historical Resources under "Criterion C (architecture)." The proposed height increase would destroy the existing fabric, scale and character of the neighborhood that qualifies it for consideration as a "Historical Resource."

• From more technical viewpoint, as it currently exists, the West Side does not have the infrastructure (e.g. roads, parking, facilities,



wastewater capacity, etc.) to bear the burden of the proposed development.

For example, while the city plans to add 66 new recreational facilities by 2050, and our neighborhoods are currently well served in this regard, only six of the 66 planned new facilities are to be located in the West Side of the City. Thus, the West Side will be underserved in the future should this plan be realized.

- The proposed changes would irreparably divide neighborhoods in direct contradiction to one of the stated objectives of the Housing Element. In the section “Impacts and Mitigation Measures” (4.1-19 of the EIR Vol. I). Impact LU-1 dictates that “the proposed actions would not physically divide an established neighborhood.” Specifically, this section states that “the proposed action would not directly or indirectly create any new physical barriers within the city that would divide established neighborhoods.” Permitting buildings to be constructed to a height more than twice the height of the existing homes would directly and indirectly divide Jordan Park! This change would destroy the character of the neighborhood, eliminate vistas into and out of the neighborhood and materially reduce the natural sunlight in the neighborhood! All these impacts are contrary to the stated objectives of the EIR.

The Planning Commission must consider/develop other alternatives and scenarios for how the planned growth and development can be more evenly and equitably distributed throughout the city. Regardless of where they seek to increase the housing stock in the city, no residential side streets should have height limitations as great as 85 feet. This will irreparably damage the urban fabric of our city and the character of our neighborhoods.

Linda Chong
D2 resident

From: [Chong Beverly F. Hom](#)
 To: [CPC.HousingElementUpdateEIR](#)
 Subject: STRONG OBJECTION to Increased Building Height Limit
 Date: Sunday, July 10, 2022 11:55:30 AM

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

Dear Director of Planning Hillis and Planning Commission Members:

I am writing to express my objection to the proposed revision to the building height limitation upward to 85 feet from the existing limit of 40 feet for Jordan Park as represented by Fig. 2-7 on page 2-25 of the Draft Environmental Impact Report ("EIR") Volume I for the San Francisco Housing Element 2022 Update" of the General Plan.

<!--[if !supportLists]-->•<!--[endif]-->One of the guiding principles behind the housing element is that the development of new housing should be balanced fairly given that the west side has not absorbed much of the high density new residential development in the past. Based upon Fig. 2-7, it appears that the area delineated by Clement, Euclid and Pine Streets to the north; Park Presidio to the west; Anza to the South; and Fillmore to the east (the Delineated Area") is being targeted to assume a disproportionate percentage of the 50,000 dwelling units ("D.U.s") that the city is seeking to add by 2050. However, while several other neighborhoods including the Sunset, Noe Valley, Pacific Heights, Presidio Heights, Sea Cliff and the Marina would see more density, they would not be subjected to similar height increases under the proposed plan. Therefore, this plan clearly fails to meet its stated objective and standards of "fairness."

<!--[if !supportLists]-->•<!--[endif]-->Certain zones within the Delineated Area are targeted for even more dramatic building height limits of 200 feet (the former Lucky Penny site, for example) and Geary, as a commercial street and major east/west throughfare, is targeted for increased building height limits, which is understandable. However, allowing the height limitation increases to bleed into the neighboring many residential side streets, like Jordan, Commonwealth, Palm and Parker, is not. The Jordan Park Historic District is eligible for the California Register of Historical Resources under "Criterion C (architecture)." The proposed height increase would destroy the existing fabric, scale and character of the neighborhood that qualifies it for consideration as a "Historical Resource."

<!--[if !supportLists]-->•<!--[endif]-->From more technical viewpoint, as it currently exists, the West Side does not have the infrastructure (e.g. roads, parking, facilities, wastewater capacity, etc.) to bear the burden of the proposed development. For example, while the city plans to add 66 new recreational facilities by 2050, and our neighborhoods are currently well served in this regard, only six of the 66 planned new facilities are to be located in the West Side of the City. Thus, the West Side will be underserved in the future should this plan be realized.

<!--[if !supportLists]-->•<!--[endif]-->The proposed changes would irreparably divide neighborhoods in direct contradiction to one of the stated objectives of the Housing Element. In the section "Impacts and Mitigation Measures" (4.1-19 of the EIR Vol. I). Impact LU-1 dictates that "the proposed actions would not physically divide an established neighborhood." Specifically, this section states that "the proposed action would not directly or indirectly create any new physical barriers within the city that would divide established neighborhoods." Permitting buildings to be constructed to a height more than twice the height of the existing homes would *directly* and *indirectly* divide Jordan Park! This change would destroy the character of the neighborhood, eliminate vistas into and out of the neighborhood and materially reduce the natural sunlight in the neighborhood! All these impacts are contrary to the stated objectives of the EIR.

The Planning Commission must consider/develop other alternatives and scenarios for how the planned growth and development can be more evenly and equitably distributed throughout the city. Regardless of where they seek to increase the housing stock in the city, no residential side streets should have height limitations as great as 85 feet. This will irreparably damage the urban fabric of our city and the character of our neighborhoods.

Sincerely,

Richard & Beverly Chong

176 Jordan Ave

From: Scot Conner <scot.conner@berkeley.edu>
Sent: Wednesday, June 8, 2022 12:21 PM
To: jonas.ionin@sfgov.org
Subject: Item 2019-016230ENV: plan for 10,000 homes per year by 2031

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

Planning Commission Secretary Jonas Ionin,

1 This Environmental Impact Report is an impact report for outdated housing targets. The report studies alternatives based on Mayor Lee's 2017 goal of building five thousand units per year by 2050, but former Mayor Lee's goal predates our RHNA and even predates the bill that outlined the parameters for calculating RHNA, that bill being Senator Wiener's SB 828. It is difficult to overstate how different these goals are: our RHNA requires ten thousand units per year by 2030, not five thousand units per year by 2050.

While expedient, it is wrong to not study a lawful alternative. Our city is walking blind into the actual environmental effects of accommodating our housing targets, and our city risks blowing all of our affordable housing funding.

Please add an alternative that studies rezoning for over seventy thousand additional units, as our RHNA requires. It is negligent not to.

2 I urge you to address the comments made by UC Davis Professor Chris Elmendorf in his analysis of the draft EIR:
<https://url.avanan.click/v2/> https://drive.google.com/file/d/10pIS1Sd6T7FdKBkgd5DD1MbOsEnJgbE1/view_.YXAzOnNmZHQyOmE6bzpiZThiMzViMDQ5ZDk0NjhkMjg5NjE3NDMzZDY1NjEyNjo2OjgwMDA6OWM2MjdNz4ZmVkODkwZWZmMjE5NzY0NDE2NThiMWI0ZTM4NDImMmRIOTg0NmNiODU2MjFkNjU1MmViYjQ4Zjp0OIQ

Scot Conner
scot.conner@berkeley.edu
1671 Greenwich Street
San Francisco, California 94123

From: [Sam Cuddeback](#)
To: [CPC.HousingElementUpdateEIR](#); [Hillis, Rich \(CPC\)](#); [Tanner, Rachael \(CPC\)](#); [Moore, Kathrin \(CPC\)](#); [Diamond, Susan \(CPC\)](#); [Fung, Frank \(CPC\)](#); [Koppel, Joel \(CPC\)](#); [theresa.imperial@sfgov.org](#); [Ruiz, Gabriella \(CPC\)](#); [Donovan, Dominica \(BOS\)](#)
Cc: [Owen L. Hart](#)
Subject: A Jordan Park resident's concern re: draft plan for change in building height
Date: Thursday, June 16, 2022 4:53:46 PM

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

Dear Commissioners, Aides and Officials:

1 Having just learned that there is an important plan to change and lessen significantly the height restrictions for buildings in the area around parts of Jordan Park and other neighborhoods, I request a delay of the current June 20 deadline for comment. I have just become aware of this proposed change, and I have not had any chance to review it. I am sure hundreds -if not thousands - of other citizens are in a similar situation. I believe the document is the proposed height limit / zoning changes in the draft EIR Impact Report, Volume 1.

Please extend the deadline for input. This proposal would have a huge, detrimental impact on one of the vital neighborhoods in our city. Certainly, we need to share the load of expanding density, but I need time to understand whether or not this plan, as it is written is too aggressive in that effort.

Thank you for your consideration.

Sam Cuddeback
187 Jordan Avenue

From: Salim Damerdji <info@email.actionnetwork.org>

Sent: Wednesday, June 8, 2022 10:43 AM

To: jonas.ionin@sfgov.org

Subject: Hearing item 11: take our housing goals seriously in the Draft EIR

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

Planning Commission Secretary Jonas Ionin,

This Environmental Impact Report does not fully accommodate San Francisco's RHNA requirements. The DEIR seeks to satisfy Mayor Ed Lee's 2017 goal of producing 5,000 homes per year through 2050. But San Francisco's 2023-2030 RHNA is 82,069 units, which is roughly 10,000 homes per year. The DEIR's sites inventory report attempts to make up for this gap by rezoning for 20,000 units "above baseline," but this figure makes the faulty assumption that all units in the pipeline will actually become housing. To the contrary, Professor David Broockman's comment letter indicates that, based on the historical rate at which pipeline units turn into actual housing, San Francisco would need to rezone for 70,000 units above-baseline in order for the necessary inventory to actually come into existence.

By not fully accommodating San Francisco's RHNA, the DEIR sets San Francisco up for an enormous headache. Undershooting on the EIR would put an upper limit on the number of units produced by the city's housing element. This bind, in turn, would give the California HCD ground to reject the city's pipeline/status-quo capacity analysis. In the best case scenario, SF Planning would need to redo the requisite environmental review for a compliant plan prior to the deadline on a very limited time frame. This would mean long nights and early mornings struggling to meet a difficult deadline, and it would be unlikely to put SF Planning staff in a position to do their best work. In the worst case scenario, the city would be unable to meet the deadline altogether, thus falling out of compliance, losing affordable housing funds, and being exposed to the builder's remedy.

This course of events is still avertable. If the Planning Department writes an EIR for the proper number of units, San Francisco would be put in a much stronger position to pass a compliant housing element and avoid the consequences of being found out of compliance.

I urge you to heed the DEIR comments written by Professor Chris Elmendorf:

https://url.avanan.click/v2/_https://drive.google.com/file/d/10pIS1Sd6T7FdKBkgd5DD1MbOsEnJgbE1/view_.YXAzOnNmZHQyOmE6bzphMmFjMjUxZDVkNzlyMzVhNDRkZDk2OTcwMDAxMmRmMjo2OjdiOTE6YWVhNzIzMzFjYWVhMDVlZmEwNjg2MzQzYjcyMGI2YjMwZTBhMGI3YWQ4ZGU3MjdlZDYyZjE2YTExODg5YWRIp0OIQ

Salim Damerdji

sdamerdji1@gmail.com

255 S Rengstorff Ave Apt 164

Mountain View, California 94040

From: Andrew Day <info@email.actionnetwork.org>
Sent: Thursday, June 9, 2022 9:28 AM
To: CPC-Commissions Secretary <commissions.secretary@sfgov.org>
Subject: Hearing item 11: take our housing goals seriously in the Draft EIR

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

Planning Commission Staff Commission Affairs,

This Environmental Impact Report does not fully accommodate San Francisco's RHNA requirements. The DEIR seeks to satisfy Mayor Ed Lee's 2017 goal of producing 5,000 homes per year through 2050. But San Francisco's 2023-2030 RHNA is 82,069 units, which is roughly 10,000 homes per year. The DEIR's sites inventory report attempts to make up for this gap by rezoning for 20,000 units "above baseline," but this figure makes the faulty assumption that all units in the pipeline will actually become housing. To the contrary, Professor David Broockman's comment letter indicates that, based on the historical rate at which pipeline units turn into actual housing, San Francisco would need to rezone for 70,000 units above-baseline in order for the necessary inventory to actually come into existence.

By not fully accommodating San Francisco's RHNA, the DEIR sets San Francisco up for an enormous headache. Undershooting on the EIR would put an upper limit on the number of units produced by the city's housing element. This bind, in turn, would give the California Department of Housing and Community Development grounds to reject the city's pipeline/status-quo capacity analysis. In the best case scenario, SF Planning would need to redo the requisite environmental review for a compliant plan prior to the deadline on a very limited time frame. This would mean long nights and early mornings for city staffers struggling to meet a difficult deadline, and it would be unlikely to put SF Planning staff in a position to do their best work. In the worst case scenario, the city would be unable to meet the deadline altogether, thus falling out of compliance—losing eligibility for affordable housing funds, and possibly even losing land use authority.

This course of events is still avertable. If the Planning Department writes an EIR for the proper number of units, San Francisco would be put in a much stronger position to pass a compliant housing element and avoid the consequences of being found out of compliance.

I urge you to heed the DEIR comments written by Professor Chris Elmendorf:

<https://url.avanan.click/v2/> https://drive.google.com/file/d/10pIS1Sd6T7FdKBkgd5DD1MbOsEnJgbE1/view_.YXAzOnNmZHQyOmE6bzpiOWM5YmZiOTVIOGQwZTU1MjAyMTIyNmI3YjQ2MGU4Mzo2OmRiZjU6NDJmMzk4OTBiZTFhODBhODM3ZDhkOWI5NzQ2YmE1NjAzMzMzYWQ3MGNIY2I5MzliNGU3YWQwM2QyMDRmNmI2Nz0OIQ

Andrew Day
aday.nu@gmail.com
 1366 Turk St, 7c
 San Francisco , California 94115

From: Joseph DiMento <info@email.actionnetwork.org>
Sent: Wednesday, June 8, 2022 3:18 PM
To: jonas.ionin@sfgov.org
Subject: Prevent sprawl in the 2022 housing element (file 2019-016230ENV)

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

Planning Commission Secretary Jonas Ionin,

This Environmental Impact Report fails to recognize the statewide and regional environmental benefits of higher-growth alternatives. On the contrary, the report considers the No Project Alternative environmentally superior as 50,000 less housing units would be planned for (S-5). This couldn't be further detached from reality:

According to a study by Apartment List on 2017 data, the Bay Area and its exurbs had the nation's highest share of super commuters traveling 90 min or more to work. Building less housing units in San Francisco forces people to live in such places where they produce more CO2, displace wildlife, fill wetlands, bulldoze scenic vistas, disrupt the management of wildfire, and congest highways. Building new housing in San Francisco on the other hand would allow those people to take advantage of our public transit systems and live in energetically efficient multi-family units.

Therefore, I ask you to in particular reconsider Impact GHG-1 for the No Project Alternative to reflect the higher greenhouse gas emissions this alternative would cause, and study rezoning for over eighty thousand additional units, as our RHNA requires, which would have significant positive environmental benefits.

I support Professor Chris Elmendorf's comments on the DEIR:

<https://url.avanan.click/v2/> https://drive.google.com/file/d/10plS1Sd6T7FdKBkgd5DD1MbOsEnJgbE1/view_.YXAzOnNmZHQyOmE6bzpjODE1YTJhMTdjZjhkY2NIYTU4N2UyNTIyYWMxZmNjMDo2OjY0OWI6MmJmM2NiYjExNzZhZjBjMWU4NGJkODAwYjU0ODgwNDY4MmM4NGUyMTIIZDIxNjMwMDVmNWNmMGE5YjhIMjQ3MDp0OIQ

Joseph DiMento
joedimento@gmail.com
425 beacon street
San Francisco, California 94131

From: [E.F](#)
To: [CPC.HousingElementUpdateEIR](#)
Subject: Citizen feedback
Date: Friday, June 10, 2022 5:20:19 PM

I-Ed

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

■ I do not buy the argument that increased housing stock translates into lower priced housing.

1 I do know that the the low density feel of the Japantown and the entire west side is its charm.

■ Put new housing in areas needing redevelopment and reuse, not in established residential areas. Create new neighborhoods.

Ed

From: [Jessica Eisler](#)
To: [CPC.HousingElementUpdateEIR](#)
Cc: [Jessica Eisler](#); [Hillis, Rich \(CPC\)](#); [Tanner, Rachael \(CPC\)](#); [Fung, Frank \(CPC\)](#); [Koppel, Joel \(CPC\)](#); [Imperial, Theresa \(CPC\)](#); [Ruiz, Gabriella \(CPC\)](#); [Donovan, Dominica \(BOS\)](#); [Stefani, Catherine \(BOS\)](#); [Diamond, Susan \(CPC\)](#); [Moore, Kathrin \(CPC\)](#)
Subject: JPAI EIR
Date: Friday, July 8, 2022 7:55:07 AM

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

Dear Director of Planning Hillis and Planning Commission Members:

I am writing to express my objection to the proposed revision to the building height limitation upward to 85 feet from the existing limit of 40 feet for Jordan Park as represented by Fig. 2-7 on page 2-25 of the Draft Environmental Impact Report ("EIR") Volume I for the San Francisco Housing Element 2022 Update" of the General Plan.

• One of the guiding principles behind the housing element is that the development of new housing should be balanced fairly given that the west side has not absorbed much of the high density new residential development in the past. Based upon Fig. 2-7, it appears that the area delineated by Clement, Euclid and Pine Streets to the north; Park Presidio to the west; Anza to the South; and Fillmore to the east (the Delineated Area") is being targeted to assume a disproportionate percentage of the 50,000 dwelling units ("D.U.s") that the city is seeking to add by 2050. However, while several other neighborhoods including the Sunset, Noe Valley, Pacific Heights, Presidio Heights, Sea Cliff and the Marina would see more density, they would not be subjected to similar height increases under the proposed plan. Therefore, this plan clearly fails to meet its stated objective and standards of "fairness."

• Certain zones within the Delineated Area are targeted for even more dramatic building height limits of 200 feet (the former Lucky Penny site, for example) and Geary, as a commercial street and major east/west throughfare, is targeted for increased building height limits, which is understandable. However, allowing the height limitation increases to bleed into the neighboring many residential side streets, like Jordan, Commonwealth, Palm and Parker, is not. The Jordan Park Historic District is eligible for the California Register of Historical Resources under "Criterion C (architecture)." The proposed height increase would destroy the existing fabric, scale and character of the neighborhood that qualifies it for consideration as a "Historical Resource."

• From a more technical viewpoint, as it currently exists, the West Side does not have the infrastructure (e.g. roads, parking, facilities, wastewater capacity, etc.) to bear the burden of the proposed development. For example, while the city plans to add 66 new recreational facilities by 2050, and our neighborhoods are currently well served in this regard, only six of the 66 planned new facilities are to be located in the West Side of the City. Thus, the West Side will be underserved in the future should this plan be realized.

4 • The proposed changes would irreparably divide neighborhoods in direct contradiction to one of the stated objectives of the Housing Element. In the section “Impacts and Mitigation Measures” (4.1-19 of the EIR Vol. I). Impact LU-1 dictates that “the proposed actions would not physically divide an established neighborhood.” Specifically, this section states that “the proposed action would not directly or indirectly create any new physical barriers within the city that would divide established neighborhoods.” Permitting buildings to be constructed to a height more than twice the height of the existing homes would directly and indirectly divide Jordan Park! This change would destroy the character of the neighborhood, eliminate vistas into and out of the neighborhood and materially reduce the natural sunlight in the neighborhood! All these impacts are contrary to the stated objectives of the EIR.

5 The Planning Commission must consider/develop other alternatives and scenarios for how the planned growth and development can be more evenly and equitably distributed throughout the city. Regardless of where they seek to increase the housing stock in the city, no residential side streets should have height limitations as great as 85 feet. This will irreparably damage the urban fabric of our city and the character of our neighborhoods.

Sincerely,

Jessica Eisler
140 Commonwealth Ave.
San Francisco CA 94118

From: [michael eisler](#)
To: [CPC.HousingElementUpdateEIR](#); [Hillis, Rich \(CPC\)](#); [Tanner, Rachael \(CPC\)](#); [Moore, Kathrin \(CPC\)](#); [Diamond, Susan \(CPC\)](#); [Fung, Frank \(CPC\)](#); [Koppel, Joel \(CPC\)](#); [Imperial, Theresa \(CPC\)](#); [Ruiz, Gabriella \(CPC\)](#); [Stefani, Catherine \(BOS\)](#); [Donovan, Dominica \(BOS\)](#)
Subject: Jordan Park Height Limits
Date: Friday, July 8, 2022 4:51:36 PM
Attachments: [Jordan Park Housing 7-8-22.docx](#)

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

Dear All-

It would be appreciated if this letter could be read and given consideration prior to making any decision about height limits in the Jordan Park neighborhood.

Thank you and hope you are all having a nice summer.

Best regards,

Michael Eisler
140 Commonwealth Avenue

Michael Eisler
140 Commonwealth Avenue
San Francisco, CA 94118

July 8, 2022

Dear Director of Planning Hillis and Planning Commission Members:

I am writing to express my objection to the proposed revision to the building height limitation upward to 85 feet from the existing limit of 40 feet for Jordan Park as represented by Fig. 2-7 on page 2-25 of the Draft Environmental Impact Report ("EIR") Volume I for the San Francisco Housing Element 2022 Update" of the General Plan.

- 1 • One of the guiding principles behind the housing element is that the development of new housing should be balanced fairly given that the west side has not absorbed much of the high density new residential development in the past. Based upon Fig. 2-7, it appears that the area delineated by Clement, Euclid and Pine Streets to the north; Park Presidio to the west; Anza to the South; and Fillmore to the east (the Delineated Area") is being targeted to assume a disproportionate percentage of the 50,000 dwelling units ("D.U.s") that the city is seeking to add by 2050. However, while several other neighborhoods including the Sunset, Noe Valley, Pacific Heights, Presidio Heights, Sea Cliff and the Marina would see more density, they would not be subjected to similar height increases under the proposed plan. Therefore, this plan clearly fails to meet its stated objective and standards of "fairness."
- 2 • Certain zones within the Delineated Area are targeted for even more dramatic building height limits of 200 feet (the former Lucky Penny site, for example) and Geary, as a commercial street and major east/west throughfare, is targeted for increased building height limits, which is understandable. However, allowing the height limitation increases to bleed into the neighboring many residential side streets, like Jordan, Commonwealth, Palm and Parker, is not. The Jordan Park Historic District is eligible for the California Register of Historical Resources under "Criterion C (architecture)." The proposed height increase would destroy the existing fabric, scale and character of the neighborhood that qualifies it for consideration as a "Historical Resource."
- 3 • From more technical viewpoint, as it currently exists, the West Side does not have the infrastructure (e.g. roads, parking, facilities, wastewater capacity, etc.) to bear the burden of the proposed development. For example, while the city plans to add 66 new recreational facilities by 2050, and our neighborhoods are currently well served in this regard, only six of the 66 planned new facilities are to be located in the West Side of the City. Thus, the West Side will be underserved in the future should this plan be realized.
- 4 • The proposed changes would irreparably divide neighborhoods in direct contradiction to one of the stated objectives of the Housing Element. In the section "Impacts and Mitigation Measures" (4.1-19 of the EIR Vol. I). Impact LU-1 dictates that "the proposed actions would not physically divide an established neighborhood." Specifically, this section states that "the proposed action would not directly or indirectly create any new physical barriers within the city that would divide established neighborhoods." Permitting buildings to be constructed to a height more than twice the height of the existing homes would *directly* and *indirectly* divide Jordan Park! This change would destroy the character of the neighborhood, eliminate vistas into and out of the neighborhood and materially reduce the natural sunlight in the neighborhood! All these impacts are contrary to the stated objectives of the EIR.

5

The Planning Commission must consider/develop other alternatives and scenarios for how the planned growth and development can be more evenly and equitably distributed throughout the city. Regardless of where they seek to increase the housing stock in the city, no residential side streets should have height limitations as great as 85 feet. This will irreparably damage the urban fabric of our city and the character of our neighborhoods.

Sincerely,

Michael Eisler

Elizabeth White: CPC.HousingElementUpdateEIR@sfgov.org

Rich Hillis, Director of Planning: rich.hillis@sfgov.org

Rachael Tanner, President: Rachael.Tanner@sfgov.org

Kathrin Moore, Vice-President: kathrin.moore@sfgov.org

Sue Diamond, Commissioner: sue.diamond@sfgov.org

Frank S. Fung, Commissioner: frank.fung@sfgov.org

Joel Koppel, Commissioner: joel.koppel@sfgov.org

Theresa Imperial, Commissioner: theresa.imperial@sfgov.org

Gabriella Ruiz, Commissioner: gabriella.ruiz@sfgov.org

Donovan, Dominica, Legislative Aide, Office of Supervisor Catherine Stefani: dominica.donovan@sfgov.org

Supervisor Catherine Stefani: catherine.stefani@sfgov.org

From: [Christopher S. Elmendorf](#)
To: [CPC.HousingElementUpdateEIR](#); [Gluckstein, Lisa \(MYR\)](#); [Tanner, Rachael \(CPC\)](#); [Moore, Kathrin \(CPC\)](#); [Diamond, Susan \(CPC\)](#); [Fung, Frank \(CPC\)](#); [Koppel, Joel \(CPC\)](#); [Imperial, Theresa \(CPC\)](#); [Ruiz, Gabriella \(CPC\)](#); [sohab.mehmood@hcd.ca.gov](#); [Kirkeby, Megan@HCD](#); [Coy, Melinda@HCD](#); [Paul@HCD McDougall](#); [shannan.west@hcd.ca.gov](#)
Subject: comments on draft EIR for SF housing element
Date: Tuesday, May 10, 2022 3:00:59 PM
Attachments: [SF Housing Element DEIR Comments \(Elmendorf\).pdf](#)

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

To Elizabeth White, and others with an interest in San Francisco housing element update—

I am writing to submit comments on the DEIR for San Francisco's 6th cycle housing element. My comments are attached, and also posted online at this [link](#).

My comments outline two “train wreck” scenarios, which can be avoided if the final EIR analyzes alternatives that provide for additional rezoning at the outset of the planning period or via mid-cycle adjustments.

Best,

Chris

Christopher S. Elmendorf

Martin Luther King, Jr. Professor of Law

UC Davis School of Law

May 10, 2022

Elizabeth White, EIR Coordinator
San Francisco Planning Department
49 South Van Ness Ave, Suite 1400
San Francisco, CA 94103

Re: Comments on Draft Environmental Impact Report for San Francisco's Housing Element Update 2022 (Case No. 2019-016230ENV)

Dear Ms. White,

My name is Chris Elmendorf. I am a law professor at UC Davis with expertise in land use and housing law,¹ and a resident of San Francisco. In my personal capacity, I am submitting these comments on the Draft Environmental Impact Report (DEIR) for San Francisco's housing element update. I hope my comments will help the Planning Department to craft a final EIR that supports a robust, fully compliant housing element, and that serves as the foundation for tiered, efficient environmental review of subsequent rezonings and housing approvals.

1. The EIR should report anticipated housing production from 2023-2030 under the preferred and principal alternatives.

The DEIR reasonably elects to use a "future conditions baseline" corresponding to the year 2050 for gauging environmental impacts. However, it should also project housing production through 2030 (the end of the 6th cycle planning period) for the preferred and principal alternatives, so that

¹ Some of my recent and forthcoming publications include:

- Elmendorf, Christopher S. and Timothy Duncheon. Forthcoming. "When Super-Statutes Collide: CEQA, the Housing Accountability Act, and Tectonic Change in Land Use Law." *Ecology Law Quarterly*, Vol. 49, Available at SSRN: <https://ssrn.com/abstract=3980396> or <http://dx.doi.org/10.2139/ssrn.3980396>.
- Kapur, Sidharth, Salim Damerdj, Christopher S. Elmendorf, and Paavo Monkkonen. 2021. "What Gets Built on Sites That Cities "Make Available" for Housing?" (UCLA Lewis Center, Aug. 2021), <https://www.lewis.ucla.edu/research/what-gets-built-on-sites-that-cities-make-available-for-housing/>.
- Elmendorf, Christopher S., Eric Biber, Paavo Monkkonen and Moira O'Neill. 2022. "I Would, If Only I Could' How Cities Can Use California's Housing Element Law to Overcome Neighborhood Resistance to New Housing," *Willamette Law Review*, Available at SSRN: <https://ssrn.com/abstract=3889771> or <http://dx.doi.org/10.2139/ssrn.3889771>
- Elmendorf, Christopher S. Eric Biber, Paavo Monkkonen and Moira O'Neill. 2021. "State Administrative Review of Local Constraints on Housing Development: Improving the California Model." *Arizona Law Review* 63: 609-677 (2021), Available at SSRN: <https://ssrn.com/abstract=3614085> or <http://dx.doi.org/10.2139/ssrn.3614085>.
- Elmendorf, Christopher S. Eric Biber, Paavo Monkkonen and Moira O'Neill. 2020. "Making It Work: Legal Foundations for Administrative Reform of California's Housing Framework." *Ecology Law Quarterly* 47: 973-1060 (2020), Available at SSRN: <https://ssrn.com/abstract=3500139> or <http://dx.doi.org/10.2139/ssrn.3500139>

1
Cont'd

city officials and members of the public can better understand which alternatives comply with state law. Cf. *Sequoyah Hills Homeowners Assn. v. City of Oakland* (1993) 23 Cal.App.4th 704, 715 (“CEQA does not require extended consideration of project alternatives that are not [legally] ‘feasible’”).

At present, as explained in point #2 below, it is doubtful that any alternative in the DEIR is “legally feasible.”

2. The EIR should analyze alternatives that would fully accommodate the city’s RHNA, not just a previously announced mayoral housing goal.

The preferred and principal alternatives in the DEIR appear to be drawn from a study that was undertaken with the goal of achieving former Mayor Ed Lee’s objective of producing 5000 homes/year through 2050.² This goal is repeated fifteen times in the DEIR.

But it was a goal set in 2017, long before the 6th-cycle RHNA numbers were announced and even predating SB 828, the bill which laid the foundation for larger RHNAs. San Francisco’s RHNA for the 2023-2030 planning period (82,069 units) translates into roughly 10,000 units/year, or twice the rate of production contemplated by the preferred and principal alternatives in the DEIR.

2

Can a plan whose stated goal is 5000 units/year be squared with a RHNA calling for twice as much? Only with very dubious assumptions. The draft [Sites Inventory and Rezoning Program](#) (March 2022) makes heroic claims about new units from the city’s “housing pipeline” and sites identified for acquisition by the Mayor’s Office of Housing and Community Development.

On this basis, the sites inventory report concludes that rezoning for merely 20,000 “above baseline” units by 2030—units that would not be built if the regulatory status quo remained in place—will suffice. Yet as the [comment letter](#) from UC Berkeley professor David Broockman and San Francisco YIMBY shows, a historically-ground assessment of pipeline capacity suggests that the city should aim to rezone for about **70,000 above-baseline units by 2030**. (Such actions would also, of course, yield many, many additional homes between 2030 and 2050, much like the contemplated rezoning for 20,000 above-baseline units by 2030 is expected to yield 50,000 by 2050.)

Ironically, the DEIR’s own projections of housing production belie the housing element’s assertions. Although the DEIR includes no year-2030 projections, it does forecast that the regulatory status quo would yield only 56,000 housing units by 2035 (4-7). Assuming a flat time trend, that’s equivalent to $(8/13) * 56,000 = 34,461$ units by 2030, which implies that the housing element should lay the groundwork for rezoning and constraint removal sufficient to yield at least $82,069 - 34,461 = 47,608$ above-baseline units by 2030. **In other words, on the assumptions stated in the DEIR, the rezoning plan should be roughly 2.5 times as capacious as the DEIR’s “preferred” alternative.**

² [San Francisco Housing Affordability Strategies](#) (S.F. Planning Dept., March 2020); [Mayor Lee Announces New Executive Directive to Create More Homes in San Francisco](#) (Office of the Mayor, Sept. 27, 2017).

Not one alternative in the DEIR meets this standard. The principal alternatives, like the preferred alternative, would accommodate only 50,000 above-baseline units by 2050, or roughly 20,000 by 2030. The most ambitious alternative (Plan Bay Area) is only about 1.75 times as capacious (6-18).

Fortunately, the city does have “available resources” (Gov’t Code 65583(b)) to accommodate many more than 5000 units/year. For example, the city could concurrently adopt the Preferred Alternative, the Dispersed Growth Alternative, and the East Side Alternative, rather than treating them as mutually exclusive. This would provide the same or greater moving-to-opportunity benefits as the Preferred Alternative *and* generate more BMR units through the city’s inclusionary programs.³

It is imperative that the final EIR analyze alternatives that stack together the various rezoning scenarios. Without this, there is a real risk that the housing element update will go off the rails, as follows:

- **Train Wreck #1.** In this scenario, HCD would reject the pipeline/status-quo capacity analysis of the current housing element draft. HCD requires the city to commit to a much more ambitious rezoning plan. The city finds itself unable to complete the requisite environmental review for a compliant plan prior to the deadline for housing element adoption. The city thus falls out of compliance, resulting in loss of affordable housing funds and exposure to the [builder’s remedy](#).
- **Train Wreck #2.** In this scenario, HCD would provisionally accept the city’s pipeline/status-quo capacity analysis, but the department requires the housing element to include a program for mid-cycle rezoning in case the pipeline’s yield falls short of projections. (HCD has imposed similar requirements on other cities that made sunny forecasts of ADU production.) The pipeline yield then does fall short, but the city is

³ It would probably reduce displacement pressure in the upzoned East Side neighborhoods too. Cf. Kate Pennington, “Does Building New Housing Cause Displacement?: The Supply and Demand Effects of Construction in San Francisco” (UC Berkeley, June 15, 2021). Available at SSRN: <https://ssrn.com/abstract=3867764> or <http://dx.doi.org/10.2139/ssrn.3867764> (finding that redevelopment of fire-damaged buildings reduces rents nearby); Brian Asquith et al., “Supply Shock Versus Demand Shock: The Local Effects of New Housing in Low-Income Areas” (Upjohn Institute & Philadelphia Fed., Jan. 20, 2020) Available at SSRN: <https://ssrn.com/abstract=3507532> or <http://dx.doi.org/10.2139/ssrn.3507532> (finding that new market-rate development in low-income neighborhoods lowers rents nearby). See also Office of the Comptroller, “Potential Effects of Limiting Market-Rate Housing in the Mission” (San Francisco, Sept. 15, 2015, pp. 21-22) (“[W]e conclude that an 18-month moratorium on market-rate housing development in the Mission would not lead to reduced direct displacement of existing residents.”). One recent study does find that new market-rate construction in the Bay Area is correlated with increased outmigration, as well as immigration, of low- and middle-income households. See Karen Chapple et al. “Housing Market Interventions and Residential Mobility in the San Francisco Bay Area” (Federal Reserve Bank of San Francisco, March 2022, <https://fedinprint.org/item/fedfcw/93849/original>). But, in contrast to Pennington (2021) and Asquith et al. (2020), Chapple et al. (2022) has no strategy for identifying plausibly exogenous variation in the distribution of new housing across neighborhoods. The Chapple et al. findings are equally consistent with (1) developers preferring to build, or cities preferentially allowing developers to build, in places where neighborhood “churn” is trending upward for reasons independent of the new development, or (2) new development causing a change in neighborhood character that makes existing low- and middle-income residents want to leave or be pressured to leave, and new residents across the income spectrum want to move in.

4
Cont'd

unable to pull off a timely mid-cycle rezoning because the housing element EIR didn't lay the groundwork for it. HCD responds by decertifying the housing element, cutting off affordable housing funds and exposing the city to the builder's remedy.

3. The EIR should acknowledge the legal effect of a housing element.

The DEIR describes the housing element as a “long-term plan with no direct impacts” (4-6), one which “would not implement specific changes to existing land use controls (e.g., zoning)” (S-2). The DEIR relies on the asserted lack of “direct impacts” to justify the choice of a future-conditions baseline. I support the city's choice of a future-conditions baseline, but I would be cautious about grounding this decision on the asserted lack of direct or near-term impacts.

5

Although the housing element is not a zoning ordinance, HCD's [Sites Inventory Form](#) directs cities to designate how much density will be allowed *after rezoning* on each inventory site (see Table B, columns M - P). Meanwhile, the Housing Accountability Act generally prohibits cities from denying or “rendering infeasible” an affordable housing project, as defined, if the project “is proposed on a site that is identified as suitable ... for very low, low-, or moderate-income households in the jurisdiction's housing element, and [is] consistent with the density specified in the housing element, even though it is inconsistent with both the jurisdiction's zoning ordinance and general plan land use designation.” (Gov't Code 65589.5(d)(5)(A) (emphasis added).)

The upshot is that while San Francisco would still have discretion after adopting its housing element to enact a different rezoning plan (with conforming housing-element amendments), the city's *failure* to complete a legally adequate rezoning would not leave the zoning status quo in place. Rather, the city would be legally compelling to waive zoning and other land-use restrictions that prevent the development of inventory sites at “post-rezoning” densities contemplated by the housing element.

I don't think this reality prevents the city from grounding environmental review on a future-conditions baseline, but the EIR should forthrightly acknowledge the legal effect of the housing element, lest opponents attack it for not fully disclosing the consequences of the housing element's adoption.

4. The analysis of the No Action Alternative should discuss environmental impacts of noncompliance with the Housing Element Law.

6

The DEIR's discussion of the No Action Alternative presumes that it would leave the regulatory status quo in place. This is false. If the city does not adopt a substantially compliant housing element, it will forfeit authority to deny or “render infeasible” 20% low-income and 100% moderate-income projects on the basis of the city's zoning code and general plan land-use designations. (Gov't Code 65589.5(d)(5); Elmendorf, [“A Primer on California's ‘Builder's Remedy’ for Housing-Element Noncompliance”](#) (UCLA Lewis Center for Regional Policy Studies, April 2022).) There is also the possibility of a court order suspending the city's authority

to issue certain classes of building permits (Gov't Code 65755(a)), and, eventually, a court-led rewriting of the city's housing element (Gov't Code 65585(l)).

6
Cont'd

Obviously, it is very hard to predict how these consequences of noncompliance would affect the amount, type and distribution of housing development in San Francisco. The EIR therefore needn't address this topic in great detail. But if the EIR is to serve its function as an informational document, it should provide the responsible decision makers with at least a rudimentary sketch of the potential environmental effects of noncompliance.

5. The final EIR should discuss statewide and regional environmental benefits of higher-growth alternatives.

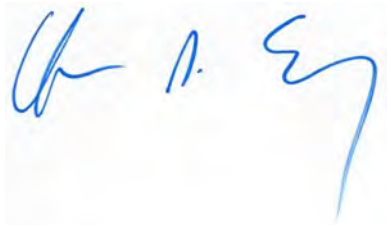
The DEIR asserts that the No Project Alternative is the “environmentally superior alternative” “[b]ecause it would result in the construction and operation of approximately 50,000 fewer housing units” than the other alternatives (S-5). This statement about the environmental effects of curtailing development in San Francisco may be formally true within the funhouse-mirror world that CEQA has created, but it is sheer nonsense as a proposition about the real world.

Increasing the size of San Francisco's housing stock is an unequivocal environmental (and economic) win from global, national, statewide, and regional perspectives. The more people whose preference to live in San Francisco can be accommodated, the fewer people will end up living in places where they produce more CO₂, displace wildlife, fill wetlands, bulldoze scenic vistas, disrupt the management of wildfire, and congest highways. CEQA may be blind to the environmental impacts of people whom San Francisco would fence out by restricting housing development, but CEQA's elision does not launch them off Planet Earth. If there's a feasible alternative that would allow them to live in San Francisco—an already urbanized area in a mild climate with excellent public transit—that alternative is almost surely the actual environmentally superior alternative.

It would be a welcome change for the final EIR to honor CEQA's purpose of “inform[ing] the government and public about a proposed activity's potential environmental impacts” (*California Bldg. Indus. Assn. v. Bay Area Air Quality Mgmt. Dist.* (2015) 62 Cal. 4th 369, 382) by addressing the **substantial environmental benefits**, not just the local downsides, of higher-growth alternatives.

Thank you for considering these comments.

Regards,



Christopher S. Elmendorf
Martin Luther King, Jr. Professor of Law
UC Davis School of Law
cselmendorf@ucdavis.edu

Resident of San Francisco since 2005.

Cc: Rich Hillis, Planning Director, City and County of San Francisco
Lisa Gluckstein, Housing & Land Use Advisor, Office of Mayor London Breed, City and County of San Francisco
Rachael Tanner, President, San Francisco Planning Commission
Kathrin Moore, Vice-President, San Francisco Planning Commission
Sue Diamond, Commissioner, San Francisco Planning Commission
Frank S. Fung, Commissioner, San Francisco Planning Commission
Joel Koppel, Commissioner, San Francisco Planning Commission
Theresa Imperial, Commissioner, San Francisco Planning Commission
Gabriella Ruiz, Commissioner, San Francisco Planning Commission
Sohab Mehmood, Housing Policy Specialist, California Department of Housing and Community Development
Megan Kirkeby, Deputy Director, Housing Policy Development, California Department of Housing and Community Development
Melinda Coy, Land Use and Planning Manager, California Department of Housing and Community Development
Paul McDougal, Housing Policy Manager, California Department of Housing and Community Development
Shannan West, Housing Accountability Unit Chief, California Department of Housing and Community Development

From: Bobak Esfandiari <info@email.actionnetwork.org>
Sent: Wednesday, June 8, 2022 11:54 AM
To: jonas.ionin@sfgov.org
Subject: Item 2019-016230ENV: plan for 10,000 homes per year by 2031

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

Planning Commission Secretary Jonas Ionin,

SF Planning's current approach to the Housing Element is laughably inadequate. You all need to seriously revise and rethink what you're doing before you cost San Francisco millions of dollars in state grants because you're unwilling and unserious about meeting our housing requirements as required by state law.

Fix this. Now. Make the changes that Chris Elmendorf has recommended below.

- Bobak

This Environmental Impact Report is an impact report for outdated housing targets. The report studies alternatives based on Mayor Lee's 2017 goal of building five thousand units per year by 2050, but former Mayor Lee's goal predates our RHNA and even predates the bill that outlined the parameters for calculating RHNA, that bill being Senator Wiener's SB 828. It is difficult to overstate how different these goals are: our RHNA requires ten thousand units per year by 2030, not five thousand units per year by 2050.

While expedient, it is wrong to not study a lawful alternative. Our city is walking blind into the actual environmental effects of accommodating our housing targets, and our city risks blowing all of our affordable housing funding.

Please add an alternative that studies rezoning for over seventy thousand additional units, as our RHNA requires. It is negligent not to.

I urge you to address the comments made by UC Davis Professor Chris Elmendorf in his analysis of the draft EIR:
https://url.avanan.click/v2/https://drive.google.com/file/d/10pIS1Sd6T7FdKBkgd5DD1MbOsEnJgbE1/view_.YXAzOnNmZHQyOmE6bzowNDI1NWUxNmMzNGJjOWVhYTVkMjEyNGMwYWYzMWUyZDo2OmExMmU6MWRIMmM0MjBkZjY4YzExMzlmYWVhYzI3YzE5OTdkOTIxYjRjNTEwNWE2MTNhY2I4OGJINDY4NGJjZDk5MmRjMzp0OIQ

Bobak Esfandiari
besfandiari@gmail.com
825 La Playa St
San Francisco, California 94121

From: Dan Federman <info@email.actionnetwork.org>
Sent: Wednesday, June 8, 2022 9:55 AM
To: jonas.ionin@sfgov.org
Subject: Hearing item 11: take our housing goals seriously in the Draft EIR

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

Planning Commission Secretary Jonas Ionin,

This Environmental Impact Report does not fully accommodate San Francisco's RHNA requirements. The DEIR seeks to satisfy Mayor Ed Lee's 2017 goal of producing 5,000 homes per year through 2050. But San Francisco's 2023-2030 RHNA is 82,069 units, which is roughly 10,000 homes per year. The DEIR's sites inventory report attempts to make up for this gap by rezoning for 20,000 units "above baseline," but this figure makes the faulty assumption that all units in the pipeline will actually become housing. To the contrary, Professor David Broockman's comment letter indicates that, based on the historical rate at which pipeline units turn into actual housing, San Francisco would need to rezone for 70,000 units above-baseline in order for the necessary inventory to actually come into existence.

By not fully accommodating San Francisco's RHNA, the DEIR sets San Francisco up for an enormous headache. Undershooting on the EIR would put an upper limit on the number of units produced by the city's housing element. This bind, in turn, would give the California HCD ground to reject the city's pipeline/status-quo capacity analysis. In the best case scenario, SF Planning would need to redo the requisite environmental review for a compliant plan prior to the deadline on a very limited time frame. This would mean long nights and early mornings struggling to meet a difficult deadline, and it would be unlikely to put SF Planning staff in a position to do their best work. In the worst case scenario, the city would be unable to meet the deadline altogether, thus falling out of compliance, losing affordable housing funds, and being exposed to the builder's remedy.

This course of events is still avertable. If the Planning Department writes an EIR for the proper number of units, San Francisco would be put in a much stronger position to pass a compliant housing element and avoid the consequences of being found out of compliance.

I urge you to heed the DEIR comments written by Professor Chris Elmendorf:

https://url.avanan.click/v2/_https://drive.google.com/file/d/10pIS1Sd6T7FdKBkgd5DD1MbOsEnJgbE1/view_.YXAzOnNmZHQyOmE6bzo5NGI2Yjk5YTg0NGMwZTJIMGQ3NDgxODImNmNiNzVhZTo2Ojc5NDg6OGM0M2EyZTdKNWU1M2RlMjYzM2VIMTc5Mjc0MDNIYzVmMTcyMGM1N2ZlZjUwZTZmMjY3YWU3YjA0OWZhMmVkNzpoOIQ

Dan Federman
dfed@me.com
1353 Page St
San Francisco, California 94117

From: Will Frankel <info@email.actionnetwork.org>

Sent: Wednesday, June 8, 2022 1:07 PM

To: jonas.ionin@sfgov.org

Subject: Hearing item 11: take our housing goals seriously in the Draft EIR

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

Planning Commission Secretary Jonas Ionin,

This Environmental Impact Report does not fully accommodate San Francisco's RHNA requirements. The DEIR seeks to satisfy Mayor Ed Lee's 2017 goal of producing 5,000 homes per year through 2050. But San Francisco's 2023-2030 RHNA is 82,069 units, which is roughly 10,000 homes per year. The DEIR's sites inventory report attempts to make up for this gap by rezoning for 20,000 units "above baseline," but this figure makes the faulty assumption that all units in the pipeline will actually become housing. To the contrary, Professor David Broockman's comment letter indicates that, based on the historical rate at which pipeline units turn into actual housing, San Francisco would need to rezone for 70,000 units above-baseline in order for the necessary inventory to actually come into existence.

By not fully accommodating San Francisco's RHNA, the DEIR sets San Francisco up for an enormous headache. Undershooting on the EIR would put an upper limit on the number of units produced by the city's housing element. This bind, in turn, would give the California Department of Housing and Community Development grounds to reject the city's pipeline/status-quo capacity analysis. In the best case scenario, SF Planning would need to redo the requisite environmental review for a compliant plan prior to the deadline on a very limited time frame. This would mean long nights and early mornings for city staffers struggling to meet a difficult deadline, and it would be unlikely to put SF Planning staff in a position to do their best work. In the worst case scenario, the city would be unable to meet the deadline altogether, thus falling out of compliance—losing eligibility for affordable housing funds, and possibly even losing land use authority.

This course of events is still avertable. If the Planning Department writes an EIR for the proper number of units, San Francisco would be put in a much stronger position to pass a compliant housing element and avoid the consequences of being found out of compliance.

I urge you to heed the DEIR comments written by Professor Chris Elmendorf:

<https://url.avanan.click/v2/> https://drive.google.com/file/d/10pIS1Sd6T7FdKBkgd5DD1MbOsEnJgbE1/view_.YXAzOnNmZHQyOmE6bzoyMTZiYmU4NzU1ZDIwMDcyZDU4MjhmMTgwMjA5ZTQwMjo2OmQ3NjY6ZTRkNTY5NTA4ZjFIY2UzZDEzZTYzN2JjM2U3YzVhNTFiZDE2MDFjNWE5YzM0NTQyMzlyMDQzZWUxY2I1OTJhMzp0OIQ

Will Frankel

wpfrankel@gmail.com

1228 Taylor St

San Francisco, California 94108

From: Robert Fruchtman <info@email.actionnetwork.org>
Sent: Wednesday, June 8, 2022 11:57 AM
To: jonas.ionin@sfgov.org
Subject: Item 11 this week: infill housing is GOOD for the environment

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

Planning Commission Secretary Jonas Ionin,

The Draft Environmental Impact Report (topic 2019-016230ENV) does not adequately address the transportation impacts of building more housing, especially on Vehicle Miles Traveled (VMT). Transportation is an important topic because "San Francisco has many more jobs than homes; as a result, workers must commute into San Francisco each day to reach their jobs" (4.1-68). The DEIR further states that "on average, people living or working in San Francisco have lower levels of VMT per capita than people living or working elsewhere in the nine-county San Francisco Bay Area region" (4.4-12). The message is clear that SF commuters impact the environment less than other residents and workers in the Bay Area region. This means that any environmental analysis should also consider the impact of a project and alternatives on the nine-county Bay Area as a whole.

However, the DEIR fails to reflect regional VMT in its analysis of which alternative is environmentally superior. The DEIR claims that the No Project Alternative is environmentally superior because it would construct fewer housing units (S-5); this claim is at odds with the impact of GHG emissions from the No Project Alternative. The DEIR determines that "although regional total daily VMT would increase because of the additional housing, the percentage increase would be less than what would be anticipated if the additional housing were located in an area with per capita VMT that is higher than the regional average." In other words, the No Project Alternative would lead to higher regional VMT and therefore greenhouse gas emissions because it would not decrease the number of workers who commute into San Francisco from areas with higher VMT per capita.

UC Davis Professor Chris Elmendorf has written a letter to the city detailing these concerns in more detail, and I support his comments:

<https://url.avanan.click/v2/> https://drive.google.com/file/d/10pIS1Sd6T7FdKBkgd5DD1MbOsEnJgbE1/view_.YXAzOnNmZHQyOmE6bzowZGRhM2YyN2JjYmVIMjhINzZIMDhjZGNIM2ZhOTA0Mjo2OmYxZWE6MzRjMTlkZWZiODE1YTRiZjQxOGUyMzZhNjQ1Y2EwMjQ2YTNjNTAyZTc3Y2ZkZTNkMmM0YjUzYzQ3MDJiZDg0NDp0OIQ

The EIR should therefore not refer to the No Project Alternative as the environmentally superior alternative, as doing so fails to recognize the GHG emissions which would result from it. Instead, the DEIR should plan to accommodate over 10,000 new housing units per year to address the climate crisis.

Robert Fruchtman
rfruchtose@gmail.com
616 Page St
San Francisco , California 94117

From: [Miriam Gauss](#)
To: [CPC.HousingElementUpdateEIR](#)
Subject: Height limits and zoning for the Richmond District
Date: Sunday, June 19, 2022 11:54:06 PM

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

Dear Ms. White:

As a resident of the Inner Richmond, I was amazed to see your proposed planner resolving the problem of additional housing on the west side of the city.

Like Presidio Heights, Pacific Heights, Sea Cliff, Noe Valley, and the Marina, excluded from the plan, my neighbors in Jordan Park, Laurel Heights, and Anza Vista have chosen to live in specific neighborhoods with character and charm. Each has its specific characteristics, often as old as the neighborhood itself. Homes in iconic Jordan Park, where I live, were specifically designed with free-standing homes with front and back gardens and traditionally were attractive to San Franciscans looking for peace and beauty in a low-key neighborhood. That is still true today.

The same is true for pockets of blocks throughout the Richmond.

Just like Presidio Heights, Sea Cliff, etc., these neighborhoods were not designed for the traffic and activity that greater density and structures of 85' would bring. Yes, within the Richmond there are certainly many specific areas that would allow for increasing height restrictions from the current 40'. California St. and Geary Blvd. wouldn't be impacted in the same way as Palm, Jordan, Commonwealth, and Parker. Such major arteries already have taller structures. The same could be said for streets that already are filled with predominantly several-story apartment buildings (as can be said about Pacific Heights just as well as the Richmond end of Fulton Street).

The charm of our neighborhoods is a large part of the attraction of San Francisco to newcomers. Unfortunately, transplants and visitors are no longer charmed by downtown/Union Square. Golden Gate Park will be more difficult to access. The quality of our public schools is in question. There must be a more creative way to deal with the need for housing than by destroying the one reason many families stay in the city!

Please give the concerns of current homeowners more thought before finalizing your solution to the need for more housing in the western side of the city and doing so in what many consider a poorly focused choice of neighborhoods.

Sincerely,
Miriam Gauss

From: [White, Elizabeth \(CPC\)](#)
To: [CPC.HousingElementUpdateEIR](#)
Subject: FW: Housing Element DEIR
Date: Tuesday, July 12, 2022 6:58:49 AM

From: Linda Glick <lindaglick@gmail.com>

Sent: Monday, July 11, 2022 9:58 PM

To: Stefani, Catherine (BOS) <catherine.stefani@sfgov.org>

Cc: Leon-Farrera, Malena (CPC) <malena.leon-farrera@sfgov.org>; Caltagirone, Shelley (CPC) <shelley.caltagirone@sfgov.org>; White, Elizabeth (CPC) <elizabeth.white@sfgov.org>; Donovan, Dominica (BOS) <dominica.donovan@sfgov.org>; Hillis, Rich (CPC) <rich.hillis@sfgov.org>

Subject: Housing Element DEIR

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

Dear Supervisor Stefani,

I ask your help in leading the way to make the process of review of the Housing Element DEIR much more inclusive. Having such an important document published on a website is not inclusive but left to chance that all interested parties will see it. We need community outreach and input on this report.

1. There has been no open and transparent process and no public hearings whatsoever. No notifications have ever been issued on this subject to the public at large.
2. Burying such a critical issue within the Planning Department's website is not an open and transparent method of notifying the public, it's quite the opposite-it's opaque and secretive.
3. No public hearings on what is clearly a once-in-a-generation change to the heights, size, bulk, density as well as the character of neighborhoods have taken place. This needs to be rectified.
4. Historical significance neighborhoods are being demolished under this plan. This needs to be analyzed in great detail.
5. The infrastructure to support this plan needs to be thoroughly reviewed and a plan to support projected housing development and have a realistic timeline.

Thank you Linda Glick 585 Laurel St.

Sent from [Mail](#) for Windows

From: [Alexandra Day Golden](#)
To: [CPC.HousingElementUpdateEIR](#); [Hillis, Rich \(CPC\)](#); [Tanner, Rachael \(CPC\)](#); [Moore, Kathrin \(CPC\)](#); [Diamond, Susan \(CPC\)](#); [Fung, Frank \(CPC\)](#); [Koppel, Joel \(CPC\)](#); [Imperial, Theresa \(CPC\)](#); [Ruiz, Gabriella \(CPC\)](#); [Donovan, Dominica \(BOS\)](#); [Stefani, Catherine \(BOS\)](#)
Subject: Housing Element RIR Vol. I
Date: Tuesday, July 12, 2022 11:20:37 AM

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

Dear Director of Planning Hillis and Planning Commission Members,

I am a homeowner on Commonwealth Avenue in Jordan Park. I've recently reviewed the Draft Environmental Impact Report ("EIR") Volume I for the San Francisco Housing Element 2022 Update" of the General Plan. I was surprised to see the height limitations for Jordan Park changed from the current 40 feet to a proposed 85 feet. While I'm in favor of creating new housing, I and my neighbors are very worried about this height increase for several reasons:

- It violates your stated objective of "fairness" in distributing incremental units throughout the city. Based upon Fig. 2-7, it appears that the area delineated by Clement, Euclid and Pine Streets to the north; Park Presidio to the west; Anza to the South; and Fillmore to the east (the Delineated Area") is being targeted to assume a disproportionate percentage of the 50,000 dwelling units ("D.U.s") that the city is seeking to add by 2050. However, while several other neighborhoods including the Sunset, Noe Valley, Pacific Heights, Presidio Heights, Sea Cliff and the Marina would see more density, they would not be subjected to similar height increases under the proposed plan.
- It is incompatible with your own definition of residential historical resource and would disqualify Jordan Park which has been a residential park since it's establishment in 1906: <https://sfplanning.org/residence-parks-historic-context-statement>
- From more technical viewpoint, as it currently exists, the West Side does not have the infrastructure (e.g. roads, parking, facilities, wastewater capacity, etc.) to bear the burden of the proposed development. For example, while the city plans to add 66 new recreational facilities by 2050, and our neighborhoods are currently well served in this regard, only six of the 66 planned new facilities are to be located in the West Side of the City. Thus, the West Side will be underserved in the future should this plan be realized.

Thank you for your consideration,
Alexandra Golden

--

Alexandra Day Golden
(908)-616-0292

From: [Jonathan Golden](#)
To: [CPC.HousingElementUpdateEIR](#); [Hillis, Rich \(CPC\)](#); [Tanner, Rachael \(CPC\)](#); [Moore, Kathrin \(CPC\)](#); [Diamond, Susan \(CPC\)](#); [Fung, Frank \(CPC\)](#); [Koppel, Joel \(CPC\)](#); [Imperial, Theresa \(CPC\)](#); [Ruiz, Gabriella \(CPC\)](#); [Donovan, Dominica \(BOS\)](#); [Stefani, Catherine \(BOS\)](#)
Subject: Letter from homeowner in Jordan Park on Housing Element EIR Vol 1
Date: Tuesday, July 12, 2022 10:59:35 AM

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

Hi,

I live at 91 Commonwealth Ave in Jordan Park with my family of 5 including 3 children. We purchased this home and live in the neighborhood because it was designed as a neighborhood. In fact it's a 'prescribed neighborhood' or 'residential park' akin to Sea Cliff or St. Francis Wood. These residential parks are defined by the SF Planning Department in this literature here: <https://sfplanning.org/residence-parks-historic-context-statement>

In reviewing the new height levels for the neighborhood, I can not help but be bewildered at how the city could be increasing these limits in Jordan Park. Jordan Park has been clearly defined as a residential park since its establishment in 1906.

I am for more density housing in the city but not at the cost of alternating specifically designed neighborhoods.

Specifically, I am writing to express my objection to the proposed revision to the building height limitation upward to 85 feet from the existing limit of 40 feet for Jordan Park as represented by Fig. 2-7 on page 2-25 of the Draft Environmental Impact Report ("EIR") Volume I for the San Francisco Housing Element 2022 Update" of the General Plan.

Would love your consideration in the matter.

Thanks,
Jonathan Golden

From: [Jason Greenfield](#)
To: [CPC.HousingElementUpdateEIR](#); [Hillis, Rich \(CPC\)](#); [Tanner, Rachael \(CPC\)](#); [Moore, Kathrin \(CPC\)](#); [Diamond, Susan \(CPC\)](#); [Fung, Frank \(CPC\)](#); [Koppel, Joel \(CPC\)](#); [Imperial, Theresa \(CPC\)](#); [Ruiz, Gabriella \(CPC\)](#); [Donovan, Dominica \(BOS\)](#); [Stefani, Catherine \(BOS\)](#)
Subject: Objection to Height Limit Increase in Jordan Park
Date: Tuesday, July 12, 2022 11:27:02 PM

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

Dear Director of Planning Hillis and Planning Commission Members:

My family and I are long-time residents of Jordan Park, where we are raising our three children. I am writing to express my strong objection to the proposed revision to the building height limitation upward to 85 feet from the existing limit of 40 feet for Jordan Park as represented by Fig. 2-7 on page 2-25 of the Draft Environmental Impact Report ("EIR") Volume I for the San Francisco Housing Element 2022 Update" of the General Plan.

While I completely understand the importance of densifying the city in order to provide much needed affordable and market rate housing, it seems that can be done along certain corridors vs destroying the character and fabric of the neighborhoods that make San Francisco so special.

It is hard to understand why the proposed plan so disproportionately impacts our neighborhood where we are not only absorbing a larger percentage of the dwelling unit goal, but are also being subject to height increases (40 feet to 85 feet) that other neighborhoods such as the Sunset, Noe Valley, Pacific Heights, Presidio Heights, Sea Cliff and the Marina are not being subject to. The current, plan, is simply failing to meet its own stated objective of fairness. Further, the city has always gone out of its way to ensure that the character of neighborhoods are maintained (by enacting extremely strict zoning rules regarding home renovations, etc) - so how can we understand the doubling of height in a neighborhood where not a single building is over 3 or 4 stories against a long tradition of maintaining the character of the architecture? Not only is this not fair, it will destroy our neighborhood - and unless you plan to destroy all the neighborhoods in San Francisco, then again, the proposed plan is not even close to "fair."

Again, there are corridors that lend themselves to densification - and, in particular, the zones that are targeted for even higher building heights along Geary make sense. However, allowing this height limitation increase to extend into the neighboring residential side streets like Jordan, Commonwealth, Palm and Parker, is incomprehensible. The Jordan Park Historic District is eligible for the California Register of Historical Resources under "Criterion C (architecture)." The proposed height increase would destroy the existing fabric, scale and character of the neighborhood that qualifies it for consideration as a "Historical Resource." Further, the proposed changes would irreparably divide our neighborhood, again, in contradiction to one of the stated objectives of the Housing Element that "proposed actions would not divide an established neighborhood."

Further, the West Side does not have the infrastructure to bear the burden of the proposed development. Responsible planning should ensure that the investment in infrastructure is made as a condition to adding densification. Doing so in reverse is doing a disservice to the entire resident population of the West Side.

There is no doubt that the Planning Commission will have to make tradeoffs to meet the city's housing goals. Increasing height limitations along California and Geary which border our small, neighborhood, make sense - as all neighborhoods in the city need to participate/do their part. Drastically increasing height limitations on the residential side streets which is in fact completely adverse to the stated goals of the EIR do not. No residential side street should have

5
Cont'd



an 85 foot height limit.

Please consider/develop other alternatives for how the planned growth and and development can be more evenly and equitably distributed throughout the city.

Thank you for your service to our beautiful city.

Sincerely,

Jason Greenfield

From: [Owen Hart](#)
To: [CPC.HousingElementUpdateEIR](#); [Hillis, Rich \(CPC\)](#); [Tanner, Rachael \(CPC\)](#); [Moore, Kathrin \(CPC\)](#); [Diamond, Susan \(CPC\)](#); [Fung, Frank \(CPC\)](#); [Koppel, Joel \(CPC\)](#); [Imperial, Theresa \(CPC\)](#); [Ruiz, Gabriella \(CPC\)](#)
Cc: [Donovan, Dominica \(BOS\)](#); [Stefani, Catherine \(BOS\)](#); [Owen L. Hart](#)
Subject: Proposed Height Limitation Increase Included in the EIR Vol. I for the Housing Element 2022 of the General Plan
Date: Sunday, July 10, 2022 5:20:09 PM

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

Dear Director of Planning Hillis and Planning Commission Members:

I am writing to express my strong objection to the proposed revision to the building height limitation upward to 85 feet from the existing limit of 40 feet for Jordan Park as represented by Fig. 2-7 on page 2-25 of the Draft Environmental Impact Report ("EIR") Volume I for the San Francisco Housing Element 2022 Update" of the General Plan.

- One of the guiding principles behind the housing element is that the development of new housing should be balanced fairly given that the west side has not absorbed much of the high density new residential development in the past. Based upon Fig. 2-7, it appears that the area delineated by Clement, Euclid and Pine Streets to the north; Park Presidio to the west; Anza to the South; and Fillmore to the east (the Delineated Area") is being targeted to assume a disproportionate percentage of the 50,000 dwelling units ("D.U.s") that the city is seeking to add by 2050. However, while several other neighborhoods including the Sunset, Noe Valley, Pacific Heights, Presidio Heights, Sea Cliff and the Marina would see more density, they would not be subjected to similar height increases under the proposed plan. Therefore, this plan clearly fails to meet its stated objective and standards of "fairness."
- Certain zones within the Delineated Area are targeted for even more dramatic building height limits of 200 feet (the former Lucky Penny site, for example) and Geary, as a commercial street and major east/west thoroughfare, is targeted for increased building height limits, which is understandable. However, allowing the height limitation increases to bleed into the neighboring many residential side streets, like Jordan, Commonwealth, Palm and Parker, is not. The Jordan Park Historic District is eligible for the California Register of Historical Resources under "Criterion C (architecture)." The proposed height increase would destroy the existing fabric, scale and character of the neighborhood that qualifies it for consideration as a "Historical Resource."
- From more technical viewpoint, as it currently exists, the West Side does not have the infrastructure (e.g. roads, parking, facilities, wastewater capacity, etc.) to bear the burden of the proposed development. For example, while the city plans to add 66 new recreational facilities by 2050, and our neighborhoods are currently well served in this regard, only six of the 66 planned new facilities are to be located in the West Side of the City. Thus, the West Side will be underserved in the future should this plan be realized.
- The proposed changes would irreparably divide neighborhoods in direct contradiction to one of the stated objectives of the Housing Element. In the section "Impacts and Mitigation Measures" (4.1-19 of the EIR Vol. I). Impact LU-1 dictates that "the proposed actions would not physically divide an established neighborhood." Specifically, this section states that "the proposed action would not directly or indirectly create any new physical barriers within the city that would divide established neighborhoods." Permitting buildings to be constructed to a height more than twice the height of the existing homes would *directly* and *indirectly* divide Jordan Park! This change would destroy the character of the neighborhood, eliminate vistas into and out of the neighborhood and materially reduce the natural sunlight in the neighborhood! All these impacts are contrary to the stated objectives of the EIR.

The Planning Commission must consider/develop other alternatives and scenarios for how the planned growth and development can be more evenly and equitably distributed throughout the city. Regardless of where they seek to increase the housing stock in the city, no residential side streets should have height limitations as great as 85 feet.

This will irreparably damage the urban fabric of our city and the character of our neighborhoods.

Sincerely,

Owen L. Hart
 120 Jordan Avenue
 San Francisco, CA 94118

From: [White, Elizabeth \(CPC\)](#)
To: [Dennis Hong](#); [CPC-Commissions Secretary](#)
Cc: [MelgarStaff \(BOS\)](#); [Hillis, Rich \(CPC\)](#); [Gibson, Lisa \(CPC\)](#); [Corey Smith](#); [Breed, Mayor London \(MYR\)](#); [CPC.HousingElementUpdateEIR](#)
Subject: RE: CPC.HousingElementUpdateEIR@sfgov. - 2019-016230ENV
Date: Thursday, June 9, 2022 9:13:53 AM

Hi Dennis,

I am confirming receipt and yes, your comments below will be part of the Housing Element 2022 Update RTC.

Thank you,

Liz

Elizabeth White, Senior Environmental Planner
Environmental Planning Division

San Francisco Planning Department
49 South Van Ness Avenue, Suite 1400, San Francisco, CA 94103
Direct: 628.652.7557 | www.sfplanning.org
[San Francisco Property Information Map](#)

From: Dennis Hong <dennisjames888@yahoo.com>

Sent: Thursday, June 09, 2022 8:58 AM

To: White, Elizabeth (CPC) <elizabeth.white@sfgov.org>; CPC-Commissions Secretary <commissions.secretary@sfgov.org>

Cc: MelgarStaff (BOS) <melgarstaff@sfgov.org>; Hillis, Rich (CPC) <rich.hillis@sfgov.org>; Gibson, Lisa (CPC) <lisa.gibson@sfgov.org>; Corey Smith <corey@sfhac.org>; Breed, Mayor London (MYR) <mayorlondonbreed@sfgov.org>; CPC.HousingElementUpdateEIR <CPC.HousingElementUpdateEIR@sfgov.org>

Subject: Re: CPC.HousingElementUpdateEIR@sfgov. - 2019-016230ENV

Dear, Miss. Elizabeth White and everyone. It's Dennis here and its June 9, 2022, 8:30am. I trust this email follow up gets to you all in time for today's - San Francisco Planning Commissions hearing at 1PM. This is my initial response here. 1. Another spot on Doc, 2. Received the hard copy last night. My quick overview here meets today's requirement for the "adacecy(?) of this DEIR and I'm satisfied with this DraftDEIR. dated 4/20/2022, both Vols I and II, and will continue reviewing it for my comments due on June 21th.

Another nice jog on this DEIR and its "Errata" date May 19, 2022. I'm sorry I will be unable to attend this important Meeting of June 9th, 2022, but I appreciate the opportunity to comment on it. Please confirm that this email has been received and will be part of the Final - RTC.

Sincerely,

Dennis

On Monday, June 6, 2022 at 07:28:27 AM PDT, White, Elizabeth (CPC) <elizabeth.white@sfgov.org> wrote:

Hi Dennis,

Thank you for your email. I'll mail the document to the address you provided below.

Regarding the location of the Draft EIR online, there is a banner on the San Francisco Planning Department's landing page with a link to the Housing Element Draft EIR:

<https://sfplanning.org/>

The Draft EIR is also featured on the landing page under the "What is Happening" section of the San Francisco Housing Element website:

<https://www.sfhousingelement.org/>

Thank you,

Liz

Elizabeth White, Senior Environmental Planner

Environmental Planning Division

San Francisco Planning Department

49 South Van Ness Avenue, Suite 1400, San Francisco, CA 94103

Direct: 628.652.7557 | www.sfplanning.org

[San Francisco Property Information Map](#)

From: Dennis Hong <dennisjames888@yahoo.com>

Sent: Saturday, June 04, 2022 3:35 PM

To: White, Elizabeth (CPC) <elizabeth.white@sfgov.org>

Cc: MelgarStaff (BOS) <melgarstaff@sfgov.org>; Hillis, Rich (CPC) <rich.hillis@sfgov.org>; Gibson, Lisa (CPC) <lisa.gibson@sfgov.org>; Corey Smith <corey@sfhac.org>; Breed, Mayor London (MYR) <mayorlondonbreed@sfgov.org>

Subject: [CPC.HousingElementUpdateEIR@sfgov](#). - 2019-016230ENV

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

Good morning Miss White and everyone, Dennis here. Its 6/4/2022 and I trust you and all are doing well over there. I'm following up on this DEIR and was requested to make my comments on this DEIR and its adequacy. As of this morning I have been unable to find this document online and or download it. Given the past few meetings both at the SF Board and the SF Planning Commission, is there a direct link to this document or perhaps better yet, can you send me a hard copy of this to me at 101 Marietta Drive, San Francisco, CA 94127? I think I have enough to be able to comment at the June 9th Public Meeting, but will make my final comments by June 21, 2022.

Please confirm that you have received this email and that it will be part of the Project's file and my soon to be Comments in the final RTC document.

My current internet has not been good for this process. Thanks for all that you all do with these Projects.

All the best,

Dennis

From: [Dennis Hong](#)
To: [White, Elizabeth \(CPC\)](#); [Hillis, Rich \(CPC\)](#); [CPC-Commissions Secretary](#); [Board of Supervisors. \(BOS\)](#)
Cc: [CPC.HousingElementUpdateEIR](#); [MelgarStaff \(BOS\)](#); [Gibson, Lisa \(CPC\)](#)
Subject: My comments 2 Housing element DEIR for 7/12/2022
Date: Monday, July 11, 2022 6:08:43 PM

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

Hello Miss Elizabeth White, SF Planning Housing Element 2022 team and everyone. I trust you are all doing well.

Thanks for the opportunity to forward my random; comments/notes, thoughts and my previous comments here.

I still support this DEIR, a lot of hard work went in to it, it is obvious with two full volumes of professional work. Because of the current Pandemic it has been difficult getting down to your offices and I have been mostly on the Remote end of it. Having said all that, Let's get started:

- 1 1. Would the on going Park Merced Housing project be consider as part of this upcoming DEIR-Westside? It looks like this area covers part of District 7 and 11.
- 2 2. Can a separate map showing all of the BoS district be added. not sure if this www works: <https://sfelections.sfgov.org/maps> This revised map might make it easier to follow.
- 3 3. How will all these on going State SB's and AB's impact this Housing Element 2022 Plan.
- 4 4. Can there be a chart and or a list of definitions showing what is Affordable, qualifications to meet for these units. i.e., what is BMR, Market rate etc.. This too is a never ending. But, just as an informational item.
- 5 5. This DEIR is bit more unique, only because as most DEIRs are directed to a specific bldg and not a city wide one size fits all City General/Master Plan. Sort of a project by project, so a NOP might not be used in this case. (??). I only knew of this DEIR because I have been tracking these DEIR etc. and was requested to respond to specific cases.
- 6 6. Considering one major change in another projects Scope; One Oak went from housing units to apartments was not sure if this DEIR provided for apartment units. I think apartments are more suitable for housing.

I hope my past emails worked. I was not sure how this revised 7/12/2022 due date works and who to send my comments to. So lets start with another one of my unbalanced comments to the Planner; Miss Elizabeth White, the planning team and the Planning Commission and the BoS and the Mayors office to make sure that I'm on the same page here. .

Pardon my hiccups here, but the steps and process changed from the normal and the DEIR was extensive and I know for sure I had missed the boat here.

DEIR comments:

I have been reviewing the massive Two volume DEIR Case No. 2021060358 - of April 20, 2022. I have reviewed it as a professional working doc or a live doc, only because of the never ending changes due to the following but not limited to; City, federal legislation, State Mandates and etc.

Again, in my opinion; this Doc should be like a working doc due to all the ongoing comments from Residents to the SFBoS, other changes, i.e. an example shown in item **A** (cut and paste) below. New legislation, etc..

A. 220792 [Petitions and Communications] Petitions and Communications received from June 23, 2022, through July 7, 2022, for reference by the President to Committee considering related matters, or to be ordered filed by the Clerk on July 12, 2022:

From Paulina Fayer, regarding a Charter Amendment to amend the Charter of the City and County of San Francisco to provide for accelerated review and approval of eligible 100% affordable housing projects. File No. 20631. Copy: Each Supervisor. (48) From Anastasia Yovanopoulos, regarding a proposed Ordinance amending the Planning Code to create the Group Housing Special Use District. File No. 211300. Copy: Each Supervisor. (49) From Anastasia Glikstern, regarding the Planning and Funding Committee meeting on July 5, 2022. Copy: Each Supervisor. (50)

OK, now that my email has caused enough damage. Can someone let me know that my email here has been received and will be part of the DEIR's RTC? When finished I would like a hard copy of this RTC or how these additional questions were addressed sent to me via the USPS.

Lastly, if anyone has any comments to my comments please feel free to chime back, good or bad.

All the best: **Dennis is at** dennisjames888@yahoo.com

From: [Linda Howell](#)
To: [CPC.HousingElementUpdateEIR](#); [Hillis, Rich \(CPC\)](#); [Tanner, Rachael \(CPC\)](#); [Moore, Kathrin \(CPC\)](#); [Diamond, Susan \(CPC\)](#); [Fung, Frank \(CPC\)](#); [Koppel, Joel \(CPC\)](#); [Imperial, Theresa \(CPC\)](#); [Ruiz, Gabriella \(CPC\)](#); [Donovan, Dominica \(BOS\)](#); [Stefani, Catherine \(BOS\)](#)
Cc: [Larry Howell](#); [Owen L. Hart](#)
Subject: Please STOP the building height proposal for Jordan Park
Date: Sunday, July 10, 2022 1:19:12 PM

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

Dear Director of Planning Hillis and Planning Commission Members:

PLEASE PLEASE consider how irrational it would be to revise the building height limitation in our neighborhood, Jordan Park. As residents of Jordan Park for 40 years we cannot possibly imagine our City destroying the nature of this historic neighborhood that we and our neighbors treasure and care for. Such a move would turn us into a high density area without the infrastructure. We are writing to STRONGLY express our objection to the proposed revision to the building height limitation upward to 85 feet from the existing limit of 40 feet for Jordan Park as represented by Fig. 2-7 on page 2-25 of the Draft Environmental Impact Report ("EIR") Volume I for the San Francisco Housing Element 2022 Update" of the General Plan.

• One of the guiding principles behind the housing element is that the development of new housing should be balanced fairly given that the west side has not absorbed much of the high density new residential development in the past. Based upon Fig. 2-7, it appears that the area delineated by Clement, Euclid and Pine Streets to the north; Park Presidio to the west; Anza to the South; and Fillmore to the east (the Delineated Area") is being targeted to assume a disproportionate percentage of the 50,000 dwelling units ("D.U.s") that the city is seeking to add by 2050. However, while several other neighborhoods including the Sunset, Noe Valley, Pacific Heights, Presidio Heights, Sea Cliff and the Marina would see more density, they would not be subjected to similar height increases under the proposed plan. Therefore, this plan clearly fails to meet its stated objective and standards of "fairness."

• Certain zones within the Delineated Area are targeted for even more dramatic building height limits of 200 feet (the former Lucky Penny site, for example) and Geary, as a commercial street and major east/west thoroughfare, is targeted for increased building height limits, which is understandable. However, allowing the height limitation increases to bleed into the neighboring many residential side streets, like Jordan, Commonwealth, Palm and Parker, is not. The Jordan Park Historic District is eligible for the California Register of Historical Resources under "Criterion C (architecture)." The proposed height increase would destroy the existing fabric, scale and character of the neighborhood that qualifies it for consideration as a "Historical Resource."

• From more technical viewpoint, as it currently exists, the West Side does not have the infrastructure (e.g. roads, parking, facilities, wastewater capacity, etc.) to bear the burden of the proposed development. For example, while the city plans to add 66 new recreational facilities by 2050, and our neighborhoods are currently well served in this regard, only six of the 66 planned new facilities are to be located in the West Side of the City. Thus, the West Side will be underserved in the future should this plan be realized.

4

■ • The proposed changes would irreparably divide neighborhoods in direct contradiction to one of the stated objectives of the Housing Element. In the section "Impacts and Mitigation Measures" (4.1-19 of the EIR Vol. I). Impact LU-1 dictates that "the proposed actions would not physically divide an established neighborhood." Specifically, this section states that "the proposed action would not directly or indirectly create any new physical barriers within the city that would divide established neighborhoods." Permitting buildings to be constructed to a height more than twice the height of the existing homes would directly and indirectly divide Jordan Park! This change would destroy the character of the neighborhood, eliminate vistas into and out of the neighborhood and materially reduce the natural sunlight in the neighborhood! All these impacts are contrary to the stated objectives of the EIR.

5

■ The Planning Commission must consider/develop other alternatives and scenarios for how the planned growth and development can be more evenly and equitably distributed throughout the city. Regardless of where they seek to increase the housing stock in the city, no residential side streets should have height limitations as great as 85 feet. This will irreparably damage the urban fabric of our city and the character of our neighborhoods.

Sincerely,

linda and larry howell
20 palm avenue
san francisco, ca 94118

415-990-0760(cell)

From: David Ivan <info@email.actionnetwork.org>
Sent: Thursday, June 9, 2022 9:35 AM
To: CPC-Commissions Secretary <commissions.secretary@sfgov.org>
Subject: Item 11 this week: infill housing is GOOD for the environment

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

Planning Commission Staff Commission Affairs,

I agree with all of the below statement, however it is very technical. I will say more plainly, its not clear how it is possible to think that building a denser city would be worse for the environment than encouraging sprawl across the bay area and the state. To think this requires a severe lack of critical thinking skills. I know the language is harsh, but it is the truth.

The Draft Environmental Impact Report (topic 2019-016230ENV) does not adequately address the transportation impacts of building more housing, especially on Vehicle Miles Traveled (VMT). Transportation is an important topic because "San Francisco has many more jobs than homes; as a result, workers must commute into San Francisco each day to reach their jobs" (4.1-68). The DEIR further states that "on average, people living or working in San Francisco have lower levels of VMT per capita than people living or working elsewhere in the nine-county San Francisco Bay Area region" (4.4-12). The message is clear that SF commuters impact the environment less than other residents and workers in the Bay Area region. This means that any environmental analysis should also consider the impact of a project and alternatives on the nine-county Bay Area as a whole.

However, the DEIR fails to reflect regional VMT in its analysis of which alternative is environmentally superior. The DEIR claims that the No Project Alternative is environmentally superior because it would construct fewer housing units (S-5); this claim is at odds with the impact of GHG emissions from the No Project Alternative. The DEIR determines that "although regional total daily VMT would increase because of the additional housing, the percentage increase would be less than what would be anticipated if the additional housing were located in an area with per capita VMT that is higher than the regional average." In other words, the No Project Alternative would lead to higher regional VMT and therefore greenhouse gas emissions because it would not decrease the number of workers who commute into San Francisco from areas with higher VMT per capita.

UC Davis Professor Chris Elmendorf has written a letter to the city detailing these concerns in more detail, and I support his comments:

https://url.avanan.click/v2/_https://drive.google.com/file/d/10plS1Sd6T7FdKBkgd5DD1MbOsEnJgbE1/view_.YXAzOnNmZHQyOmE6bzpkMzkxZjRhOGewMWJmOTMwNzU4NWQ1MTJjMGU5Mml3Zjo2OjgwYWQ6Mzc3Zjk0YTMzNDFIODVkMTZmYTFIM2MxZGRiZDNmZWVjYjY3ZDBiNWRkYmU4NjVIMDY4YzUyOWM1OTNINjJkOTp0OIQ

The EIR should therefore not refer to the No Project Alternative as the environmentally superior alternative, as doing so fails to recognize the GHG emissions which would result from it. Instead, the DEIR should plan to accommodate over 10,000 new housing units per year to address the climate crisis.

David Ivan
ivandavid14@gmail.com
 630 Alvarado Street, Apartment 202
 San Francisco, California 94114

From: [White, Elizabeth \(CPC\)](#)
To: [CPC.HousingElementUpdateEIR](#)
Subject: FW: Housing Element
Date: Monday, July 11, 2022 7:56:50 AM

From: Mary <maryjacobi@comcast.net>

Sent: Saturday, July 09, 2022 4:34 PM

To: White, Elizabeth (CPC) <elizabeth.white@sfgov.org>; shelley.caltagirone@fgov.org

Subject: Housing Element

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

To the supervisor, Legislative Aide and members of the Planning Department:
 I am the owner of the two units at 41 and 43 Lupine. We are very concerned about any action taken to develop the area, increase density, and change allowable heights in our neighborhood.

I believe the public has a right to weigh in on the entire Plan/Draft EIR within the context of an open, transparent, Public Outreach process that reaches all the neighborhoods. Anything less is a biased, opaque attempt to avoid any and all input and responsibility.

The July 12th cutoff for public comment needs to be withdrawn and rescheduled for a date AFTER the Planning Department has conducted a thorough, thoughtful and professional Public Outreach that includes all the neighborhoods impacted.

I support the content of the questions and comments as they are stated below and remain anxious about the effect of your proposals/actions on our lives.

Some initial questions/comments:

1. Why has 60% of the city been totally excluded from this Plan? Some of the areas excluded include the areas closest to major employment centers, areas of the highest transportation infrastructure, areas of the highest concentration of restaurants/shops/services/etc. Areas most attractive to the fastest growing demographic in San Francisco.
2. In the remaining approximately 40% of the city why has over 50% of that area been excluded from meaningful changes with only minor changes in densification and no changes in heights? Who decided to do this?
3. Why is the Fulton #5 Bus corridor excluded? This exclusion simply intensifies the impacts elsewhere. Who decided this?
4. Why is the draconian impact along California St/Geary Blvd/Judah St/Taraval/19th confined to a 1-1/2 block or less distance? Are the people in these new units unable or unwilling to walk more than 200ft? If the Plan used the City's previous standard of ¼ mile from ANY bus route the impacts on the neighborhoods would be moderate rather than horrific and a reasonable starting point for this entire process.
5. How is the Planning Dept. taking into account the historic nature of many of the areas being decimated? How will this destruction be mitigated?
6. Where is the 7.5 million gallons of fresh water required to service the new

residents coming from. (This number is calculated from statistics derived from the SF city website.) No EIR in the 21st Century (a period of global warming and climate change) that ignores the impact of fresh water can be considered credible. It's not even a starting point.

Please pay attention to these issues and the effect they have on our lives.

Sincerely,

Mary Jacobi

41 and 43 Lupine

415 517 2462

From: Corey Johnson <info@email.actionnetwork.org>
Sent: Wednesday, June 8, 2022 9:46 AM
To: jonas.ionin@sfgov.org
Subject: Item 2019-016230ENV: plan for 10,000 homes per year by 2031

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

Planning Commission Secretary Jonas Ionin,

San Francisco's climate and environment make it one of the most climate friendly places for urban development. In city government, we can't change things at a global level, but we can start making changes locally to help curb climate change. Let's start today so my children can live in a better, healthier San Francisco. It all starts with the Environmental Impact Report.

This Environmental Impact Report has outdated housing targets. The report studies alternatives based on Mayor Lee's 2017 goal of building five thousand units per year by 2050, but former Mayor Lee's goal predates our RHNA and even predates the bill that outlined the parameters for calculating RHNA, that bill being Senator Wiener's SB 828. It is difficult to overstate how different these goals are: our RHNA requires ten thousand units per year by 2030, not five thousand units per year by 2050.

While expedient, it is wrong to not study a lawful alternative. Our city is walking blind into the actual environmental effects of accommodating our housing targets, and our city risks blowing all of our affordable housing funding.

Please add an alternative that studies rezoning for over seventy thousand additional units, as our RHNA requires. It is negligent not to.

I urge you to address the comments made by UC Davis Professor Chris Elmendorf in his analysis of the draft EIR:
https://url.avanan.click/v2/https://drive.google.com/file/d/10pIS1Sd6T7FdKBkgd5DD1MbOsEnJgbE1/view_.YXAzOnNmZHQyOmE6bzo3MGRmOGRjYTc3MjdiY2I0YTM0ODhhOWE5MDMwZDQ2Zjo2OjdINmY6MDMwMTEyN2JhMDIhNWYzNDY0OTQwMmE3NDRIMDUxOTc5ZDRmNDg3YzFINGE5NjI2YjQ5YmIzY2MxNDhiNmYwYTp0OIQ

Corey Johnson
probablycorey@gmail.com
probablycorey@gmail.com
San Francisco, California 94115

From: David Kanter <info@email.actionnetwork.org>
Sent: Wednesday, June 8, 2022 12:01 PM
To: jonas.ionin@sfgov.org
Subject: Item 11 this week: infill housing is GOOD for the environment

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

Planning Commission Secretary Jonas Ionin,

The Draft Environmental Impact Report (topic 2019-016230ENV) does not adequately address the transportation impacts of building more housing, especially on Vehicle Miles Traveled (VMT). Transportation is an important topic because "San Francisco has many more jobs than homes; as a result, workers must commute into San Francisco each day to reach their jobs" (4.1-68). The DEIR further states that "on average, people living or working in San Francisco have lower levels of VMT per capita than people living or working elsewhere in the nine-county San Francisco Bay Area region" (4.4-12). The message is clear that SF commuters impact the environment less than other residents and workers in the Bay Area region. This means that any environmental analysis should also consider the impact of a project and alternatives on the nine-county Bay Area as a whole.

However, the DEIR fails to reflect regional VMT in its analysis of which alternative is environmentally superior. The DEIR claims that the No Project Alternative is environmentally superior because it would construct fewer housing units (S-5); this claim is at odds with the impact of GHG emissions from the No Project Alternative. The DEIR determines that "although regional total daily VMT would increase because of the additional housing, the percentage increase would be less than what would be anticipated if the additional housing were located in an area with per capita VMT that is higher than the regional average." In other words, the No Project Alternative would lead to higher regional VMT and therefore greenhouse gas emissions because it would not decrease the number of workers who commute into San Francisco from areas with higher VMT per capita.

UC Davis Professor Chris Elmendorf has written a letter to the city detailing these concerns in more detail, and I support his comments:

https://url.avanan.click/v2/_https://drive.google.com/file/d/10pIS1Sd6T7FdKBkgd5DD1MbOsEnJgbE1/view_.YXAzOnNmZHQyOmE6bzo1YTljMGRkODczOWY1Mzg1MWJIMjU2MTk0M2FiZW5NT02Ojc0NDQ6NmMwMjkzNjBIOTYxNzhiNTc1YmMxNjdjYjk3ODVhOGQ0NWQwMzg0ZjQwMWFiodUxNTNmNGZiNGMxMDkzNmQ4YzpoOIQ

The EIR should therefore not refer to the No Project Alternative as the environmentally superior alternative, as doing so fails to recognize the GHG emissions which would result from it. Instead, the DEIR should plan to accommodate over 10,000 new housing units per year to address the climate crisis.

David Kanter
dkoffer@gmail.com
 633 Grand View Avenue, Apt 4
 San Francisco, California 94114

From: Ira Kaplan <info@email.actionnetwork.org>
Sent: Wednesday, June 8, 2022 9:41 AM
To: jonas.ionin@sfgov.org
Subject: Hearing item 11: take our housing goals seriously in the Draft EIR

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

Planning Commission Secretary Jonas Ionin,

This Environmental Impact Report does not fully accommodate San Francisco's RHNA requirements. The DEIR seeks to satisfy Mayor Ed Lee's 2017 goal of producing 5,000 homes per year through 2050. But San Francisco's 2023-2030 RHNA is 82,069 units, which is roughly 10,000 homes per year. The DEIR's sites inventory report attempts to make up for this gap by rezoning for 20,000 units "above baseline," but this figure makes the faulty assumption that all units in the pipeline will actually become housing. To the contrary, Professor David Broockman's comment letter indicates that, based on the historical rate at which pipeline units turn into actual housing, San Francisco would need to rezone for 70,000 units above-baseline in order for the necessary inventory to actually come into existence.

By not fully accommodating San Francisco's RHNA, the DEIR sets San Francisco up for an enormous headache. Undershooting on the EIR would put an upper limit on the number of units produced by the city's housing element. This bind, in turn, would give the California HCD ground to reject the city's pipeline/status-quo capacity analysis. In the best case scenario, SF Planning would need to redo the requisite environmental review for a compliant plan prior to the deadline on a very limited time frame. This would mean long nights and early mornings struggling to meet a difficult deadline, and it would be unlikely to put SF Planning staff in a position to do their best work. In the worst case scenario, the city would be unable to meet the deadline altogether, thus falling out of compliance, losing affordable housing funds, and being exposed to the builder's remedy.

This course of events is still avertable. If the Planning Department writes an EIR for the proper number of units, San Francisco would be put in a much stronger position to pass a compliant housing element and avoid the consequences of being found out of compliance.

I urge you to heed the DEIR comments written by Professor Chris Elmendorf:

<https://url.avanan.click/v2/> <https://drive.google.com/file/d/10plS1Sd6T7FdKBkgd5DD1MbOsEnJqbE1/view>.YXAzOnNmZHQyOmE6bzozZWRjOGlyNTBjYjEyZmVhZjIjZWl0NzZhZDZjNzVjMDo2OjdHbmE6YmY2OTdkNWwzN2l0YWY2NmI1MTQzMTE3OTFjNTFkZWVhZDU2ZjdlZGM5NmRhYTA4MzNiYzNmZTgwYTZDE5Mzp0OIQ

Ira Kaplan
iradkaplan@gmail.com
 1406 Kearny Street
 San Francisco, California 94133

From: Roan Kattouw <info@email.actionnetwork.org>
Sent: Wednesday, June 8, 2022 9:50 AM
To: jonas.ionin@sfgov.org
Subject: Prevent sprawl in the 2022 housing element (file 2019-016230ENV)

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

Planning Commission Secretary Jonas Ionin,

This Environmental Impact Report fails to recognize the statewide and regional environmental benefits of higher-growth alternatives. On the contrary, the report considers the No Project Alternative environmentally superior as 50,000 less housing units would be planned for (S-5). This couldn't be further detached from reality:

According to a study by Apartment List on 2017 data, the Bay Area and its exurbs had the nation's highest share of super commuters traveling 90 min or more to work. Building less housing units in San Francisco forces people to live in such places where they produce more CO2, displace wildlife, fill wetlands, bulldoze scenic vistas, disrupt the management of wildfire, and congest highways. Building new housing in San Francisco on the other hand would allow those people to take advantage of our public transit systems and live in energetically efficient multi-family units.

Therefore, I ask you to in particular reconsider Impact GHG-1 for the No Project Alternative to reflect the higher greenhouse gas emissions this alternative would cause, and study rezoning for over eighty thousand additional units, as our RHNA requires, which would have significant positive environmental benefits.

I support Professor Chris Elmendorf's comments on the DEIR:

<https://url.avanan.click/v2/> https://drive.google.com/file/d/10plS1Sd6T7FdKBkgd5DD1MbOsEnJgbE1/view_.YXAzOnNmZHQyOmE6bzpmY2QwODk3YjYzZjZhZTUzMGE3YzY2NzQ2MGIwOGNmNjo2OmZkZjg6OWUwYjJkYzAwZDQzNzY4MzA5Y2E1YjBjODdhOGViMWYxYzAyYWY4YTA1ZDBjZGJhMGY5MThkNzgZjZWZiYmM0OTp0OIQ

Roan Kattouw
roan.kattouw@gmail.com
1906 1/2 Golden Gate Ave
San Francisco, California 94115

From: [Donovan, Dominica \(BOS\)](#)
To: [Nate Keller](#); [Stefani, Catherine \(BOS\)](#)
Cc: [CPC.HousingElementUpdateEIR](#)
Subject: Re: Proposed Height Limit changes in JP
Date: Friday, June 17, 2022 10:38:49 AM

Thanks so much for this, Nathaniel. I'm copying Planning Staff as well to ensure that they can include this correspondence for their consideration.

All the best,
Dominica

From: Nate Keller <keller.nate@gmail.com>
Sent: Thursday, June 16, 2022 4:21 PM
To: Donovan, Dominica (BOS) <dominica.donovan@sfgov.org>; Stefani, Catherine (BOS) <catherine.stefani@sfgov.org>
Subject: Fwd: Proposed Height Limit changes in JP

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

Hi Supervisor Stefani and Ms. Donovan,
I am writing as a resident of Jordan Park to voice my *support* for increasing height limits as laid out in the "Draft Environmental Impact Report Volume I for the San Francisco Housing Element 2022 Update" of the General Plan. The language in my neighborhood association's email below is typical NIMBY garbage that is the reason that so little critical housing is built in our city. Language such as "Urban Fabric", "Character of our Neighborhoods", and "other alternatives and scenarios for how the planned growth and development can be more evenly and equitably distributed throughout the city" are just code for filibustering so that nothing will change and so that existing homeowners can see their home equity increase while continuing to make the city unaffordable and non-diverse for newcomers.

Nathaniel Keller

----- Forwarded message -----

From: Owen L. Hart <olhart120@gmail.com>
Date: Thu, Jun 16, 2022 at 3:38 PM
Subject: Proposed Height Limit changes in JP
To: Nathaniel Keller <keller.nate@gmail.com>

Dear Members:

There is an urgent matter that I wanted to bring to your attention. I was recently made aware of some proposed Height Limit/zoning changes that are incorporated in the "Draft Environmental Impact Report Volume I for the San Francisco Housing Element 2022 Update" of the General Plan. Buried on page 2-25 (Fig. 2-7) within the 600+ page report (which can be accessed online at SFplanning.org) is a map outlining proposed changes to the building height limitations for San Francisco's various neighborhoods. Upon reviewing this graphic, I was shocked to see proposed changes that would increase the current building height restriction from 40 feet to 85 feet

for much of Jordan Park! It appears that the area delineated by Clement, Euclid and Pine Streets to the north; Park Presidio to the west; Anza to the South; and Fillmore to the east is being targeted to assume a disproportionate percentage of the 50,000 dwelling units (“D.U.s”) that the city is seeking to add by 2050. Certain other zones within or adjacent to our neighborhoods are targeted for even more dramatic building height limits of 200 feet (the former Lucky Penny site, for example). So, the character of Jordan Park, Laurel Heights, Anza Vista, Japantown and the Inner Richmond all could be dramatically and adversely impacted under this plan, as it could basically turn our neighborhoods into a West Side version of Mission Bay.

The theory behind the housing element is that the development of new housing should be balanced fairly given that the west side has not absorbed much of the high density new residential development in the past. Geary, as a commercial corridor and major east/west thoroughfare, is targeted for increased building height limits, which is understandable; but so are many residential side streets, like Jordan, Commonwealth, Palm and Parker, which is not. Moreover, several neighborhoods would see more density, but no height increases (on their side streets), under the proposed plan, including the Sunset, Noe Valley, Pacific Heights, Presidio Heights, Sea Cliff, Marina. Therefore, this plan clearly fails to meet its stated objectives and standard.

From a more technical viewpoint, we do not have the infrastructure (e.g. roads, parking, facilities and wastewater capacity) to bear this burden. For example, while the city plans to add 66 new recreational facilities by 2050, and our neighborhoods are currently well served in this regard, only six of the 66 planned new facilities are to be located in the West Side of the City. Thus, the West Side will be underserved in the future should this plan continue to gain acceptance.

My concern is that this proposal will receive little scrutiny, as it appears that few are aware of this plan (I certainly wasn't). I have shared my concerns with the Laurel Heights Improvement Association who indicated that they were previously not aware of this proposal either.

I also have shared my concerns with Supervisor Stefani's office and plan to alert the planning commission that we are against this proposal. We also will push to have the Planning Commission consider/develop other alternatives and scenarios for how the planned growth and development can be more evenly and equitably distributed throughout the city. Regardless of where they seek to increase the housing stock in the city, no residential side streets should have height limitations as great as 85 feet. This will irreparably damage the urban fabric of our city and the character of our neighborhoods.

The comment period for this report ends June 20th. We are going to ask for an extension as this element of the study has not been adequately disclosed to San Francisco's neighborhood associations and citizens. Regardless, I

encourage all of you to let Supervisor Stefani's office and our planning commission and commissioners know your views on this proposal. Time is of the essence here so please act quickly. The relevant email addresses are listed below (please note, the links do not copy into our eChapters listing, so you likely have to cut and paste them into your emails).

Best,

Owen

Elizabeth White: CPC.HousingElementUpdateEIR@sfgov.org

Rich Hillis, Director of Planning: rich.hillis@sfgov.org

Rachael Tanner, President: Rachael.Tanner@sfgov.org

Kathrin Moore, Vice-President: kathrin.moore@sfgov.org

Sue Diamond, Commissioner: sue.diamond@sfgov.org

Frank S. Fung, Commissioner: frank.fung@sfgov.org

Joel Koppel, Commissioner: joel.koppel@sfgov.org

Theresa Imperial, Commissioner: theresa.imperial@sfgov.org

Gabriella Ruiz, Commissioner: gabriella.ruiz@sfgov.org

Donovan, Dominica, Legislative Aide, Office of Supervisor Catherine Stefani: dominica.donovan@sfgov.org

This message was sent by eChapters.com on behalf of Jordan Park Improvement Assoc., based on an opt-in mailing list managed by Jordan Park Improvement Assoc.. If you believe you have received this mail in error, please contact olhart120@gmail.com and ask to have your address removed from this mailing list.

--

Nathaniel B. Keller

keller.nate@gmail.com

From: [Liz Kind](#)
To: [CPC.HousingElementUpdateEIR](#)
Subject: Fw: Building Heights
Date: Monday, July 11, 2022 9:27:30 PM

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

From: Liz Kind <lkind@pacbell.net>

To: eir@sfgov.org <eir@sfgov.org>; rich.hillis@sfgov.org <rich.hillis@sfgov.org>; rachael.tanner@sfgov.org <rachael.tanner@sfgov.org>; kathrin.moore@sfgov.org <kathrin.moore@sfgov.org>; sue.diamond@sfgov.org <sue.diamond@sfgov.org>; frank.fung@sfgov.org <frank.fung@sfgov.org>; joel.koppel@sfgov.org <joel.koppel@sfgov.org>; theresa.imperial@sfgov.org <theresa.imperial@sfgov.org>; gabriella.ruiz@sfgov.org <gabriella.ruiz@sfgov.org>; dominica.donovan@sfgov.org <dominica.donovan@sfgov.org>; catherine.stefani@sfgov.org <catherine.stefani@sfgov.org>

Sent: Monday, July 11, 2022 at 09:24:08 PM PDT

Subject: Building Heights

Dear Director of Planning Hillis and Planning Commission Members:

I am writing to express my objection to the proposed revision to the building height limitation upward to 85 feet from the existing limit of 40 feet for Jordan Park as represented by Fig. 2-7 on page 2-25 of the Draft Environmental Impact Report ("EIR") Volume I for the San Francisco Housing Element 2022 Update" of the General Plan.

I am a homeowner adjacent to a Geary property. The increased height allowance will directly affect my property, and many of my neighbors. If the Geary properties are built to 85 feet, the shadow cast will completely obstruct sunlight for most of every day for me and many of my neighbors. I am hopeful that a policy be designed to protect existing homeowners.

One of the guiding principles behind the housing element is that the development of new housing should be balanced fairly given that the west side has not absorbed much of the high density new residential development in the past. Based upon Fig. 2-7, it appears that the area delineated by Clement, Euclid and Pine Streets to the north; Park Presidio to the west; Anza to the South; and Fillmore to the east (the Delineated Area") is being targeted to assume a disproportionate percentage of the 50,000 dwelling units ("D.U.s") that the city is seeking to add by 2050. However, while several other neighborhoods including the Sunset, Noe Valley, Pacific Heights, Presidio Heights, Sea Cliff and the Marina would see more density, they would not be subjected to similar height increases under the proposed plan. Therefore, this plan clearly fails to meet its stated objective and standards of "fairness."

Certain zones within the Delineated Area are targeted for even more dramatic building height limits of 200 feet (the former Lucky Penny site, for example) and Geary, as a commercial street and major east/west thoroughfare, is targeted for increased building height limits, which is understandable. However, allowing the height limitation increases to bleed into the neighboring many residential side streets, like Jordan, Commonwealth, Palm and Parker, is not. The Jordan Park Historic District is eligible for the California Register of Historical Resources under "Criterion C (architecture)." The proposed height increase would destroy the existing fabric, scale and character of the neighborhood that qualifies it for consideration as a "Historical Resource."

From a more technical viewpoint, as it currently exists, the West Side does not have the infrastructure (e.g. roads, parking, facilities, wastewater capacity, etc.) to bear the burden of the proposed development. For example, while the city plans to add 66 new recreational facilities by 2050, and our neighborhoods are currently well served in this regard, only six of the 66 planned new facilities are to be located in the West Side of the City. Thus, the West side will be underserved in the future should this plan be realized.

4

The proposed changes would irreparably divide neighborhoods in direct contradiction to one of the stated objectives of the Housing Element. In the section "Impacts and Mitigation Measures" (4.1-19 of the EIR Vol. I). Impact LU-1 dictates that "the proposed actions would not physically divide an established neighborhood." Specifically, this section states that "the proposed action would not directly or indirectly create any new physical barriers within the city that would divide established neighborhoods." Permitting buildings to be constructed to a height more than twice the height of the existing homes would directly and indirectly divide Jordan Park! This change would destroy the character of the neighborhood, eliminate vistas into and out of the neighborhood and materially reduce the natural sunlight in the neighborhood! All these impacts are contrary to the stated objectives of the EIR. The Planning Commission must consider/develop other alternatives and scenarios for how the planned growth and development can be more evenly and equitably distributed throughout the city. Regardless of where they seek to increase the housing stock in the city, no residential side streets should have height limitations as great as 85 feet. This will irreparably damage the urban fabric of our city and the character of our neighborhoods.

5

Thank you for your consideration.

Sincerely,

Elizabeth A. Kind

From: Matthew Klenk <info@email.actionnetwork.org>
Sent: Wednesday, June 8, 2022 11:58 AM
To: jonas.ionin@sfgov.org
Subject: Item 2019-016230ENV: plan for 10,000 homes per year by 2031

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

Planning Commission Secretary Jonas Ionin,

1 This Environmental Impact Report is an impact report for outdated housing targets. The report studies alternatives based on Mayor Lee's 2017 goal of building five thousand units per year by 2050, but former Mayor Lee's goal predates our RHNA and even predates the bill that outlined the parameters for calculating RHNA, that bill being Senator Wiener's SB 828. It is difficult to overstate how different these goals are: our RHNA requires ten thousand units per year by 2030, not five thousand units per year by 2050.

While expedient, it is wrong to not study a lawful alternative. Our city is walking blind into the actual environmental effects of accommodating our housing targets, and our city risks blowing all of our affordable housing funding.

Please add an alternative that studies rezoning for over seventy thousand additional units, as our RHNA requires. It is negligent not to.

2 I urge you to address the comments made by UC Davis Professor Chris Elmendorf in his analysis of the draft EIR:
https://url.avanan.click/v2/_https://drive.google.com/file/d/10pIS1Sd6T7FdKBkgd5DD1MbOsEnJgbE1/view_.YXAzOnNmZHQyOmE6bzowYTc0MzEwZDI4NWE0ZjZjNGM5YmYxMmQ4MGVmZTk0ZDo2OjJiZjE6MjllYW11MDAyNWE1OWVhNDEzZDc5NDkyNTdhMjgyMTU1YmYzOGNjZjVmYjllYTQyZmJOTlhMjAyMjZiMjllYz0OIQ

Matthew Klenk
klenk.matt@gmail.com
393 Melrose Ave
San Francisco, California 94127

From: [Laura Kline](#)
To: [CPC.HousingElementUpdateEIR](#)
Subject: Draft Environmental Impact Report Vol 1
Date: Friday, June 17, 2022 12:00:18 PM

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

1 ■ It has come up at our neighborhood Association that there are proposals included in this draft
2 ■ for an increase in height limits on residential side streets up to 85 feet. I am writing to voice
3 ■ my concern about the impact this would have on the neighborhoods of San Francisco, and in
■ particular, the character of our neighborhood- Jordan Park. It is one thing to increase height
■ limits on major corridors like Geary, and another to increase them on side streets. These
■ neighborhoods do not have the infrastructure to support that kind of widespread density.

3 ■ I oppose these proposed changes to building height limitations.

Laura Kline

From: [White, Elizabeth \(CPC\)](#)
To: [CPC.HousingElementUpdateEIR](#)
Subject: FW: Draft Environmental Impact Report Vol 1
Date: Tuesday, June 21, 2022 12:38:06 PM

From: Diamond, Susan (CPC) <sue.diamond@sfgov.org>

Sent: Friday, June 17, 2022 1:34 PM

To: Laura Kline <lfklaz@gmail.com>

Cc: Hillis, Rich (CPC) <rich.hillis@sfgov.org>; Tanner, Rachael (CPC) <rachael.tanner@sfgov.org>; White, Elizabeth (CPC) <elizabeth.white@sfgov.org>; Kathrin Moore <mooreurban@gmail.com>

Subject: Re: Draft Environmental Impact Report Vol 1

Hi Laura - Thank you for reaching out. I am cc'ing the Planning Director, the Planning Commission Chair and Vice-Chair as well as the Senior Environmental Planner, so they all receive your thoughts below. Regards, Sue

Sue Diamond

San Francisco Planning Commissioner

sue.diamond@sfgov.org

From: Laura Kline <lfklaz@gmail.com>

Sent: Friday, June 17, 2022 11:54 AM

To: Diamond, Susan (CPC) <sue.diamond@sfgov.org>

Subject: Draft Environmental Impact Report Vol 1

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

Dear Sue,

1 It has come up at our neighborhood Association that there are proposals included in this draft for an increase in height limits on residential side streets up to 85 feet. I am writing to voice my concern about the impact this would have on the neighborhoods of San Francisco, and in particular, the character of our neighborhood- Jordan Park. It is one thing to increase height limits on major
2 corridors like Geary, and another to increase them on side streets. These neighborhoods do not have the infrastructure to support that kind of widespread density.

3 I certainly do not know all the ins and outs of the rules governing development but this proposal seems so out of line with the character of our city and neighborhoods. I wanted to write and note my concern.

Thanks so much and hope you are well. Congratulations on your new responsibilities! Laura

From: Laurance Lee <info@email.actionnetwork.org>

Sent: Wednesday, June 8, 2022 3:08 PM

To: jonas.ionin@sfgov.org

Subject: Hearing item 11: take our housing goals seriously in the Draft EIR

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

Planning Commission Secretary Jonas Ionin,

This Environmental Impact Report does not fully accommodate San Francisco's RHNA requirements. The DEIR seeks to satisfy Mayor Ed Lee's 2017 goal of producing 5,000 homes per year through 2050. But San Francisco's 2023-2030 RHNA is 82,069 units, which is roughly 10,000 homes per year. The DEIR's sites inventory report attempts to make up for this gap by rezoning for 20,000 units "above baseline," but this figure makes the faulty assumption that all units in the pipeline will actually become housing. To the contrary, Professor David Broockman's comment letter indicates that, based on the historical rate at which pipeline units turn into actual housing, San Francisco would need to rezone for 70,000 units above-baseline in order for the necessary inventory to actually come into existence.

By not fully accommodating San Francisco's RHNA, the DEIR sets San Francisco up for an enormous headache. Undershooting on the EIR would put an upper limit on the number of units produced by the city's housing element. This bind, in turn, would give the California Department of Housing and Community Development grounds to reject the city's pipeline/status-quo capacity analysis. In the best case scenario, SF Planning would need to redo the requisite environmental review for a compliant plan prior to the deadline on a very limited time frame. This would mean long nights and early mornings for city staffers struggling to meet a difficult deadline, and it would be unlikely to put SF Planning staff in a position to do their best work. In the worst case scenario, the city would be unable to meet the deadline altogether, thus falling out of compliance—losing eligibility for affordable housing funds, and possibly even losing land use authority.

This course of events is still avertable. If the Planning Department writes an EIR for the proper number of units, San Francisco would be put in a much stronger position to pass a compliant housing element and avoid the consequences of being found out of compliance.

I urge you to heed the DEIR comments written by Professor Chris Elmendorf:

https://url.avanan.click/v2/https://drive.google.com/file/d/10pIS1Sd6T7FdKBkgd5DD1MbOsEnJgbE1/view_.YXAzOnNmZHQyOmE6bzpkYWVhMjUwMGQwZmFhMTNhYTQ3ZDAyNzhjYTY2NTFmNDQ2OjQ0MGU6NDY2OWI5MjlkNmNIMmMxYzRiMzFhMmUyN2U4MDI5MDc5YWVvZGI5NjM4YzZINmE5ZDVkOWRkNGEyNWJiMjcyYjp0OIQ

Laurance Lee

laulemlee@gmail.com

130 Vicksburg St

San Francisco, California 94114

From: [Elena Madsen](#)
To: [CPC.HousingElementUpdateEIR](#); [Hillis, Rich \(CPC\)](#)
Cc: [Stefani, Catherine \(BOS\)](#); [Tanner, Rachael \(CPC\)](#); [Moore, Kathrin \(CPC\)](#); [Diamond, Susan \(CPC\)](#); [Fung, Frank \(CPC\)](#); [Koppel, Joel \(CPC\)](#); [Imperial, Theresa \(CPC\)](#); [Ruiz, Gabriella \(CPC\)](#); [Donovan, Dominica \(BOS\)](#)
Subject: Objections to Building Height Limitations
Date: Friday, July 8, 2022 6:11:40 AM

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

Dear Director of Planning Hillis and Planning Commission Members:

I am writing to express my objection to the proposed revision to the building height limitation upward to 85 feet from the existing limit of 40 feet for Jordan Park as represented by Fig. 2-7 on page 2-25 of the Draft Environmental Impact Report (“EIR”) Volume I for the San Francisco Housing Element 2022 Update” of the General Plan.

• One of the guiding principles behind the housing element is that the development of new housing should be balanced fairly given that the west side has not absorbed much of the high density new residential development in the past. Based upon Fig. 2-7, it appears that the area delineated by Clement, Euclid and Pine Streets to the north; Park Presidio to the west; Anza to the South; and Fillmore to the east (the Delineated Area”) is being targeted to assume a disproportionate percentage of the 50,000 dwelling units (“D.U.s”) that the city is seeking to add by 2050. However, while several other neighborhoods including the Sunset, Noe Valley, Pacific Heights, Presidio Heights, Sea Cliff and the Marina would see more density, they would not be subjected to similar height increases under the proposed plan. Therefore, this plan clearly fails to meet its stated objective and standards of “fairness.”

• Certain zones within the Delineated Area are targeted for even more dramatic building height limits of 200 feet (the former Lucky Penny site, for example) and Geary, as a commercial street and major east/west thoroughfare, is targeted for increased building height limits, which is understandable. However, allowing the height limitation increases to bleed into the neighboring many residential side streets, like Jordan, Commonwealth, Palm and Parker, is not. The Jordan Park Historic District is eligible for the California Register of Historical Resources under “Criterion C (architecture).” The proposed height increase would destroy the existing fabric, scale and character of the neighborhood that qualifies it for consideration as a “Historical Resource.”

• From more technical viewpoint, as it currently exists, the West Side does not have the infrastructure (e.g. roads, parking, facilities, wastewater capacity, etc.) to bear the burden of the proposed development. For example, while the city plans to add 66 new recreational facilities by 2050, and our neighborhoods are currently well served in this regard, only six of the 66 planned new facilities are to be located in the West Side of the City. Thus, the West Side will be underserved in the future should

3
Cont'd

this plan be realized.

4

• The proposed changes would irreparably divide neighborhoods in direct contradiction to one of the stated objectives of the Housing Element. In the section “Impacts and Mitigation Measures” (4.1-19 of the EIR Vol. I). Impact LU-1 dictates that “the proposed actions would not physically divide an established neighborhood.” Specifically, this section states that “the proposed action would not directly or indirectly create any new physical barriers within the city that would divide established neighborhoods.” Permitting buildings to be constructed to a height more than twice the height of the existing homes would directly and indirectly divide Jordan Park! This change would destroy the character of the neighborhood, eliminate vistas into and out of the neighborhood and materially reduce the natural sunlight in the neighborhood! All these impacts are contrary to the stated objectives of the EIR.

5

The Planning Commission must consider/develop other alternatives and scenarios for how the planned growth and development can be more evenly and equitably distributed throughout the city. Regardless of where they seek to increase the housing stock in the city, no residential side streets should have height limitations as great as 85 feet. This will irreparably damage the urban fabric of our city and the character of our neighborhoods.

Sincerely,

Elena Madsen
Jordan Park

From: [David Mahoney](#)
To: [CPC.HousingElementUpdateEIR](#)
Subject: Objection to the Height Restrictions in the Proposed SF Housing Element 2022 Update
Date: Saturday, June 18, 2022 5:04:57 PM

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

Dear Ms. White:

I am writing to express my strongest opposition to the proposed changes in height limits in the “Draft Environmental Impact Report Volume I for the San Francisco Housing Element 2022 Update” of the General Plan. Specifically, as well hidden on page 2-25 (Fig. 2-7), the proposed change in building height restriction from 40 feet to 85 feet in an area delineated by Clement,

Euclid and Pine Streets to the north; Park Presidio to the west; Anza to the South; and Fillmore to the east. This area, which encompasses Jordan Park, Laurel Heights, Anza Vista, Japantown, the Inner Richmond, etc. is being targeted for a disproportional share of the D.U.’s the City is proposing to add. Under the proposed plan, the Sunset, Noe Valley, Pacific Heights, Presidio Heights, Sea Cliff, the Marina, etc. would see more density but no proposed change in height restrictions on their side streets.

Not only does the proposed plan therefore fail to meet its stated objectives but as written would permanently destroy the fabric of the West Side of San Francisco. Increasing the density is understandable, in fact there are already a number of multi-unit buildings in Jordan Park that fit within the current planning parameters. Increasing the height restrictions directly along the main traffic corridors (e.g., Geary Street) is logical but more than doubling the height restrictions along side streets in these neighborhoods is simply poor planning. To propose this in such an invisible way with no public hearing is deceptive, to avoid using harsher language. The infrastructure on the West Side – roads, parking, recreation facilities, wastewater, etc. – are not adequate to support the proposed changes.

I am writing to firmly request that the Planning Commission does not proceed with this ill-advised plan as written. Side street height restrictions in these neighborhoods should be maintained at 40 feet.

David Mahoney
121 Jordan Avenue
San Francisco, CA 94118

From: [Laurie Marks](#)
 To: [CPC.HousingElementUpdateEIR](#); [Hillis, Rich \(CPC\)](#); [Tanner, Rachael \(CPC\)](#); [Moore, Kathrin \(CPC\)](#); [Diamond, Susan \(CPC\)](#); [Fung, Frank \(CPC\)](#); [Koppel, Joel \(CPC\)](#); [Imperial, Theresa \(CPC\)](#); [Ruiz, Gabriella \(CPC\)](#); [Donovan, Dominica \(BOS\)](#); [Stefani, Catherine \(BOS\)](#)
 Cc: [George Chintala - ICE](#)
 Subject: Housing Element RIR Vol. I
 Date: Friday, July 8, 2022 8:52:43 AM

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

Dear Director of Planning Hillis and Planning Commission Members:

I am writing to express my objection to the proposed revision to the building height limitation upward to 85 feet from the existing limit of 40 feet for Jordan Park as represented by Fig. 2-7 on page 2-25 of the Draft Environmental Impact Report ("EIR") Volume I for the San Francisco Housing Element 2022 Update" of the General Plan.

<!--[if !supportLists]-->•<!--[endif]-->One of the guiding principles behind the housing element is that the development of new housing should be balanced fairly given that the west side has not absorbed much of the high density new residential development in the past. Based upon Fig. 2-7, it appears that the area delineated by Clement, Euclid and Pine Streets to the north; Park Presidio to the west; Anza to the South; and Fillmore to the east (the Delineated Area") is being targeted to assume a disproportionate percentage of the 50,000 dwelling units ("D.U.s") that the city is seeking to add by 2050. However, while several other neighborhoods including the Sunset, Noe Valley, Pacific Heights, Presidio Heights, Sea Cliff and the Marina would see more density, they would not be subjected to similar height increases under the proposed plan. Therefore, this plan clearly fails to meet its stated objective and standards of "fairness."

<!--[if !supportLists]-->•<!--[endif]-->Certain zones within the Delineated Area are targeted for even more dramatic building height limits of 200 feet (the former Lucky Penny site, for example) and Geary, as a commercial street and major east/west throughfare, is targeted for increased building height limits, which is understandable. However, allowing the height limitation increases to bleed into the neighboring many residential side streets, like Jordan, Commonwealth, Palm and Parker, is not. The Jordan Park Historic District is eligible for the California Register of Historical Resources under "Criterion C (architecture)." The proposed height increase would destroy the existing fabric, scale and character of the neighborhood that qualifies it for consideration as a "Historical Resource."

<!--[if !supportLists]-->•<!--[endif]-->From more technical viewpoint, as it currently exists, the West Side does not have the infrastructure (e.g. roads, parking, facilities, wastewater capacity, etc.) to bear the burden of the proposed development. For example, while the city plans to add 66 new recreational facilities by 2050, and our neighborhoods are currently well served in this regard, only six of the 66 planned new facilities are to be located in the West Side of the City. Thus, the West Side will be underserved in the future should this plan be realized.

<!--[if !supportLists]-->•<!--[endif]-->The proposed changes would irreparably divide neighborhoods in direct contradiction to one of the stated objectives of the Housing Element. In the section "Impacts and Mitigation Measures" (4.1-19 of the EIR Vol. I). Impact LU-1 dictates that "the proposed actions would not physically divide an established neighborhood." Specifically, this section states that "the proposed action would not directly or indirectly create any new physical barriers within the city that would divide established neighborhoods." Permitting buildings to be constructed to a height more than twice the height of the existing homes would *directly* and *indirectly* divide Jordan Park! This change would destroy the character of the neighborhood, eliminate vistas into and out of the neighborhood and materially reduce the natural sunlight in the neighborhood! All these impacts are contrary to the stated objectives of the EIR.

The Planning Commission must consider/develop other alternatives and scenarios for how the planned growth and development can be more evenly and equitably distributed throughout the city. Regardless of where they seek to increase the housing stock in the city, no residential side streets should have height limitations as great as 85 feet. This will irreparably damage the urban fabric of our city and the character of our neighborhoods.

Sincerely,

Laurie Marks

32 Parker Avenue
34 Parker Avenue

I-Marks_2

From: [Laurie Marks](#)
To: [Donovan, Dominica \(BOS\)](#); [CPC.HousingElementUpdateEIR](#); [Hillis, Rich \(CPC\)](#); [Tanner, Rachael \(CPC\)](#); [Moore, Kathrin \(CPC\)](#); [Diamond, Susan \(CPC\)](#); [Fung, Frank \(CPC\)](#); [Koppel, Joel \(CPC\)](#); [Imperial, Theresa \(CPC\)](#); [Ruiz, Gabriella \(CPC\)](#)
Cc: [George Chintala - ICE](#)
Subject: Proposed Height Limit Changes in Jordan Park
Date: Thursday, June 16, 2022 4:35:12 PM

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

Dear All:

1 ■ It has just come to my attention that there are proposed Height Limit/zoning changes that are incorporated in the “raft Environmental Impact Report Volume I for the San Francisco Housing Element 2022 Update” of the General Plan that impact Jordan Park. They appear to be buried on page 2-25 (Fig. 2-7) within the 600+ page report.

1 ■ We do not have the infrastructure (e.g. roads, parking, facilities and wastewater capacity) to bear this burden. For example, while the city plans to add 66 new recreational facilities by 2050, and our neighborhoods are currently well served in this regard, only six of the 66 planned new facilities are to be located in the West Side of the City. Thus, the West Side will be underserved in the future should this plan continue to gain acceptance.

2 ■ My concern is that this proposal will receive little scrutiny, as it appears that few are aware of this plan (I certainly wasn't).

3 ■ While I believe we need additional housing stock, I would like to see alternatives and scenarios for how the planned growth and development can be more evenly and equitably distributed throughout the city. It would also be helpful to assess how existing commercial space could potentially be re-imagined for a greener future that also enables more housing. Regardless of where we seek to increase the housing stock in the city, no residential side streets should have height limitations as great as 85 feet. This will irreparably damage the urban fabric of our city and the character of our neighborhoods.

4 ■ Thank you for your consideration.

Kind regards,
Laurie

Laurie Marks
32 & 34 Parker Avenue

From: [Richard Martin](#)
To: [CPC.HousingElementUpdateEIR](#); [Hillis, Rich \(CPC\)](#); [Tanner, Rachael \(CPC\)](#); [Moore, Kathrin \(CPC\)](#); [Diamond, Susan \(CPC\)](#); [Fung, Frank \(CPC\)](#); [Koppel, Joel \(CPC\)](#); [Imperial, Theresa \(CPC\)](#); [Ruiz, Gabriella \(CPC\)](#); [Donovan, Dominica \(BOS\)](#); [Stefani, Catherine \(BOS\)](#)
Subject: objections to the height limit revisions
Date: Thursday, July 7, 2022 9:52:40 PM

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

Dear Director of Planning Hillis and Planning Commission Members:

I am writing to express my objection to the proposed revision to the building height limitation upward to 85 feet from the existing limit of 40 feet for Jordan Park as represented by Fig. 2-7 on page 2-25 of the Draft Environmental Impact Report (“EIR”) Volume I for the San Francisco Housing Element 2022 Update” of the General Plan.

• One of the guiding principles behind the housing element is that the development of new housing should be balanced fairly given that the west side has not absorbed much of the high density new residential development in the past. Based upon Fig. 2-7, it appears that the area delineated by Clement, Euclid and Pine Streets to the north; Park Presidio to the west; Anza to the South; and Fillmore to the east (the Delineated Area”) is being targeted to assume a disproportionate percentage of the 50,000 dwelling units (“D.U.s”) that the city is seeking to add by 2050. However, while several other neighborhoods including the Sunset, Noe Valley, Pacific Heights, Presidio Heights, Sea Cliff and the Marina would see more density, they would not be subjected to similar height increases under the proposed plan. Therefore, this plan clearly fails to meet its stated objective and standards of “fairness.”

• Certain zones within the Delineated Area are targeted for even more dramatic building height limits of 200 feet (the former Lucky Penny site, for example) and Geary, as a commercial street and major east/west thoroughfare, is targeted for increased building height limits, which is understandable. However, allowing the height limitation increases to bleed into the neighboring many residential side streets, like Jordan, Commonwealth, Palm and Parker, is not. The Jordan Park Historic District is eligible for the California Register of Historical Resources under “Criterion C (architecture).” The proposed height increase would destroy the existing fabric, scale and character of the neighborhood that qualifies it for consideration as a “Historical Resource.”

• From more technical viewpoint, as it currently exists, the West Side does not have the infrastructure (e.g. roads, parking, facilities, wastewater capacity, etc.) to bear the burden of the proposed development. For example, while the city plans to add 66 new recreational facilities by 2050, and our neighborhoods are currently well served in this regard, only six of the 66 planned new facilities are to be located in the West Side of the City. Thus, the West Side will be underserved in the future should this plan be realized.

4

• The proposed changes would irreparably divide neighborhoods in direct contradiction to one of the stated objectives of the Housing Element. In the section “Impacts and Mitigation Measures” (4.1-19 of the EIR Vol. I). Impact LU-1 dictates that “the proposed actions would not physically divide an established neighborhood.” Specifically, this section states that “the proposed action would not directly or indirectly create any new physical barriers within the city that would divide established neighborhoods.” Permitting buildings to be constructed to a height more than twice the height of the existing homes would directly and indirectly divide Jordan Park! This change would destroy the character of the neighborhood, eliminate vistas into and out of the neighborhood and materially reduce the natural sunlight in the neighborhood! All these impacts are contrary to the stated objectives of the EIR.

5

The Planning Commission must consider/develop other alternatives and scenarios for how the planned growth and development can be more evenly and equitably distributed throughout the city. Regardless of where they seek to increase the housing stock in the city, no residential side streets should have height limitations as great as 85 feet. This will irreparably damage the urban fabric of our city and the character of our neighborhoods.

Sincerely,
Richard Martin (Palm avenue SF)

--

Richard P. Martin
Antony and Isabelle Raubitschek Professor in Classics
Bldg 110, Main Quad, 450 Serra Mall
Stanford, CA 94305-2145
650-723-0479

[Mythologizing Performance \(2020\)](#)

From: Steve Marzo <smarzo@alumni.nd.edu>
Sent: Wednesday, June 08, 2022 9:51 AM
To: CPC-Commissions Secretary <commissions.secretary@sfgov.org>
Subject: Prevent sprawl in the 2022 housing element (file 2019-016230ENV)

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

Planning Commission Staff Commission Affairs,

This Environmental Impact Report fails to recognize the statewide and regional environmental benefits of higher-growth alternatives. On the contrary, the report considers the No Project Alternative environmentally superior as 50,000 less housing units would be planned for (S-5). This couldn't be further detached from reality:

According to a study by Apartment List on 2017 data, the Bay Area and its exurbs had the nation's highest share of super commuters traveling 90 min or more to work. Building less housing units in San Francisco forces people to live in such places where they produce more CO2, displace wildlife, fill wetlands, bulldoze scenic vistas, disrupt the management of wildfire, and congest highways. Building new housing in San Francisco on the other hand would allow those people to take advantage of our public transit systems and live in energetically efficient multi-family units.

Therefore, I ask you to in particular reconsider Impact GHG-1 for the No Project Alternative to reflect the higher greenhouse gas emissions this alternative would cause, and study rezoning for over eighty thousand additional units, as our RHNA requires, which would have significant positive environmental benefits.

I support Professor Chris Elmendorf's comments on the DEIR:

<https://url.avanan.click/v2/> https://drive.google.com/file/d/10pIS1Sd6T7FdKBkgd5DD1MbOsEnJgbE1/view_.YXAzOnNmZHQyOmE6bzo1OWM4ZjQwYjk1ZDE2Y2MwODJkMTNmZjhlYzc5YTYxYT02OjZmOWY6OGFkZDU0ZjEwYmQ4ODVlYzc5ZWY3NGY4MWI0M2M3MDkyNGM3Mzg5Nzg5YWQ5NzZkxZGYyNTAzYjdmZjM2NTZiZTp0OIQ

Steve Marzo
smarzo@alumni.nd.edu
1117 Ocean Ave, Apt 204
San Francisco, California 94112

From: [Mary Ann Massenburg](#)
To: [CPC.HousingElementUpdateEIR](#)
Cc: [Stefani, Catherine \(BOS\)](#); [Donovan, Dominica \(BOS\)](#); [Hillis, Rich \(CPC\)](#); [CPC-Commissions Secretary](#); [Bob Purcell](#)
Subject: Comments on Draft EIR for SF Housing Element 2022
Date: Tuesday, July 12, 2022 1:23:41 PM

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

To Whom It May Concern:

We have been residents of Laurel Heights (near the corner of Laurel and California) for 50 years. We are in strong support of the State and City's goals to create more low-and middle income housing.

In reviewing the Housing Element update, we generally support the placement of this new housing in all well-resourced neighborhoods, including our own. The update also mentions a preference for "small and midsize multi-family buildings." However, in the map on page 185 of the Draft EIR, there appears to be the possibility of 240-300 foot high buildings in the vicinity of Geary and Presidio and the Muni barn. This height limit would be a severe departure from the nearby buildings. Worse, it could be a repeat of the negative consequences of Geneva Towers in SF and other now-discredited experiments in high-rise buildings for low-income housing.

We believe it will be better, in terms of creating more diverse neighborhoods and equitably distributing the environmental impact of construction, transportation and congestion, to build LOWER density housing, in MORE of the well-resourced areas, rather than fewer super dense projects in a few neighborhoods.

We look forward to receiving on-going information and to participating in this opportunity to improve our communities and City.

Sincerely,
Mary Ann Massenburg
Robert D. Purcell
419A Laurel Street
San Francisco, CA 94118

Sent from my iPad

From: [Linda Mathews](#)
To: [CPC.HousingElementUpdateEIR](#); [Hillis, Rich \(CPC\)](#); [Tanner, Rachael \(CPC\)](#); [Moore, Kathrin \(CPC\)](#); [Diamond, Susan \(CPC\)](#); [Fung, Frank \(CPC\)](#); [Koppel, Joel \(CPC\)](#); [Imperial, Theresa \(CPC\)](#); [Ruiz, Gabriella \(CPC\)](#); [Donovan, Dominica \(BOS\)](#); [Stefani, Catherine \(BOS\)](#)
Cc: linda.mathews@yahoo.com
Subject: Objection to proposed revision to the building height limit in Jordan Park
Date: Monday, July 11, 2022 6:26:13 PM

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

Dear Director of Planning Hillis and Planning Commission Members:

I am writing to express my objection to the proposed revision to the building height limitation upward to 85 feet from the existing limit of 40 feet for Jordan Park as represented by Fig. 2-7 on page 2-25 of the Draft Environmental Impact Report ("EIR") Volume I for the San Francisco Housing Element 2022 Update" of the General Plan.

That's more than double what is allowed now.

• One of the guiding principles behind the housing element is that the development of new housing should be balanced fairly given that the west side has not absorbed much of the high density new residential development in the past. Based upon Fig. 2-7, it appears that the area delineated by Clement, Euclid and Pine Streets to the north; Park Presidio to the west; Anza to the South; and Fillmore to the east (the Delineated Area") is being targeted to assume a disproportionate percentage of the 50,000 dwelling units ("D.U.s") that the city is seeking to add by 2050. However, while several other neighborhoods including the Sunset, Noe Valley, Pacific Heights, Presidio Heights, Sea Cliff and the Marina would see more density, they would not be subjected to similar height increases under the proposed plan. Therefore, this plan clearly fails to meet its stated objective and standards of "fairness."

• Certain zones within the Delineated Area are targeted for even more dramatic building height limits of 200 feet (the former Lucky Penny site, for example) and Geary, as a commercial street and major east/west thoroughfare, is targeted for increased building height limits, which is understandable. However, allowing the height limitation increases to bleed into the neighboring many residential side streets, like Jordan, Commonwealth, Palm and Parker, is not. The Jordan Park Historic District is eligible for the California Register of Historical Resources under "Criterion C (architecture)." The proposed height increase would destroy the existing fabric, scale and character of the neighborhood that qualifies it for consideration as a "Historical Resource."

• From more technical viewpoint, as it currently exists, the West Side does not have the infrastructure (e.g. roads, parking, facilities, wastewater capacity, etc.) to bear the burden of the proposed development.

3
Cont'd

For example, while the city plans to add 66 new recreational facilities by 2050, and our neighborhoods are currently well served in this regard, only six of the 66 planned new facilities are to be located in the West Side of the City. Thus, the West Side will be underserved in the future should this plan be realized.

4

- The proposed changes would irreparably divide neighborhoods in direct contradiction to one of the stated objectives of the Housing Element. In the section "Impacts and Mitigation Measures" (4.1-19 of the EIR Vol. I). Impact LU-1 dictates that "the proposed actions would not physically divide an established neighborhood." Specifically, this section states that "the proposed action would not directly or indirectly create any new physical barriers within the city that would divide established neighborhoods." Permitting buildings to be constructed to a height more than twice the height of the existing homes would directly and indirectly divide Jordan Park! This change would destroy the character of the neighborhood, eliminate vistas into and out of the neighborhood and materially reduce the natural sunlight in the neighborhood! All these impacts are contrary to the stated objectives of the EIR.

5

The Planning Commission must consider/develop other alternatives and scenarios for how the planned growth and development can be more evenly and equitably distributed throughout the city. Regardless of where they seek to increase the housing stock in the city, no residential side streets should have height limitations as great as 85 feet. This will irreparably damage the urban fabric of our city and the character of our neighborhoods.

Linda Mathews
D2 resident

From: [Laurie Miller](#)
 To: [CPC.HousingElementUpdateEIR](#)
 Date: Tuesday, July 12, 2022 4:54:19 PM

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

Dear Director of Planning Hillis and Planning Commission Members:

I am writing to express my objection to the proposed revision to the building height limitation upward to 85 feet from the existing limit of 40 feet for Jordan Park as represented by Fig. 2-7 on page 2-25 of the Draft Environmental Impact Report (“EIR”) Volume I for the San Francisco Housing Element 2022 Update” of the General Plan.

• One of the guiding principles behind the housing element is that the development of new housing should be balanced fairly given that the west side has not absorbed much of the high density new residential development in the past. Based upon Fig. 2-7, it appears that the area delineated by Clement, Euclid and Pine Streets to the north; Park Presidio to the west; Anza to the South; and Fillmore to the east (the Delineated Area”) is being targeted to assume a disproportionate percentage of the 50,000 dwelling units (“D.U.s”) that the city is seeking to add by 2050. However, while several other neighborhoods including the Sunset, Noe Valley, Pacific Heights, Presidio Heights, Sea Cliff and the Marina would see more density, they would not be subjected to similar height increases under the proposed plan. Therefore, this plan clearly fails to meet its stated objective and standards of “fairness.”

• Certain zones within the Delineated Area are targeted for even more dramatic building height limits of 200 feet (the former Lucky Penny site, for example) and Geary, as a commercial street and major east/west thoroughfare, is targeted for increased building height limits, which is understandable. However, allowing the height limitation increases to bleed into the neighboring many residential side streets, like Jordan, Commonwealth, Palm and Parker, is not. The Jordan Park Historic District is eligible for the California Register of Historical Resources under “Criterion C (architecture).” The proposed height increase would destroy the existing fabric, scale and character of the neighborhood that qualifies it for consideration as a “Historical Resource.”

• From more technical viewpoint, as it currently exists, the West Side does not have the infrastructure (e.g. roads, parking, facilities, wastewater capacity, etc.) to bear the burden of the proposed development. For example, while the city plans to add 66 new recreational facilities by 2050, and our neighborhoods are currently well served in this regard, only six of the 66 planned new facilities are to be located in the West Side of the City. Thus, the West Side will be underserved in the future should this plan be realized.

• The proposed changes would irreparably divide neighborhoods in direct contradiction to one of the stated objectives of the Housing

4
Cont'd

Element. In the section "Impacts and Mitigation Measures" (4.1-19 of the EIR Vol. I). Impact LU-1 dictates that "the proposed actions would not physically divide an established neighborhood." Specifically, this section states that "the proposed action would not directly or indirectly create any new physical barriers within the city that would divide established neighborhoods." Permitting buildings to be constructed to a height more than twice the height of the existing homes would directly and indirectly divide Jordan Park! This change would destroy the character of the neighborhood, eliminate vistas into and out of the neighborhood and materially reduce the natural sunlight in the neighborhood! All these impacts are contrary to the stated objectives of the EIR.

5

The Planning Commission must consider/develop other alternatives and scenarios for how the planned growth and development can be more evenly and equitably distributed throughout the city. Regardless of where they seek to increase the housing stock in the city, no residential side streets should have height limitations as great as 85 feet. This will irreparably damage the urban fabric of our city and the character of our neighborhoods.

Sincerely,
Laurie Miller

lauriemiller57@gmail.com
415-509-6630

Mary Mogannam
350 Laguna Street
San Francisco, CA 94102

July 11, 2022

Dear Mrs. White:

I'm Mary Mogannam, and I reside in San Francisco. I am writing about the recent Housing Element proposal.

The Element is making a major emphasis on affirmative action policies. However, California banned affirmative action in all government agencies over 20 years ago.

Is the current plan legal? It does not sound like it, and the city may be vulnerable to all kinds of challenges. I urge the Planning Commission to follow all existing laws and regulations.

Sincerely yours,

Mary Mogannam

From: Martin Munoz <info@email.actionnetwork.org>

Sent: Wednesday, June 8, 2022 10:19 AM

To: jonas.ionin@sfgov.org

Subject: Hearing item 11: take our housing goals seriously in the Draft EIR

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

Planning Commission Secretary Jonas Ionin,

This Environmental Impact Report does not fully accommodate San Francisco's RHNA requirements. The DEIR seeks to satisfy Mayor Ed Lee's 2017 goal of producing 5,000 homes per year through 2050. But San Francisco's 2023-2030 RHNA is 82,069 units, which is roughly 10,000 homes per year. The DEIR's sites inventory report attempts to make up for this gap by rezoning for 20,000 units "above baseline," but this figure makes the faulty assumption that all units in the pipeline will actually become housing. To the contrary, Professor David Broockman's comment letter indicates that, based on the historical rate at which pipeline units turn into actual housing, San Francisco would need to rezone for 70,000 units above-baseline in order for the necessary inventory to actually come into existence.

By not fully accommodating San Francisco's RHNA, the DEIR sets San Francisco up for an enormous headache. Undershooting on the EIR would put an upper limit on the number of units produced by the city's housing element. This bind, in turn, would give the California HCD ground to reject the city's pipeline/status-quo capacity analysis. In the best case scenario, SF Planning would need to redo the requisite environmental review for a compliant plan prior to the deadline on a very limited time frame. This would mean long nights and early mornings struggling to meet a difficult deadline, and it would be unlikely to put SF Planning staff in a position to do their best work. In the worst case scenario, the city would be unable to meet the deadline altogether, thus falling out of compliance, losing affordable housing funds, and being exposed to the builder's remedy.

This course of events is still avertable. If the Planning Department writes an EIR for the proper number of units, San Francisco would be put in a much stronger position to pass a compliant housing element and avoid the consequences of being found out of compliance.

I urge you to heed the DEIR comments written by Professor Chris Elmendorf:

<https://url.avanan.click/v2/> <https://drive.google.com/file/d/10pIS1Sd6T7FdKBkgd5DD1MbOsEnJgbE1/view?usp=sharing> .YXAzOnNmZHQyOmE6bzpmZjViMWVjZWQ0ZThmODU1Yzk5NTNIM2ZhNDc1YmJhNDQ0OmJhMWM6YjIxOTc3NDY4YjYzMDNmZDUzNWUxMTBjNjY2Nzg0Njk3YWQ2ZDg4NmJiMDU2MDI2M2YxNTcyNmEwYjRhOWJlNDp0OIQ

Martin Munoz
martinmunozdz@gmail.com
399 Steiner St., Apt. 7
San Francisco, California 94117

From: [CPC-Commissions Secretary](#)
Cc: [Callagy, Alana \(CPC\)](#); [White, Elizabeth \(CPC\)](#); [Feliciano, Josephine \(CPC\)](#)
Subject: FW: HOUSING ELEMENT 2022 DRAFT EIR - Public Comment
Date: Friday, June 10, 2022 8:14:44 AM

Commission Affairs

San Francisco Planning
49 South Van Ness Avenue, Suite 1400, San Francisco, CA 94103
Direct: 628.652.7343 | www.sfplanning.org
[San Francisco Property Information Map](#)

From: Glynis Nakahara <gnakahara@yahoo.com>
Sent: Thursday, June 9, 2022 5:30 PM
To: CPC-Commissions Secretary <commissions.secretary@sfgov.org>
Cc: Lori Yamauchi <lyamauchisf@gmail.com>; Alice Kawahatsu <alidikawa@gmail.com>; Daryl Higashi <dhigashid@gmail.com>; Rosalyn Tonai <rosalyn@njahs.org>; Scott Hamaguchi <scotthama915@gmail.com>; Jeremy Chan <jeremy.lee.chan@gmail.com>; Emily Murase <emurase@japantowntaskforce.org>; Lauren Nosaka <lnosaka@japantowntaskforce.org>
Subject: HOUSING ELEMENT 2022 DRAFT EIR - Public Comment

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

President Tanner, Vice President Moore, and Members of the Planning Commission:


Attached is a record of my public comment today, June 9. (I apologize for the terrible phone connection).

Best regards,

Glynis Nakahara

My name is Glynis Nakahara and I am a community organizer in Japantown.

I first want to thank the Planning Department for their long effort on this opus and for regularly engaging Japantown in good faith. We are most grateful for your outreach to us.

1  I am concerned that the Draft EIR (DEIR) exerts extreme development pressure and impacts on Japantown. Japantown is a City Cultural District and one of only three

remaining in the United States and without care and rigorous vetting and collaboration with the community – especially with proposed measures to facilitate entitlements and permitting – I worry about the sustainability of our community. I support the need of every neighborhood to share the responsibility to address the housing crises, however, the DEIR includes proposals that seem to overburden Japantown.

I would like to note the following in particular.

- Figure 2-7 Shows an increase by almost 5 times in height limits from the current 50 feet to 240 feet (on page 185) and exceeds the 85' height limits proposed in the Housing Element report in January 2022. It also doubles the height limit north of the Japan Center to 85'.
- It proposes a 108% increase in Japantown's housing supply compared to current numbers and designate Japantown as a Housing Sustainability District
- These proposals will exert significant impacts to Japantown and yet there are no analyses related to these impacts as part of the EIR.
- At the same time, the Housing Element includes policies that seek to redress harm to the Japanese community caused by past discriminatory government actions, including Urban Renewal, which reduced Japantown from 40 blocks to its 6 blocks today and displaced hundreds of Japanese American businesses and families. How will this priority align with the aforementioned proposals?

If the Housing Element provides a path for subsequent legislation and policy that leads to massive development in Japantown without measures in place to protect vulnerable cultural assets – both tangible and intangible – and a commitment to early collaboration and vetting with the community on such developments, I see the end of Japantown. After the evisceration of WWII and Redevelopment, I doubt our community can endure another well-intentioned, government sanctioned solution.

Thank you for your time today.

GN

From: [Shannon O'Neill](#)
To: [CPC.HousingElementUpdateEIR](#); [Hillis, Rich \(CPC\)](#); [Tanner, Rachael \(CPC\)](#); [Moore, Kathrin \(CPC\)](#); [Diamond, Susan \(CPC\)](#); [Fung, Frank \(CPC\)](#); [Koppel, Joel \(CPC\)](#); [Imperial, Theresa \(CPC\)](#); [Ruiz, Gabriella \(CPC\)](#); [Donovan, Dominica \(BOS\)](#); [Stefani, Catherine \(BOS\)](#)
Subject: Objection to Height Limit Increase in Jordan Park
Date: Sunday, July 10, 2022 6:27:38 PM

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

Dear Director of Planning Hillis and Planning Commission Members:

My family and I are long time residents of Jordan Park, where we are raising our family. I am writing to express my strong objection to the proposed revision to the building height limitation upward to 85 feet from the existing limit of 40 feet for Jordan Park as represented by Fig. 2-7 on page 2-25 of the Draft Environmental Impact Report ("EIR") Volume I for the San Francisco Housing Element 2022 Update" of the General Plan.

While I completely understand the importance of densifying the city in order to provide much needed affordable and market rate housing, it seems that can be done along certain corridors — like California and Geary — vs destroying the character and fabric of the neighborhoods that make San Francisco so special.

It is hard to understand why the proposed plan so disproportionately impacts our neighborhood where we are not only absorbing a larger percentage of the dwelling unit goal (for such a small neighborhood), but are also being subject to height increases (40 feet to 85 feet) that other neighborhoods such as the Sunset, Noe Valley, Pacific Heights, Presidio Heights, Sea Cliff and the Marina are not being subject to. The current, plan, is simply failing to meet its own stated objective of fairness. Further, the city has always gone out of its way to ensure that the character of neighborhoods are maintained (by enacting extremely strict zoning rules regarding home renovations, etc) - so how can we understand the doubling of height in a neighborhood where not a single building is over 3 or 4 stories against a long tradition of maintaining the character of the architecture? Not only is this not fair, it will destroy our neighborhood - and unless you plan to destroy all the neighborhoods in San Francisco, then again, the proposed plan is not even close to "fair."

Again, there are corridors that lend themselves to densification - and, in particular, the zones that are targeted for even higher building heights along Geary make sense. However, allowing this height limitation increase to extend into the neighboring residential side streets like Jordan, Commonwealth, Palm and Parker, is incomprehensible. The Jordan Park Historic District is eligible for the California Register of Historical Resources under "Criterion C (architecture)." The proposed height increase would destroy the existing fabric, scale and character of the neighborhood that qualifies it for consideration as a "Historical Resource." Further, the proposed changes would irreparably divide our neighborhood, again, in contradiction to one of the stated objectives of the Housing Element that "proposed actions would not divide an established neighborhood."

4

Further, the West Side does not have the infrastructure to bear the burden of the proposed development. Responsible planning should ensure that the investment in infrastructure is made as a condition to adding densification. Doing so in reverse is doing a disservice to the entire resident population of the West Side.

5

There is no doubt that the Planning Commission will have to make tradeoffs to meet the city's housing goals. Increasing height limitations along California and Geary which border our small neighborhood, make sense - as all neighborhoods in the city need to participate/do their part. Drastically increasing height limitations on the residential side streets which is in fact completely adverse to the stated goals of the EIR do not. No residential side street should have an 85 foot height limit.

Please consider/develop other alternatives for how the planed growth and and development can be more evenly and equitably distributed throughout the city.

Thank you for your service to our beautiful city.

Sincerely,

Shannon and Shawn O'Neill
Palm Avenue

From: [Donovan, Dominica \(BOS\)](#)
To: [Julie Paul](#)
Cc: [CPC.HousingElementUpdateEIR](#)
Subject: RE: Proposed Height Limit changes in JP
Date: Wednesday, June 22, 2022 10:50:27 AM

Hi Julie,

Thank you for reaching out to the Supervisor regarding this. At this time, it is best to submit public comment on the Housing Element to cpc.housingelementupdateeir@sfgov.org (I've also cc'd the address). **The public comment period has been extended to July 12.** Please feel free to keep me copied on the comment that gets submitted to the Planning Department.

Thank you!

Dominica Donovan
Legislative Aide, District 2

From: Julie Paul <juliepaul164@gmail.com>
Sent: Tuesday, June 21, 2022 1:59 PM
To: Donovan, Dominica (BOS) <dominica.donovan@sfgov.org>
Subject: Fwd: Proposed Height Limit changes in JP
Importance: High

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

Hi Catherine,

I know our city desperately needs to build more housing, but am concerned about the specific impact on my neighborhood. It would make sense to me that buildings on Geary and California could be 85' (currently the height limit is 45'), but not on the sides streets of Jordan Park. I am also concerned that there has been a lack of communication about the impact of this proposed housing plan with neighborhood associations and residents. Can you please let me know what you recommend residents do at this point if we are not in favor of all aspects of the proposal?

Hope you're well,

Julie

Julie Paul

Founder

hearditfromafriend.com

Begin forwarded message:

From: Owen L. Hart <olhart120@gmail.com>
Subject: Proposed Height Limit changes in JP
Date: June 16, 2022 at 3:38:10 PM PDT
To: Julie and Mike Paul <juliepaul164@gmail.com>
Reply-To: Owen L. Hart <olhart120@gmail.com>

Dear Members:

There is an urgent matter that I wanted to bring to your attention. I was recently made aware of some proposed Height Limit/zoning changes that are

incorporated in the “Draft Environmental Impact Report Volume I for the San Francisco Housing Element 2022 Update” of the General Plan. Buried on page 2-25 (Fig. 2-7) within the 600+ page report (which can be accessed online at [SFplanning.org](https://sfplanning.org)) is a map outlining proposed changes to the building height limitations for San Francisco’s various neighborhoods. Upon reviewing this graphic, I was shocked to see proposed changes that would increase the current building height restriction from 40 feet to 85 feet for much of Jordan Park! It appears that the area delineated by Clement, Euclid and Pine Streets to the north; Park Presidio to the west; Anza to the South; and Fillmore to the east is being targeted to assume a disproportionate percentage of the 50,000 dwelling units (“D.U.s”) that the city is seeking to add by 2050. Certain other zones within or adjacent to our neighborhoods are targeted for even more dramatic building height limits of 200 feet (the former Lucky Penny site, for example). So, the character of Jordan Park, Laurel Heights, Anza Vista, Japantown and the Inner Richmond all could be dramatically and adversely impacted under this plan, as it could basically turn our neighborhoods into a West Side version of Mission Bay.

The theory behind the housing element is that the development of new housing should be balanced fairly given that the west side has not absorbed much of the high density new residential development in the past. Geary, as a commercial corridor and major east/west thoroughfare, is targeted for increased building height limits, which is understandable; but so are many residential side streets, like Jordan, Commonwealth, Palm and Parker, which is not. Moreover, several neighborhoods would see more density, but no height increases (on their side streets), under the proposed plan, including the Sunset, Noe Valley, Pacific Heights, Presidio Heights, Sea Cliff, Marina. Therefore, this plan clearly fails to meet its stated objectives and standard.

From a more technical viewpoint, we do not have the infrastructure (e.g. roads, parking, facilities and wastewater capacity) to bear this burden. For example, while the city plans to add 66 new recreational facilities by 2050, and our neighborhoods are currently well served in this regard, only six of the 66 planned new facilities are to be located in the West Side of the City. Thus, the West Side will be underserved in the future should this plan continue to gain acceptance.

My concern is that this proposal will receive little scrutiny, as it appears that few are aware of this plan (I certainly wasn't). I have shared my concerns with the Laurel Heights Improvement Association who indicated that they were previously not aware of this proposal either.

I also have shared my concerns with Supervisor Stefani’s office and plan to

alert the planning commission that we are against this proposal. We also will push to have the Planning Commission consider/develop other alternatives and scenarios for how the planned growth and development can be more evenly and equitably distributed throughout the city. Regardless of where they seek to increase the housing stock in the city, no residential side streets should have height limitations as great as 85 feet. This will irreparably damage the urban fabric of our city and the character of our neighborhoods.

The comment period for this report ends June 20th. We are going to ask for an extension as this element of the study has not been adequately disclosed to San Francisco's neighborhood associations and citizens. Regardless, I encourage all of you to let Supervisor Stefani's office and our planning commission and commissioners know your views on this proposal. Time is of the essence here so please act quickly. The relevant email addresses are listed below (please note, the links do not copy into our eChapters listing, so you likely have to cut and paste them into your emails).

Best,

Owen

Elizabeth White: CPC.HousingElementUpdateEIR@sfgov.org

Rich Hillis, Director of Planning: rich.hillis@sfgov.org

Rachael Tanner, President: Rachael.Tanner@sfgov.org

Kathrin Moore, Vice-President: kathrin.moore@sfgov.org

Sue Diamond, Commissioner: sue.diamond@sfgov.org

Frank S. Fung, Commissioner: frank.fung@sfgov.org

Joel Koppel, Commissioner: joel.koppel@sfgov.org

Theresa Imperial, Commissioner: theresa.imperial@sfgov.org

Gabriella Ruiz, Commissioner: gabriella.ruiz@sfgov.org

Donovan, Dominica, Legislative Aide, Office of Supervisor Catherine Stefani: dominica.donovan@sfgov.org

This message was sent by eChapters.com on behalf of Jordan Park Improvement Assoc., based on an opt-in mailing list managed by Jordan Park Improvement Assoc.. If you believe you have received this mail in error, please contact olhart120@gmail.com and ask to have your address removed from this mailing list.

From: [Julie Paul](#)
To: [CPC.HousingElementUpdateEIR](#); [Hillis, Rich \(CPC\)](#); [Tanner, Rachael \(CPC\)](#); [Moore, Kathrin \(CPC\)](#); [Diamond, Susan \(CPC\)](#); [Fung, Frank \(CPC\)](#); [Koppel, Joel \(CPC\)](#); [Imperial, Theresa \(CPC\)](#); [Ruiz, Gabriella \(CPC\)](#); [Donovan, Dominica \(BOS\)](#); [CPC.HousingElementUpdateEIR](#)
Subject: Housing Element 2022
Date: Tuesday, July 5, 2022 12:19:48 PM
Importance: High

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

Dear Planning Commission,

I know the urgency to build more housing in our city, and fully support the effort in principle. I think fourplexes on any neighborhood street and sixplexes on corner lots is mostly fine. But when it comes to major changes in height limits on neighborhood streets, it is an absolute no from me. San Francisco is unique in the character of its neighborhoods, and this is what makes it so special. We've considered moving to Marin, but have concluded it has been ruined by developers who did not adhere to any form of architectural integrity.

1 I live in Jordan Park and chose this neighborhood because of its distinctive feel. We are seven houses in from Geary, and look out on apartment buildings in our backyard. When I see new housing going up on Geary and California, I generally applaud it. I'm not sure about your proposal to raise the building height limit to 85', but Geary and California are transit corridor streets. They can handle this type of development in areas where there is not a concentration of homes. Neighborhood streets such as Jordan and Commonwealth absolutely cannot handle the mass—it would destroy our neighborhood, and I protest loudly to any proposal to increase the building height limits.

Thank you for your consideration,
Julie Paul

Julie Paul

Founder

hearditfromafriend.com

Begin forwarded message:

From: Owen L. Hart <olhart120@gmail.com>
Subject: Update on extension of Comment period for the EIR
Date: June 21, 2022 at 5:40:18 PM PDT
To: Julie and Mike Paul <juliepaul164@gmail.com>
Reply-To: Owen L. Hart <olhart120@gmail.com>

Dear Members:

Thank you all for responding so rapidly to the proposed changes to the height limitations included in the Housing Element 2022 Update Draft Environmental Impact Report (EIR). Due to the feedback the Planning

Commission received they have extended the comment period until 5:00 PM July 12, 2022 (please see the notice below). Please pass along your thoughts on the proposals to the email address included in the announcement below. As per my previous email, I suggest you also CC the Planning Commission head and Planning Commission members.

Best,

Owen

Community Members –

This email is to inform you that the public may now comment on the accuracy and adequacy of the Housing Element 2022 Update Draft Environmental Impact Report (EIR) until Tuesday, July 12 at 5pm.

You may provide comments on the Draft EIR concerning the proposed project's environmental effects by contacting Elizabeth White via email (CPC.HousingElementUpdateEIR@sfgov.org), phone (628) 652-7557, or by mail at 49 South Van Ness Avenue, Suite 1400, San Francisco, CA 94103

This message was sent by eChapters.com on behalf of Jordan Park Improvement Assoc., based on an opt-in mailing list managed by Jordan Park Improvement Assoc.. If you believe you have received this mail in error, please contact olhart120@gmail.com and ask to have your address removed from this mailing list.

From: [Julie Paul](#)
To: [CPC.HousingElementUpdateEIR](#); [Hillis, Rich \(CPC\)](#); [Tanner, Rachael \(CPC\)](#); [Moore, Kathrin \(CPC\)](#); [Diamond, Susan \(CPC\)](#); [Fung, Frank \(CPC\)](#); [Koppel, Joel \(CPC\)](#); [Imperial, Theresa \(CPC\)](#); [Ruiz, Gabriella \(CPC\)](#); [Donovan, Dominica \(BOS\)](#); [Stefani, Catherine \(BOS\)](#)
Subject: Objections to the Raising Height Limits in Jordan Park
Date: Saturday, July 9, 2022 8:36:27 PM

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

Dear Director of Planning Hillis and Planning Commission Members:

I am writing to express my VERY STRONG objections to the proposed revision to the building height limitation upward to 85 feet from the existing limit of 40 feet for Jordan Park as represented by Fig. 2-7 on page 2-25 of the Draft Environmental Impact Report (“EIR”) Volume I for the San Francisco Housing Element 2022 Update” of the General Plan.

• One of the guiding principles behind the housing element is that the development of new housing should be balanced fairly given that the west side has not absorbed much of the high density new residential development in the past. Based upon Fig. 2-7, it appears that the area delineated by Clement, Euclid and Pine Streets to the north; Park Presidio to the west; Anza to the South; and Fillmore to the east (the Delineated Area”) is being targeted to assume a disproportionate percentage of the 50,000 dwelling units (“D.U.s”) that the city is seeking to add by 2050. However, while several other neighborhoods including the Sunset, Noe Valley, Pacific Heights, Presidio Heights, Sea Cliff and the Marina would see more density, they would not be subjected to similar height increases under the proposed plan. Therefore, this plan clearly fails to meet its stated objective and standards of fairness

• Certain zones within the Delineated Area are targeted for even more dramatic building height limits of 200 feet (the former Lucky Penny site, for example) and Geary, as a commercial street and major east/west thoroughfare, is targeted for increased building height limits, which is understandable. However, allowing the height limitation increases to bleed into the neighboring many residential side streets, like Jordan, Commonwealth, Palm and Parker, is not. The Jordan Park Historic District is eligible for the California Register of Historical Resources under “Criterion C (architecture).” The proposed height increase would destroy the existing fabric, scale and character of the neighborhood that qualifies it for consideration as a “Historical Resource.”

• From more technical viewpoint, as it currently exists, the West Side does not have the infrastructure (e.g. roads, parking, facilities, wastewater capacity, etc.) to bear the burden of the proposed development. For example, while the city plans to add 66 new recreational facilities by 2050, and our neighborhoods are currently well served in this regard, only six of the 66 planned new facilities are to be located in the West Side of the City. Thus, the West Side will be underserved in the future should

3
Cont'd ▲
■ this plan be realized.

4
■
■ • The proposed changes would irreparably divide neighborhoods in direct contradiction to one of the stated objectives of the Housing Element. In the section “Impacts and Mitigation Measures” (4.1-19 of the EIR Vol. I). Impact LU-1 dictates that “the proposed actions would not physically divide an established neighborhood.” Specifically, this section states that “the proposed action would not directly or indirectly create any new physical barriers within the city that would divide established neighborhoods.” Permitting buildings to be constructed to a height more than twice the height of the existing homes would directly and indirectly divide Jordan Park! This change would destroy the character of the neighborhood, eliminate vistas into and out of the neighborhood and materially reduce the natural sunlight in the neighborhood! All these impacts are contrary to the stated objectives of the EIR.

5
■
■ The Planning Commission must consider/develop other alternatives and scenarios for how the planned growth and development can be more evenly and equitably distributed throughout the city. Regardless of where they seek to increase the housing stock in the city, no residential side streets should have height limitations as great as 85 feet. This will irreparably damage the urban fabric of our city and the character of our neighborhoods.

Sincerely,

Julie Paul

Julie Paul

Founder

hearditfromafriend.com

From: [Mike Paul](#)
To: [CPC.HousingElementUpdateEIR](#); [Hillis, Rich \(CPC\)](#); [Tanner, Rachael \(CPC\)](#); [Moore, Kathrin \(CPC\)](#); [Diamond, Susan \(CPC\)](#); [Fung, Frank \(CPC\)](#); [Koppel, Joel \(CPC\)](#); [Imperial, Theresa \(CPC\)](#); [Ruiz, Gabriella \(CPC\)](#); [Donovan, Dominica \(BOS\)](#)
Subject: IMPORTANT: Housing Element 2022
Date: Tuesday, July 5, 2022 1:11:24 PM

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

Dear Planning Commission,

I know the urgency to build more housing in our city, and fully support the effort in principle. I think fourplexes on any neighborhood street and sixplexes on corner lots is mostly fine. But when it comes to major changes in height limits on neighborhood streets, it is an absolute no from me. San Francisco is unique in the character of its neighborhoods, and this is what makes it so special. We've considered moving to Marin, but have concluded it has been ruined by developers who did not adhere to any form of architectural integrity.

I live in Jordan Park and chose this neighborhood because of its distinctive feel. We are seven houses in from Geary, and look out on apartment buildings in our backyard. When I see new housing going up on Geary and California, I generally applaud it. I'm not sure about your proposal to raise the building height limit to 85', but Geary and California are transit corridor streets. They can handle this type of development in areas where there is not a concentration of homes. Neighborhood streets such as Jordan and Commonwealth absolutely cannot handle the mass—it would destroy our neighborhood, and I protest loudly to any proposal to increase the building height limits.

Thank you for your consideration,
Mike Paul

From: [Mike Paul](#)
To: [CPC.HousingElementUpdateEIR](#); [Hillis, Rich \(CPC\)](#); [Tanner, Rachael \(CPC\)](#); [Moore, Kathrin \(CPC\)](#); [Diamond, Susan \(CPC\)](#); [Fung, Frank \(CPC\)](#); [Koppel, Joel \(CPC\)](#); [Imperial, Theresa \(CPC\)](#); [Ruiz, Gabriella \(CPC\)](#); [Donovan, Dominica \(BOS\)](#); [Stefani, Catherine \(BOS\)](#)
Subject: Objections to the Raising Height Limits in Jordan Park
Date: Sunday, July 10, 2022 2:25:33 PM
Attachments: [img-5d0d7fdf1692e.png](#)

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

Dear Director of Planning Hillis and Planning Commission Members:

I am writing to express my VERY STRONG objections to the proposed revision to the building height limitation upward to 85 feet from the existing limit of 40 feet for Jordan Park as represented by Fig. 2-7 on page 2-25 of the Draft Environmental Impact Report (“EIR”) Volume I for the San Francisco Housing Element 2022 Update” of the General Plan.

• One of the guiding principles behind the housing element is that the development of new housing should be balanced fairly given that the west side has not absorbed much of the high density new residential development in the past. Based upon Fig. 2-7, it appears that the area delineated by Clement, Euclid and Pine Streets to the north; Park Presidio to the west; Anza to the South; and Fillmore to the east (the Delineated Area”) is being targeted to assume a disproportionate percentage of the 50,000 dwelling units (“D.U.s”) that the city is seeking to add by 2050. However, while several other neighborhoods including the Sunset, Noe Valley, Pacific Heights, Presidio Heights, Sea Cliff and the Marina would see more density, they would not be subjected to similar height increases under the proposed plan. Therefore, this plan clearly fails to meet its stated objective and standards of fairness

• Certain zones within the Delineated Area are targeted for even more dramatic building height limits of 200 feet (the former Lucky Penny site, for example) and Geary, as a commercial street and major east/west thoroughfare, is targeted for increased building height limits, which is understandable. However, allowing the height limitation increases to bleed into the neighboring many residential side streets, like Jordan, Commonwealth, Palm and Parker, is not. The Jordan Park Historic District is eligible for the California Register of Historical Resources under “Criterion C (architecture).” The proposed height increase would destroy the existing fabric, scale and character of the neighborhood that qualifies it for consideration as a “Historical Resource.”

• From more technical viewpoint, as it currently exists, the West Side does not have the infrastructure (e.g. roads, parking, facilities, wastewater capacity, etc.) to bear the burden of the proposed development. For example, while the city plans to add 66 new recreational facilities by 2050, and our neighborhoods are currently well served in this regard, only six of the 66 planned new facilities are to be located in the West Side of the City. Thus, the West Side will be underserved in the future should

3
Cont'd this plan be realized.

4
 • The proposed changes would irreparably divide neighborhoods in direct contradiction to one of the stated objectives of the Housing Element. In the section “Impacts and Mitigation Measures” (4.1-19 of the EIR Vol. I). Impact LU-1 dictates that “the proposed actions would not physically divide an established neighborhood.” Specifically, this section states that “the proposed action would not directly or indirectly create any new physical barriers within the city that would divide established neighborhoods.” Permitting buildings to be constructed to a height more than twice the height of the existing homes would directly and indirectly divide Jordan Park! This change would destroy the character of the neighborhood, eliminate vistas into and out of the neighborhood and materially reduce the natural sunlight in the neighborhood! All these impacts are contrary to the stated objectives of the EIR.

5
 The Planning Commission must consider/develop other alternatives and scenarios for how the planned growth and development can be more evenly and equitably distributed throughout the city. Regardless of where they seek to increase the housing stock in the city, no residential side streets should have height limitations as great as 85 feet. This will irreparably damage the urban fabric of our city and the character of our neighborhoods.

Sincerely,



Julie Paul

Founder

hearditfromafriend.com

From: Jessica Perla <jessica@jperla.com>
Sent: Wednesday, June 08, 2022 11:22 AM
To: CPC-Commissions Secretary <commissions.secretary@sfgov.org>
Subject: Prevent sprawl in the 2022 housing element (file 2019-016230ENV)

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

Planning Commission Staff Commission Affairs,

This Environmental Impact Report fails to recognize the statewide and regional environmental benefits of higher-growth alternatives. On the contrary, the report considers the No Project Alternative environmentally superior as 50,000 less housing units would be planned for (S-5). This couldn't be further detached from reality:

According to a study by Apartment List on 2017 data, the Bay Area and its exurbs had the nation's highest share of super commuters traveling 90 min or more to work. Building less housing units in San Francisco forces people to live in such places where they produce more CO2, displace wildlife, fill wetlands, bulldoze scenic vistas, disrupt the management of wildfire, and congest highways. Building new housing in San Francisco on the other hand would allow those people to take advantage of our public transit systems and live in energetically efficient multi-family units.

Therefore, I ask you to in particular reconsider Impact GHG-1 for the No Project Alternative to reflect the higher greenhouse gas emissions this alternative would cause, and study rezoning for over eighty thousand additional units, as our RHNA requires, which would have significant positive environmental benefits.

I support Professor Chris Elmendorf's comments on the DEIR:

https://url.avanan.click/v2/https://drive.google.com/file/d/10plS1Sd6T7FdKBkgd5DD1MbOsEnJgbE1/view_.YXAzOnNmZHQyOmE6bzo2ZDMzOTMxNDZmMjRkNDJiM2UyNWQwYjMzMDE5YmY2Mzo2OjA4NjU6ODVIMjVhYzdkNTFiNDIxNGRjN2JiNDUzYzM2ZWZmMzFmNzY5N2Y4ZDFmOGM2N2FkMmlwZmNkMzEzMTZkZTA0MTp0OIQ

Jessica Perla
jessica@jperla.com
1010 16TH ST, APT 370
San Francisco, California 94107

From: Brandon Powell <info@email.actionnetwork.org>
Sent: Wednesday, June 8, 2022 10:04 AM
To: jonas.ionin@sfgov.org
Subject: Hearing item 11: take our housing goals seriously in the Draft EIR

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

Planning Commission Secretary Jonas Ionin,

This Environmental Impact Report does not fully accommodate San Francisco's RHNA requirements. The DEIR seeks to satisfy Mayor Ed Lee's 2017 goal of producing 5,000 homes per year through 2050. But San Francisco's 2023-2030 RHNA is 82,069 units, which is roughly 10,000 homes per year. The DEIR's sites inventory report attempts to make up for this gap by rezoning for 20,000 units "above baseline," but this figure makes the faulty assumption that all units in the pipeline will actually become housing. To the contrary, Professor David Broockman's comment letter indicates that, based on the historical rate at which pipeline units turn into actual housing, San Francisco would need to rezone for 70,000 units above-baseline in order for the necessary inventory to actually come into existence.

By not fully accommodating San Francisco's RHNA, the DEIR sets San Francisco up for an enormous headache. Undershooting on the EIR would put an upper limit on the number of units produced by the city's housing element. This bind, in turn, would give the California HCD ground to reject the city's pipeline/status-quo capacity analysis. In the best case scenario, SF Planning would need to redo the requisite environmental review for a compliant plan prior to the deadline on a very limited time frame. This would mean long nights and early mornings struggling to meet a difficult deadline, and it would be unlikely to put SF Planning staff in a position to do their best work. In the worst case scenario, the city would be unable to meet the deadline altogether, thus falling out of compliance, losing affordable housing funds, and being exposed to the builder's remedy.

This course of events is still avertable. If the Planning Department writes an EIR for the proper number of units, San Francisco would be put in a much stronger position to pass a compliant housing element and avoid the consequences of being found out of compliance.

I urge you to heed the DEIR comments written by Professor Chris Elmendorf:

<https://url.avanan.click/v2/> https://drive.google.com/file/d/10pIS1Sd6T7FdKBkgd5DD1MbOsEnJgbE1/view_.YXAzOnNmZHQyOmE6bzphOWE4YmNjNmlyNmM5ZGU2OTUyMjZjNzgxZGZiNjJjNTc0Ojk3ZGM6NzZmZmQwMDYyMWE1NmQ3YTl2MDAwOTMyNGRINTc4OTI3MjBjM2U1MWJIMzVIOWYyOTNmMTdhYWlxMzA3MGQ5YTp0OIQ

Brandon Powell
brandonpowell@mac.com
32 Aztec St.
San Francisco, California 94110

From: [Lauren Pressman \(Greenfield\)](#)
To: [CPC.HousingElementUpdateEIR](#); [Hillis, Rich \(CPC\)](#); [Tanner, Rachael \(CPC\)](#); [Moore, Kathrin \(CPC\)](#); [Diamond, Susan \(CPC\)](#); [Fung, Frank \(CPC\)](#); [Koppel, Joel \(CPC\)](#); [Imperial, Theresa \(CPC\)](#); [Ruiz, Gabriella \(CPC\)](#); [Donovan, Dominica \(BOS\)](#); [Stefani, Catherine \(BOS\)](#)
Subject: Objection to Height Limit Increase in Jordan Park
Date: Sunday, July 10, 2022 3:02:38 PM

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

Dear Director of Planning Hillis and Planning Commission Members:

My family and I are long time residents of Jordan Park, where we are raising our three children. I am writing to express my strong objection to the proposed revision to the building height limitation upward to 85 feet from the existing limit of 40 feet for Jordan Park as represented by Fig. 2-7 on page 2-25 of the Draft Environmental Impact Report ("EIR") Volume I for the San Francisco Housing Element 2022 Update" of the General Plan.

While I completely understand the importance of densifying the city in order to provide much needed affordable and market rate housing, it seems that can be done along certain corridors vs destroying the character and fabric of the neighborhoods that make San Francisco so special.

It is hard to understand why the proposed plan so disproportionately impacts our neighborhood where we are not only absorbing a larger percentage of the dwelling unit goal, but are also being subject to height increases (40 feet to 85 feet) that other neighborhoods such as the Sunset, Noe Valley, Pacific Heights, Presidio Heights, Sea Cliff and the Marina are not being subject to. The current, plan, is simply failing to meet its own stated objective of fairness. Further, the city has always gone out of its way to ensure that the character of neighborhoods are maintained (by enacting extremely strict zoning rules regarding home renovations, etc) - so how can we understand the doubling of height in a neighborhood where not a single building is over 3 or 4 stories against a long tradition of maintaining the character of the architecture? Not only is this not fair, it will destroy our neighborhood - and unless you plan to destroy all the neighborhoods in San Francisco, then again, the proposed plan is not even close to "fair."

Again, there are corridors that lend themselves to densification - and, in particular, the zones that are targeted for even higher building heights along Geary make sense. However, allowing this height limitation increase to extend into the neighboring residential side streets like Jordan, Commonwealth, Palm and Parker, is incomprehensible. The Jordan Park Historic District is eligible for the California Register of Historical Resources under "Criterion C (architecture)." The proposed height increase would destroy the existing fabric, scale and character of the neighborhood that qualifies it for consideration as a "Historical Resource." Further, the proposed changes would irreparably divide our neighborhood, again, in contradiction to one of the stated objectives of the Housing Element that "proposed actions would not divide an

3
Cont'd

established neighborhood."

4

Further, the West Side does not have the infrastructure to bear the burden of the proposed development. Responsible planning should ensure that the investment in infrastructure is made as a condition to adding densification. Doing so in reverse is doing a disservice to the entire resident population of the West Side.

5

There is no doubt that the Planning Commission will have to make tradeoffs to meet the city's housing goals. Increasing height limitations along California and Geary which border our small neighborhood, make sense - as all neighborhoods in the city need to participate/do their part. Drastically increasing height limitations on the residential side streets which is in fact completely adverse to the stated goals of the EIR do not. No residential side street should have an 85 foot height limit.

Please consider/develop other alternatives for how the planed growth and and development can be more evenly and equitably distributed throughout the city.

Thank you for your service to our beautiful city.

Sincerely,

Lauren Pressman Greenfield

From: Stacey Randecker <stacey@randecker.com>
Sent: Thursday, June 9, 2022 10:41 AM
To: CPC-Commissions Secretary <commissions.secretary@sfgov.org>
Subject: Item 11 this week: Build infill housing. Save the planet.

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

Planning Commission Staff Commission Affairs,

I'm using a template because it's GOOD. My personal add is that as a single mom of two teens, I want to be able to afford to stay in the city that I love. I also want them to be able to live here in the future if they want. That will NEVER happen unless there are massive amounts of all types of dense housing built. True affordability comes from having enough so that prices are not driven up.

Build infill. Build on parking lots and gas stations. Build on our EIGHT (inequitable and environmentally damaging) golf courses. Build like our lives depend upon it. Because dense cities reduce reliance on cars, Increase funding for transit, and help cool the planet. 82,069 is THE FLOOR, not the ceiling. BUILD!!

1 The Draft Environmental Impact Report (topic 2019-016230ENV) does not adequately address the transportation impacts of building more housing, especially on Vehicle Miles Traveled (VMT). Transportation is an important topic because "San Francisco has many more jobs than homes; as a result, workers must commute into San Francisco each day to reach their jobs" (4.1-68). The DEIR further states that "on average, people living or working in San Francisco have lower levels of VMT per capita than people living or working elsewhere in the nine-county San Francisco Bay Area region" (4.4-12). The message is clear that SF commuters impact the environment less than other residents and workers in the Bay Area region. This means that any environmental analysis should also consider the impact of a project and alternatives on the nine-county Bay Area as a whole.

However, the DEIR fails to reflect regional VMT in its analysis of which alternative is environmentally superior. The DEIR claims that the No Project Alternative is environmentally superior because it would construct fewer housing units (S-5); this claim is at odds with the impact of GHG emissions from the No Project Alternative. The DEIR determines that "although regional total daily VMT would increase because of the additional housing, the percentage increase would be less than what would be anticipated if the additional housing were located in an area with per capita VMT that is higher than the regional average." In other words, the No Project Alternative would lead to higher regional VMT and therefore greenhouse gas emissions because it would not decrease the number of workers who commute into San Francisco from areas with higher VMT per capita.

2 UC Davis Professor Chris Elmendorf has written a letter to the city detailing these concerns in more detail, and I support his comments:

<https://url.avanan.click/v2/> https://drive.google.com/file/d/10pIS1Sd6T7FdKBkgd5DD1MbOsEnJgbE1/view_.YXAzOnNmZHqYOmE6bzo5ZDI3MjIwYjVhY2M1ZTM0NzgqOGE0MGE3YjlxODE1Yzo2OjNiYWU6NDAwNzgqZWRIODc3ZjMzMTU1YmYzMjU4MjQ3OWVjMGFjYmZlYmY5OTRhMmQzMmNmYjZlMTYyNTQyMWEzMGRkNzpoOIQ

3 The EIR should therefore not refer to the No Project Alternative as the environmentally superior alternative, as doing so fails to recognize the GHG emissions which would result from it. Instead, the DEIR should plan to accommodate over 10,000 new housing units per year to address the climate crisis.

Stacey Randecker
stacey@randecker.com
 481 Mississippi St
 San Francisco, California 94107

From: [Kristin Resnansky](#)
To: [Ruiz, Gabriella \(CPC\)](#); [Imperial, Theresa \(CPC\)](#); [Koppel, Joel \(CPC\)](#); [Fung, Frank \(CPC\)](#); [Diamond, Susan \(CPC\)](#); [Moore, Kathrin \(CPC\)](#); [Tanner, Rachael \(CPC\)](#); [Hillis, Rich \(CPC\)](#); [CPC.HousingElementUpdateEIR](#); [Donovan, Dominica \(BOS\)](#)
Subject: Change in height restrictions in Jordan Park
Date: Monday, June 20, 2022 9:40:07 AM

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

Hi,

1 I am a resident in Jordan Park. I recently learned of the proposed change in height restrictions
2 for Jordan Park. I am extremely concerned about the consequences of this change in height
3 limitation from 40 feet to 85 feet. This change hasn't been well communicated or vetted. As a
resident, I want to make sure my voice and my neighbors' voices are heard. We all support the
need for additional housing in our great city but that has to be balanced with the character of
our neighborhoods. I think such a dramatic change in height limitations on side streets would
irreparably damage the fabric of the neighborhood.

4 I am strongly against this proposal and I urge you to develop alternative scenarios for how
how planned growth and development can be equitably distributed throughout the city.

Thank you for your time.

Best,
Kristin

--

Kristin Resnansky
(646) 354-3327

From: [White, Elizabeth \(CPC\)](#)
To: [CPC.HousingElementUpdateEIR](#)
Subject: FW: Housing Element 2022 - Draft EIR
Date: Tuesday, July 5, 2022 7:15:20 AM

From: Sallie Robbins <sallierobbins@gmail.com>

Sent: Saturday, July 02, 2022 1:25 PM

To: Stefani, Catherine (BOS) <catherine.stefani@sfgov.org>; Donovan, Dominica (BOS) <dominica.donovan@sfgov.org>; Diamond, Susan (CPC) <sue.diamond@sfgov.org>; Fung, Frank (CPC) <frank.fung@sfgov.org>; Koppel, Joel (CPC) <joel.koppel@sfgov.org>; Imperial, Theresa (CPC) <theresa.imperial@sfgov.org>; Ruiz, Gabriella (CPC) <gabriella.ruiz@sfgov.org>; CPC-Commissions Secretary <commissions.secretary@sfgov.org>; Hillis, Rich (CPC) <rich.hillis@sfgov.org>; White, Elizabeth (CPC) <elizabeth.white@sfgov.org>; Moore, Kathrin (CPC) <kathrin.moore@sfgov.org>

Subject: Re: Housing Element 2022 - Draft EIR

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

On Sat, Jul 2, 2022 at 1:05 PM Sallie Robbins <sallierobbins@gmail.com> wrote:

To: Elected and Appointed SF Government Representatives

I have been the owner of 189 Collins St. 94118 for 34 years. The length of my property adjoins the back of a commercial building at 2900 Geary. The Draft EIR proposal threatens my children's entire inheritance. If and when a developer constructs an 85 foot high apartment complex at 2900 Geary, my 1915 Edwardian will collapse into the excavations! OR will the developer be required to pay me the 3 million dollars the property is worth?

DO YOU HAVE ANY IDEA HOW THIS PROPOSAL IMPACTS THE CONSTANT EFFORTS OF AN 80 YEAR OLD WIDOW TO MAINTAIN AND IMPROVE HER PROPERTY FOR HER CHILDREN? THIS PROPOSAL COULD LITERALLY WIPE ME OUT.

In addition to my GRAVE personal threats, I quote a diligent local resident who has informed the neighborhood of the absence of public notice:

" There has been no open and transparent process and no public hearings whatsoever. No notifications have ever been issued on this subject to the public at large.

3. Burying such a critical issue within the Planning Department's website is not an open and transparent method of notifying the public, it's quite the opposite-it's opaque and secretive. As the Washington Post states "Democracy Dies in Darkness."

4. No public hearings on what is clearly a once-in-a-generation change to the heights, size, bulk, density as well as the character of neighborhoods have taken place. This needs to be rectified.

5. Historical significance neighborhoods are being demolished under this plan. This needs to be analyzed in great detail."

The Housing Element Draft EIR is based on a Process that is flawed, opaque, secretive and absent any public outreach program whatsoever.

On behalf of all the homeowners and residents of the Geary St. Corridor, I appeal for more information and PROTECTION for residents such as myself who are more DIRECTLY impacted by the 85 foot height and density proposals.

Thank you.....Sallie Robbin

From: [Donovan, Dominica \(BOS\)](#)
To: sallierobbins@gmail.com
Cc: [CPC.HousingElementUpdateEIR](#)
Subject: FW: Housing Element 2022 D2 Meeting
Date: Thursday, July 7, 2022 9:58:04 AM

Including Planning for their records.

Dominica Donovan
Legislative Aide, District 2

From: Sallie Robbins <sallierobbins@gmail.com>
Sent: Thursday, July 07, 2022 9:49 AM
To: Donovan, Dominica (BOS) <dominica.donovan@sfgov.org>
Subject: Re: Housing Element 2022 D2 Meeting

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

CONCERNS ABOUT EIR DRAFT:

I am an older person with medical conditions whose property directly borders a commercial building at 2900 Geary. If an 85 ft. high building were constructed at this location, the structural stability of my 1915 Edwardian is at risk, the height would ruin my garden as it would be in constant shade, the property value would be at least halved and the stress of endless construction noise would greatly compromise my health. This home is my children's inheritance. Would there be exemptions for a person in my situation?

I have plans to install solar panels and believe that any building which blocks the sun could not be constructed. Please also address this issue.

On Tue, Jul 5, 2022 at 10:04 AM Donovan, Dominica (BOS) <dominica.donovan@sfgov.org> wrote:

Hi folks,

For all who are interested and able to attend, I've secured a meeting time this week with Planning Department staff to discuss questions and concerns relating to the [draft EIR of the Housing Element](#). The draft EIR is a very dense and complicated document to digest and this is a really great opportunity to engage directly with SF Planning.

And, if you're able, please send along any questions you might have ahead of time so that we can make the best use of time for the meeting. Also, please feel free to share with those who may be interested in attending.

Thanks so much and hope to see you on there!

-Dominica

Microsoft Teams meeting

Join on your computer or mobile app
[Click here to join the meeting](#)

Or join by entering a meeting ID

Meeting ID: 231 089 028 370

Passcode: Daabe2

Or call in (audio only)

[+1 415-906-4659, 939871775#](tel:+14159064659939871775) United States, San Francisco

Phone Conference ID: 939 871 775#

[Find a local number](#) | [Reset PIN](#)

[Learn More](#) | [Meeting options](#)

—

From: [Donovan, Dominica \(BOS\)](#)
To: [KELLY ROBERSON; Stefani, Catherine \(BOS\)](#)
Cc: [CPC.HousingElementUpdateEIR](#)
Subject: RE: Housing Element 2022 Draft EIR July 12 hearing - URGENT - POSTPONE
Date: Tuesday, July 5, 2022 12:08:57 PM

Hi Kelly,

By way of clarification, **there is not a hearing scheduled for July 12.**

The Planning Department is accepting comments on the Housing Element 2022 draft EIR through July 12.

If you have comments, please send them to cpc.housingelementupdateeir@sfgov.org (also copied). Additionally, we are hosting a conversation with Planning Department staff and interested members of the community this Thursday July 7 at 3pm. This meeting is virtual. This is a great opportunity to ask questions and gain clarity around the process. If you'd like to attend, please let me know and I will send you the link.

All the best,

Dominica Donovan
Legislative Aide, District 2

From: KELLY ROBERSON <kelly-roberson@sbcglobal.net>

Sent: Tuesday, July 05, 2022 12:05 PM

To: Stefani, Catherine (BOS) <catherine.stefani@sfgov.org>; Donovan, Dominica (BOS) <dominica.donovan@sfgov.org>

Subject: Housing Element 2022 Draft EIR July 12 hearing - URGENT - POSTPONE

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

Hello Ms. Stefani,

I hope that you are well. After reading about the July 12 hearing, I started to feel rather unwell due to the subversion of the public comment process for the SF Housing Element.

The Housing Element 2022 Draft EIR July 12 hearing must be postponed. The July 12th Hearing comes on the heels of a failed process by the Planning Department.

The proposed Housing Element's EIR process has not been an open or transparent and WITHOUT public hearings whatsoever. The public has received no notifications on this subject.

Planning Department's website buried this critical issue preventing an openness and transparency. In fact, it's quite the opposite-it's opaque and secretive. As the Washington Post states, "Democracy Dies in Darkness."

Clearly a once-in-a-generation change to the heights, size, bulk, density as well as the character of neighborhoods cannot take place without significant neighborhood group input and public involvement – because these areas and families will be the most greatly impacted.

The July 12th Hearing is based on a process that is flawed, opaque, secretive and absent any public outreach program whatsoever. This is unacceptable. The hearing needs to be to be postponed, and the process corrected.

Thanks,
Kelly Roberson

431 Walnut Street

I-Roberson

From: [White, Elizabeth \(CPC\)](#)
To: [CPC.HousingElementUpdateEIR](#)
Subject: FW: Housing Element's Draft EIR - Comments from a Resident
Date: Monday, July 11, 2022 7:56:39 AM

From: KELLY ROBERSON <kelly-roberson@sbcglobal.net>

Sent: Friday, July 08, 2022 6:25 PM

To: Rachel.Tanned@sfgov.org; Moore, Kathrin (CPC) <kathrin.moore@sfgov.org>; Diamond, Susan (CPC) <sue.diamond@sfgov.org>; Fung, Frank (CPC) <frank.fung@sfgov.org>; Koppel, Joel (CPC) <joel.koppel@sfgov.org>; Imperial, Theresa (CPC) <theresa.imperial@sfgov.org>; Ruiz, Gabriella (CPC) <gabriella.ruiz@sfgov.org>; CPC-Commissions Secretary <commissions.secretary@sfgov.org>; Hillis, Rich (CPC) <rich.hillis@sfgov.org>; White, Elizabeth (CPC) <elizabeth.white@sfgov.org>; frfbeagle@gmail.com

Subject: Housing Element's Draft EIR - Comments from a Resident

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

Hello All,

I hope that you are well. After reading about the proposed Housing Element's proposed changes, I started to feel rather unwell due to the subversion of the public comment process for the SF Housing Element.

The proposed Housing Element's EIR process has not been an open or transparent and without public hearings whatsoever. The public has received no notifications on this subject. Ok, maybe the Planning Department, or its subcontractors, has met with a handful of selected focus groups, but has the department meet with the large residential neighborhood groups whose members are potentially hugely impacted by any changes to the zoning regulations?

Planning Department's website buried this critical issue preventing an openness and transparency. In fact, it's quite the opposite-it's opaque and secretive, or worse selective. As the Washington Post states, "Democracy Dies in Darkness."

Clearly a once-in-a-generation change to the heights, size, bulk, density as well as the character of neighborhoods cannot take place without significant neighborhood group input and public involvement – because these areas and families will be the most greatly impacted.

Turning to current events, COVID has clearly, and perhaps permanently, reduced the need for people to work or be downtown at all. SF Schools have experienced declining enrollment by around 3,500 students. Compass Realty's June report said that housing values are decreasing due to interest rate fears. Investing in real estate now is risky. SF Muni has fewer riders now – only 54% of weekday pre-pandemic ridership. As a city, we are reducing for the foreseeable future. The contraction will not last forever – of course. What specific language in the Housing Element's development goals recognize scale for BOTH contracting or expanding local economy?

Getting hyper local, because I live near the 3333 California housing project, I'll ask

3
Cont'd

what regulations are required of the developers to ensure that the excavated soils, possibly contaminated with 100 year old mortuary chemicals, are not gently wafting across the street to the JCC's preschoolers and neighborhood areas? Because nothing is as fun as mixing toxins and toddlers. Just when we thought we could occasionally pull down the N95 mask...

4

Last but not least, how does the Housing Element document the necessary water allocations for any additional residences? Logic would suggest that the water resources would be known in advance before building more units. According a Report to Supervisor Preston dated Jan 31, 2022 prepared by the Budget and Legislative Analyst's Office, there are around 40,000 vacant units in 2019. Well, that's a refreshing relief in drought years. Fewer residents to draw on the limited water supply. The Housing Element's "Impact UT-1" on page 108/109 of 616 pages (or Page S-82), starts to touch on this point (maybe?), but the result is "No feasible mitigation available." Perhaps I'm not reading this correctly, but it does not give one confidence. Page S-99 may reference this as well. Many people, especially me, would appreciate a series of charts listing 1 - Our water reservoirs' volume variations (naturally this varies) over the last 30 years. 2 - San Francisco's and the Peninsula's per capita consumption over the last 30 years. 3 - Volume of water purchased for other regions/sources. 4 - Possible volume gains from treated/decontaminated water. This basic numeric data would explain what development levels might be sustainable and add to the Housing Element report's credibility and transparency. It does not matter how diverse, respectful, and fun loving a city could be - no water is still no water.

Thanks for your time. Be safe! Be Well!

Kelly Roberson

431 Walnut #2

From: [KELLY ROBERSON](#)
To: [CPC.HousingElementUpdateEIR](#); Rachel.Tanned@sfgov.org; [Moore, Kathrin \(CPC\)](#); [Diamond, Susan \(CPC\)](#); [Fung, Frank \(CPC\)](#); [Koppel, Joel \(CPC\)](#); [Imperial, Theresa \(CPC\)](#); [Ruiz, Gabriella \(CPC\)](#); [CPC-Commissions Secretary](#); [Hillis, Rich \(CPC\)](#); [White, Elizabeth \(CPC\)](#); frfbeagle@gmail.com
Subject: Housing Element's Draft EIR - a few more comments
Date: Monday, July 11, 2022 4:58:18 PM

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

Hello SF Planning Dept and Commission,

I hope that you all had a great weekend.

I spend a little time over the weekend reading more of the Housing Element EIR Draft and have additional comments.

1 ■ Shadowing and Daylight Access - As you know, increasing building heights creates significant shadowing and daylight access issue for adjacent buildings, homes, yards, etc. In fact taller buildings "privilege" the new buildings' occupants and "diminish" the older adjacent building's residents - by substantially reducing the daylight for older buildings which are east, north, and west of newer and taller buildings. Doesn't everyone deserve equal access to the sun and sky regardless of the building age? How is the Housing Element ensuring that no one is losing sky access? This needs to be one of the report's primary goals.

2 ■ Wind Effects - Clearly the SF wind is a force of nature as it gusts against tall building sides and shoots down to sidewalk level. How many of your umbrellas have been claimed as a sacrifice by Huracon (the Mayan god of Wind)? I jest, but you get the point. Taller buildings produce more wind velocity at street level. So before we start blowing over our seniors, many of whom reside in the windy western SF neighborhoods, let's set the overall intent as reducing ground-level wind speeds in order that the project shall not cause equivalent wind speeds to reach or exceed a 20 mph wind hazard criterion for a single hour of the year in areas of substantial use by people walking (e.g., sidewalks, plazas, building entries, etc.). As a result, wind tunnel test of proposed buildings, and their surrounding buildings, will be required of all new buildings above 45 ft. Through this, we can avoid a future SF Chronicle headline "53 Seniors Toppled by Wind Effects on Geary this Year - Any VisionZero Traffic Improvements Were Negated."

Again, thanks for your time and attention to these matters.

Best,

Kelly Roberson
431 Walnut

From: Sarah Rogers <info@email.actionnetwork.org>
Sent: Wednesday, June 8, 2022 8:00 PM
To: CPC-Commissions Secretary <commissions.secretary@sfgov.org>
Subject: Item 2019-016230ENV: plan for 10,000 homes per year by 2031

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

Planning Commission Staff Commission Affairs,

1 This Environmental Impact Report is an impact report for outdated housing targets. The report studies alternatives based on Mayor Lee's 2017 goal of building five thousand units per year by 2050, but former Mayor Lee's goal predates our RHNA and even predates the bill that outlined the parameters for calculating RHNA, that bill being Senator Wiener's SB 828. It is difficult to overstate how different these goals are: our RHNA requires ten thousand units per year by 2030, not five thousand units per year by 2050.

While expedient, it is wrong to not study a lawful alternative. Our city is walking blind into the actual environmental effects of accommodating our housing targets, and our city risks blowing all of our affordable housing funding.

Please add an alternative that studies rezoning for over seventy thousand additional units, as our RHNA requires. It is negligent not to.

2 I urge you to address the comments made by UC Davis Professor Chris Elmendorf in his analysis of the draft EIR:
<https://url.avanan.click/v2/> https://drive.google.com/file/d/10pIS1Sd6T7FdKBkgd5DD1MbOsEnJgbE1/view_.YXAzOnNmZHQyOmE6bzo5MjEyZmVIM2RmYzU5YzAxZDE3MjM4MDBkOTA5MTBIYjo2OmMzOWQ6NDhjZGY5Zic3MWNjMWY4ZTMxZmYxOGY3N2Y5MDQyZTIjZDdkMWMzNTcxNjZiYTNiYmZjZGY2NTc4ZjNhMTJmMjp0OIQ

Sarah Rogers
serogers@gmail.com
371 Elsie St
San Francisco, California 94110

From: Jeremy Rose <nornagon@nornagon.net>
Sent: Wednesday, June 8, 2022 11:07 AM
To: jonas.ionin@sfgov.org
Subject: Item 2019-016230ENV: plan for 10,000 homes per year by 2031

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

Planning Commission Secretary Jonas Ionin,

1 This Environmental Impact Report is an impact report for outdated housing targets. The report studies alternatives based on Mayor Lee's 2017 goal of building five thousand units per year by 2050, but former Mayor Lee's goal predates our RHNA and even predates the bill that outlined the parameters for calculating RHNA, that bill being Senator Wiener's SB 828. It is difficult to overstate how different these goals are: our RHNA requires ten thousand units per year by 2030, not five thousand units per year by 2050.

While expedient, it is wrong to not study a lawful alternative. Our city is walking blind into the actual environmental effects of accommodating our housing targets, and our city risks blowing all of our affordable housing funding.

Please add an alternative that studies rezoning for over seventy thousand additional units, as our RHNA requires. It is negligent not to.

2 I urge you to address the comments made by UC Davis Professor Chris Elmendorf in his analysis of the draft EIR:

<https://url.avanan.click/v2/> https://drive.google.com/file/d/10plS1Sd6T7FdKBkgd5DD1MbOsEnJgbE1/view_.YXAzOnNmZHQyOmE6bzowMTIIMzFmYTY2YTg5OWI3NGM5ODQyMjU3MzRhNWE2MT02OmI0ZTQ6NDg0Mjg1NjY2M2YwMTM3NDg0NWQzNjI2ZjI0MWYxYTU4MmEzNDFkZTE0YjNhMjYxYTc4ZGZlZWZmOGU0Mzg1ZDp0OIQ

Jeremy Rose
nornagon@nornagon.net
319 Precita Ave
San Francisco, California 94110

From: Kenneth Russell <info@email.actionnetwork.org>
Sent: Wednesday, June 8, 2022 11:27 AM
To: jonas.ionin@sfgov.org
Subject: Hearing item 11: take our housing goals seriously in the Draft EIR

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

Planning Commission Secretary Jonas Ionin,

This Environmental Impact Report does not fully accommodate San Francisco's RHNA requirements. The DEIR seeks to satisfy Mayor Ed Lee's 2017 goal of producing 5,000 homes per year through 2050. But San Francisco's 2023-2030 RHNA is 82,069 units, which is roughly 10,000 homes per year. The DEIR's sites inventory report attempts to make up for this gap by rezoning for 20,000 units "above baseline," but this figure makes the faulty assumption that all units in the pipeline will actually become housing. To the contrary, Professor David Broockman's comment letter indicates that, based on the historical rate at which pipeline units turn into actual housing, San Francisco would need to rezone for 70,000 units above-baseline in order for the necessary inventory to actually come into existence.

By not fully accommodating San Francisco's RHNA, the DEIR sets San Francisco up for an enormous headache. Undershooting on the EIR would put an upper limit on the number of units produced by the city's housing element. This bind, in turn, would give the California HCD ground to reject the city's pipeline/status-quo capacity analysis. In the best case scenario, SF Planning would need to redo the requisite environmental review for a compliant plan prior to the deadline on a very limited time frame. This would mean long nights and early mornings struggling to meet a difficult deadline, and it would be unlikely to put SF Planning staff in a position to do their best work. In the worst case scenario, the city would be unable to meet the deadline altogether, thus falling out of compliance, losing affordable housing funds, and being exposed to the builder's remedy.

This course of events is still avertable. If the Planning Department writes an EIR for the proper number of units, San Francisco would be put in a much stronger position to pass a compliant housing element and avoid the consequences of being found out of compliance.

I urge you to heed the DEIR comments written by Professor Chris Elmendorf:

https://url.avanan.click/v2/https://drive.google.com/file/d/10pIS1Sd6T7FdKBkgd5DD1MbOsEnJgbE1/view_.YXAzOnNmZHQyOmE6bzpkZjYzMGFiNmE5YmQyODc2Mzk5MDNiNGZkY2JlZTA3Nzo2OjcyNmY6NmI1MDA4MDY0NWRmZGE0YzY2ZTE4YzQ1OWY2ZWYxNWNiOWE0YWY5NjJhZDgxN2NkZGYzOWQ1YzViM2NiYTgzZjp0OIQ

Kenneth Russell
krlist+yimby@gmail.com
8400 Oceanview Ter Apt 414
San Francisco, California 94132

From: [Christopher Schember](#)
To: [CPC.HousingElementUpdateEIR](#)
Subject: Jordan Park height restriction
Date: Wednesday, June 22, 2022 3:09:17 PM

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

Madams & Sirs,

Please note my vigorous opposition to the proposal to alter the current building height restriction from 40 feet to 85 feet for Jordan Park, my neighborhood for 20+ years.

Respectfully,

Christopher Schember

22 Commonwealth Avenue

From: [SchuT](#)
To: [White, Elizabeth \(CPC\)](#)
Cc: [Haddadan, Kimia \(CPC\)](#)
Subject: DEIR 2022 Housing Element
Date: Monday, July 11, 2022 12:47:47 PM
Attachments: [IMG_9617.PNG](#)

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

Dear Liz,
Hope you are doing well. Here is an additional comment for the DEIR for the Housing Element. Perhaps it is also (or more) appropriate for the EIR itself, but I think it is helpful for historical context and/or future context. Thank you and take care.

Georgia

Comment:

Below is a photo taken in 1961 that was recently published (July 2022) in the online version on the San Francisco Chronicle. This aerial view shows blocks in the Fillmore.

Please include this in the DEIR to illustrate an impact of a massive rezoning, which Redevelopment was fundamentally.

Since this photo was fairly early in the Redevelopment process, I assume that many other blocks were obliterated later on. (Even as late as 1979 blocks adjacent to Fillmore Street north of Geary Blvd were still empty lots).

Please include this photo in the DEIR (and maybe the Draft Element) along with a further discussion of the long term impact of this Redevelopment on housing and housing supply in San Francisco and how this Redevelopment compares with proposals to re-zone (upzone) San Francisco per the Draft Housing Element to meet the RHNA goals.

Georgia Schuttish



From: SchuT <schuttishtr@sbcglobal.net>
Sent: Wednesday, July 13, 2022 3:20 AM
To: White, Elizabeth (CPC) <elizabeth.white@sfgov.org>
Cc: Haddadan, Kimia (CPC) <kimia.haddadan@sfgov.org>; Caltagirone, Shelley (CPC) <shelley.caltagirone@sfgov.org>; Small, Maia (CPC) <maia.small@sfgov.org>
Subject: DEIR 2022 Housing Element CORRECTION

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

*Good morning, Liz,
I just wanted to make a correction even though the deadline has now passed.
I should have said "**south of Geary Blvd**" not "north" in my original email comments prior to July 12th. I corrected it below.
Thanks much. (I just thought of it in the middle of the night!).
Georgia*

Dear Liz,
Hope you are doing well. Here is an additional comment for the DEIR for the Housing Element. Perhaps it is also (or more) appropriate for the EIR itself, but I think it is helpful for historical context and/or future context.
Thank you and take care.
Georgia

Comment:

*Below is a photo taken in 1961 that was recently published (July 2022) in the online version on the San Francisco Chronicle. This aerial view shows blocks in the Fillmore.
Please include this in the DEIR to illustrate an impact of a massive rezoning, which Redevelopment was fundamentally. Since this photo was fairly early in the Redevelopment process, I assume that many other blocks were obliterated later on. **(Even as late as 1979 blocks adjacent to Fillmore Street south of Geary Blvd were still empty lots).**
Please include this photo in the DEIR (and maybe the Draft Element) along with a further discussion of the long term impact of this Redevelopment on housing and housing supply in San Francisco and how this Redevelopment compares with proposals to re-zone (upzone) San Francisco per the Draft Housing Element to meet the RHNA goals.*



From: Elliot Schwartz <info@email.actionnetwork.org>
Sent: Wednesday, June 8, 2022 11:34 AM
To: jonas.ionin@sfgov.org
Subject: Item 2019-016230ENV: plan for 10,000 homes per year by 2031

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

Planning Commission Secretary Jonas Ionin,

1 This Environmental Impact Report is an impact report for outdated housing targets. The report studies alternatives based on Mayor Lee's 2017 goal of building five thousand units per year by 2050, but former Mayor Lee's goal predates our RHNA and even predates the bill that outlined the parameters for calculating RHNA, that bill being Senator Wiener's SB 828. It is difficult to overstate how different these goals are: our RHNA requires ten thousand units per year by 2030, not five thousand units per year by 2050.

While expedient, it is wrong to not study a lawful alternative. Our city is walking blind into the actual environmental effects of accommodating our housing targets, and our city risks blowing all of our affordable housing funding.

Please add an alternative that studies rezoning for over seventy thousand additional units, as our RHNA requires. It is negligent not to.

2 I urge you to address the comments made by UC Davis Professor Chris Elmendorf in his analysis of the draft EIR:

<https://url.avanan.click/v2/> https://drive.google.com/file/d/10plS1Sd6T7FdKBkgd5DD1MbOsEnJgbE1/view_.YXAzOnNmZHQyOmE6bzplZGRiZjRmOTRjZDMzNjQ0YzlyMmlzYzQ5ODE1NDg1MT02OmEwNTQ6NDFlNDMwOWUxNTk5NTQwYjMzYTUwZjhINGExMmM0NzdlYzU0NDNjMTYxY2U2MzdkNTU4MGQ2MmFmNTE1ZGQyYz00IQ

Elliot Schwartz
elliott.schwartz@gmail.com
930 Rhode Island St
San Francisco, California 94107

From: Scott Simmons <info@email.actionnetwork.org>
Sent: Wednesday, June 8, 2022 9:59 AM
To: jonas.ionin@sfgov.org
Subject: Item 2019-016230ENV: plan for 10,000 homes per year by 2031

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

Planning Commission Secretary Jonas Ionin,

1 This Environmental Impact Report is an impact report for outdated housing targets. The report studies alternatives based on Mayor Lee's 2017 goal of building five thousand units per year by 2050, but former Mayor Lee's goal predates our RHNA and even predates the bill that outlined the parameters for calculating RHNA, that bill being Senator Wiener's SB 828. It is difficult to overstate how different these goals are: our RHNA requires ten thousand units per year by 2030, not five thousand units per year by 2050.

While expedient, it is wrong to not study a lawful alternative. Our city is walking blind into the actual environmental effects of accommodating our housing targets, and our city risks blowing all of our affordable housing funding.

Please add an alternative that studies rezoning for over seventy thousand additional units, as our RHNA requires. It is negligent not to.

2 I urge you to address the comments made by UC Davis Professor Chris Elmendorf in his analysis of the draft EIR:
https://url.avanan.click/v2/_https://drive.google.com/file/d/10pIS1Sd6T7FdKBkgd5DD1MbOsEnJgbE1/view_.YXAzOnNmZHQyOmE6bzoyMDQ2NTk1NTA1MzAzZGJmMzkwM2MyMTA2NWVvKOWY4MT02OmlwNGI6MGZINTdiZDlmM2E5ZjliNzcxNmZjYzY4ZmE4MjVmZGU4ZmQ4NmM3MGNmMDRIYjkzMWQ5MTJiYjEzYWU4YzRiNTp0OIQ

Scott Simmons
ss186262@gmail.com
1390 Market Street, Apt 2523
SF, California 94102

From: [Meg Storey](#)
To: [CPC.HousingElementUpdateEIR](#)
Subject: Jordan Park draft plan for change - current resident concern
Date: Friday, June 17, 2022 6:26:54 PM

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

Dear Commissioners, Aides and Officials:

1 I just learned that there is an important plan to change and lessen significantly the height restrictions for buildings in the area around parts of Jordan Park and other neighborhoods, I request a delay of the current June 20 deadline for comment. I have had no warning of this proposed change, and I have not had any chance to review it. I am sure most other residents are in a similar situation. I believe the document is the proposed height limit / zoning changes in the draft EIR Impact Report, Volume 1.

Please extend the deadline for input. This proposal would have a huge, detrimental impact on one of the vital neighborhoods in our city. Certainly, we need to share the load of expanding density, but I need time to understand whether or not this plan, as it is written is too aggressive in that effort.

Thank you for your consideration.

Meg Storey
187 Jordan Avenue, SF, CA 94118

From: Zack Subin <zack.subin@fastmail.fm>
Sent: Wednesday, June 8, 2022 7:55 PM
To: CPC-Commissions Secretary <commissions.secretary@sfgov.org>
Subject: Hearing item 11: take our housing goals seriously in the Draft EIR

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

Planning Commission Staff Commission Affairs,

As a resident of SF D11 and a climate policy practitioner, I am writing to say that more housing in SF is better for the climate. We should write an EIR for our housing element that reflects that.

This Environmental Impact Report does not fully accommodate San Francisco's RHNA requirements. The DEIR seeks to satisfy Mayor Ed Lee's 2017 goal of producing 5,000 homes per year through 2050. But San Francisco's 2023-2030 RHNA is 82,069 units, which is roughly 10,000 homes per year. The DEIR's sites inventory report attempts to make up for this gap by rezoning for 20,000 units "above baseline," but this figure makes the faulty assumption that all units in the pipeline will actually become housing. To the contrary, Professor David Broockman's comment letter indicates that, based on the historical rate at which pipeline units turn into actual housing, San Francisco would need to rezone for 70,000 units above-baseline in order for the necessary inventory to actually come into existence.

By not fully accommodating San Francisco's RHNA, the DEIR sets San Francisco up for an enormous headache. Undershooting on the EIR would put an upper limit on the number of units produced by the city's housing element. This bind, in turn, would give the California Department of Housing and Community Development grounds to reject the city's pipeline/status-quo capacity analysis. In the best case scenario, SF Planning would need to redo the requisite environmental review for a compliant plan prior to the deadline on a very limited time frame. This would mean long nights and early mornings for city staffers struggling to meet a difficult deadline, and it would be unlikely to put SF Planning staff in a position to do their best work. In the worst case scenario, the city would be unable to meet the deadline altogether, thus falling out of compliance—losing eligibility for affordable housing funds, and possibly even losing land use authority.

This course of events is still avertable. If the Planning Department writes an EIR for the proper number of units, San Francisco would be put in a much stronger position to pass a compliant housing element and avoid the consequences of being found out of compliance.

I urge you to heed the DEIR comments written by Professor Chris Elmendorf:

https://url.avanan.click/v2/_https://drive.google.com/file/d/10plS1Sd6T7FdKBkgd5DD1MbOsEnJgbE1/view_.YXAzOnNmZHQyOmE6bzo5YTU2NWUzZGVlOWU1NTMzOWFmZWQ2OGI2NGNhZDEzMzo2OjJiYjQ6OWEyMjJiN2JiMDVhYWFnN2NmODUxODI0MTU3NmYyY2NmMTRjMzgqNzAwNzM0NzQ2MDRjNjJmYjIwYzc1MzAyZDp0OIQ

Zack Subin
zack.subin@fastmail.fm
 192 Caine Avenue
 San Francisco, California 94112

From: Richard Thalheimer <richard.thalheimer@gmail.com>
Sent: Thursday, August 11, 2022 11:09 AM
To: Stefani, Catherine (BOS); Donovan, Dominica (BOS); ChanStaff (BOS); Hillis, Rich (CPC); White, Elizabeth (CPC); Caltagirone, Shelley (CPC); Leon-Farrera, Malena (CPC)
Subject: From Richard Thalheimer to this group:

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

Hello All,
Forgive the group email. This is to make it known that I support this position as stated below:
Sincerely,
Richard Thalheimer
3330 California St # 1
San Francisco

July 12, 2022

By Electronic Mail to CPC.HousingElementUpdateEIR@sfgov.org

San Francisco Planning Department

Re: San Francisco Housing Element 2022 Update Draft EIR

Case No.: 2019-016230ENV

The Draft EIR fails to analyze a reasonable range of alternatives to the proposed project and fails to adequately analyze the insufficiency of water supply for City residents and businesses that could foreseeably result from implementation of the policy changes set forth in the proposed project.

The proposed project would adopt policies that would foreseeably be implemented through later zoning changes because the City is obliged to implement its general plan housing element. The Draft EIR (DEIR) explains that the DEIR has been prepared to evaluate the impacts on the environment that could result from adoption and implementation of the housing element update. (DEIR S-1) The Housing Element update is mandated by state law, Government Code section 65583. (Ibid.)

The housing element update establishes goals, policies, and actions to address the existing and projected housing needs of San Francisco. (Ibid.) The goals, policies, and actions are required to plan for the regional housing targets allocated to San Francisco by regional agencies for 2023 to 2031 and to meet future housing demand in San Francisco. (Ibid.) The housing element update includes overarching goals for the future of housing in San Francisco that respond both to state law requirements as well as local community values as understood from community outreach allegedly conducted for the housing element update. (DEIR S-1-S-2) The underlying policies and actions would guide development patterns and the allocation of resources to San

Francisco neighborhoods. (DEIR S-2) In general, the housing element update would shift an increased share of the City and County of San Francisco's future housing growth to transit corridors and low-density residential districts within well-resourced areas (see Figure 2-1, p. 2-2, in Chapter 2, Project Description. (DEIR S-2)

The City has failed to conduct a comprehensive planning process as to the areas to which growth would foreseeably be directed under the proposed project. Section 4.105 of the San Francisco Charter provides that in developing their recommendations as to goals, policies and programs for the future physical development of the City and County that take into consideration social, economic and environmental factors, the Planning Commission "shall consult with commissions and elected officials, and shall hold public hearings as part of a comprehensive planning process."

The DEIR states that the housing element update would shift an increased share of San Francisco's projected future housing growth to transit corridors and low density districts within well-resourced areas, citing Figure 2-1. (DEIR 2-1) The DEIR explains that adoption of the housing element would lead to future actions, such as planning code amendments to increase height limits along transit corridors and to modify density controls in low-density areas that are primarily located on the west and north sides of the city. (DEIR 2-1)

In a recent meeting conducted after the DEIR and Figure 2-1 were prepared, the Planning Department staff admitted that the only outreach that the Department conducted in District 2 was to the Cow Hollow and Golden Gate Valley neighborhood associations. The Planning Department failed to conduct the required outreach to the Jordan Park and Laurel Heights neighborhoods that Figure 2-7 shows are projected to have height limits increased to 55 feet in the residential areas, 85 feet in adjacent retail shopping areas and 85 feet in the 3333 California Street property. As the DEIR states at page 2-24: "Figure 2-7 shows the projected heights and density controls for future development consistent with the housing element update." Yet, at the recent remote meeting, Planning Department staff mischaracterized Figure 2-7 as merely one option that could be adopted, rather than as the proposed project. Although everyone appeared to understand that there would be a 2-step process to enact the zoning changes — first adopting the policy changes in the housing element update and second - enacting zoning ordinances establishing increased height limits, the Planning Department repeatedly stated that enacting the housing element — the first step would not enact the second step. However, the second step is foreseeable because the City must implement its general plan housing element.

The DEIR admits that the proposed action "would result in reasonably foreseeable indirect changes. Specifically, the department assumes that adoption of the housing element update would lead to future actions, such as planning code amendments to increase height limits along transit corridors and to modify density controls in low density areas that are primarily located on the west and north sides of the city, designation of housing sustainability districts, and approval of development projects consistent with the goals, policies, and actions of the housing element update." (DEIR S-2)

The EIR states that when the EIR uses the phrase "impacts of the proposed action," it refers to the reasonably foreseeable impacts that would result from those future implementation actions and development compared with the development anticipated under the existing 2014 housing element through 2050. Under the proposed action, the department projects approximately 150,000 housing units would be constructed in the City and County of San Francisco (city) by 2050, compared to 2020 conditions. The department projects approximately

housing units would be constructed by 2050 under the existing 2014 housing element (2050 environmental baseline). In other words, the department predicts that approximately 50,000 more housing units would be constructed by 2050 if the housing element update is adopted compared with the development anticipated under the existing 2014 housing element." (DEIR S-2)

The EIR also fails to recognize that under San Francisco's Charter, the City's zoning must be consistent with its general plan. Section 4.105 of San Francisco's Charter provides that: "The Planning Department, in consultation with other departments and the City Administrator, shall periodically prepare special area,

neighborhood and other plans designed to carry out the General Plan, and periodically prepare implementation programs and schedules which link the General Plan to the allocation of local, state and federal resources."

To date, much new development has occurred in the South of Market and eastern neighborhoods near the Downtown because developer profit has been larger in those areas than in the western areas. This is where developers have chosen to build. As a developer explained to me, it costs the same amount of money to build a unit of housing in the South of Market as it does to construct a unit of housing on Geary Boulevard, but the South of Market unit would sell or rent for more money. Yet, the DEIR fails to acknowledge this reality and is founded on the false premise that the construction that has occurred in the South of Market and eastern areas resulted from unfairness. Also, since the Planning Department approved all the development in the South of Market and eastern areas, it would appear from the City's premise that Department approvals must have been unfair.

1. The EIR Fails to Analyze the Reasonable Alternative of Encouraging Development and Increases in Height Limits Within One Quarter Mile of Transit Corridors.

In 2003, the San Francisco Planning Department released the attached map of residential lots within 1,250 feet of transit and commercial lots ("quarter-mile map"). Policy 11.6 of the 2004 San Francisco Housing Element encouraged "maximizing the opportunity for housing near transit." (See attached excerpts) In the 2014 San Francisco Housing Element, Policy 1.10 supported "new housing projects... where households can easily rely on public transportation" and Policy 13.3 promoted housing "within an easy walk of transit and services." (See attached excerpts)

Please analyze an alternative to the proposed action that would encourage residential development and increases in height limits within one quarter mile of the transit corridors and commercial lots depicted on the attached 2003 map. Such an alternative would be more equitable than the proposed project, which would encourage development within approximately one to two blocks of transit corridors and would cause those residential areas to bear a disproportionate share of the adverse impacts of the future growth. In contrast, a quarter-mile alternative would spread out the adverse impacts of the future growth, including the adverse impacts from noise, air contaminants, shadows and other adverse impacts, more equitably without disproportionately impacting the residential areas within about two blocks of the transit corridors.

The fact that the DEIR fails to include an alternative that would conform with the quarter-mile areas adjacent to transit corridors that were identified as areas to which growth would be directed in prior versions of the housing element is evidence that the range of alternatives analyzed in the DEIR is not reasonable. Further evidence that the range of alternatives analyzed in the DEIR is not reasonable is that the proposed housing element amendment would not encourage increased height limits in the wealthy neighborhoods, but would encourage increased height limits in middle and lower income neighborhoods.

Is it not true that under such a quarter-mile alternative, the adverse impacts of noise, shadows, and air contaminants would be smaller in the affected areas than under the more limited areas that would be affected by the proposed project? Please explain the foreseeable degree of difference in these impacts in the respective affected areas.

2. The DEIR Fails to Adequately Analyze the Proposed Project's Significant Adverse Impact on Insufficiency of Water Supply Needed to Serve Foreseeable Development.

The DEIR admits that if the Bay Delta Plan is implemented, "the SFPUC would require rationing and could develop new or expanded water supply facilities to address shortfalls in single and multiple dry years.

Environmental impacts related to new or expanded water supply facilities and increased rationing would result in significant and unavoidable environmental impacts. (Significant and Unavoidable)." (DEIR 4.9-14)

The DEIR admits that if "the Bay-Delta Plan Amendment is implemented, the SFPUC would be able to meet the projected demand in normal years but would experience supply shortages in single dry years and multiple dry years. Implementation of the Bay-Delta Plan Amendment would result in substantial dry-year and multiple dry-year water supply shortfalls and rationing throughout the SFPUC's regional water system service area, including San Francisco." (DEIR 4.9-2) Although the DEIR acknowledges that the "State Water Board has indicated that it intends to implement the Bay-Delta Plan Amendment on the Tuolumne River by 2022, assuming all required approvals are obtained by that time," the DEIR claims that 'implementation of the Bay-Delta Plan Amendment is uncertain because of pending legal challenges and outstanding regulatory actions." (DEIR 4.9-3) Substantial evidence does not support this claim.

The text of the water supply discussion in the DEIR fails to discuss the foreseeability that any of the City's legal challenges or the outstanding regulatory actions will be successful and fails to acknowledge that the City has sued the State because the State has drastically reduced the amount of water the City can pull from the Tuolumne River to "more than the city has to spare." (See attached Courthouse News Service, San Francisco Sues State to Retain Access to Vital

Water Supply, May 14, 2021, stating that City Attorney Dennis Herrera stated in an email that "the state's most recent effort — done behind closed doors — ignores the science and could leave us with virtually no water during a drought;" San Francisco, irrigation districts sue California over drought-related water restrictions, September 10, 2021 , stating that drought conditions are growing worse as the climate changes and quoting a senior attorney at the Natural Resources Defense Council as having stated that, "contrary to the suit's claims, San Francisco and other pre- 1914 water rights holders are in fact subject to the state board's authority.")

The DEIR misleads the decision makers and the public because it relies on the unsubstantiated claim that there is "a substantial degree of uncertainty associated with implementation of the Bay-Delta Amendment and its ultimate outcome" and because it fails to analyze the potential impacts of further decreased supplies as a result of global warming. (DEIR 4-9-20)

The DEIR is inadequate because it fails to disclose the severity of the San Francisco water supply shortages that would foreseeably result from implementation of the Bay-Delta Plan Amendment. The DEIR also fails to analyze the likelihood that the City's lawsuit or other regulatory actions will be successful in any degree.

The DEIR admits that under "the Bay-Delta Plan Amendment, existing and planned dryyear supplies would be insufficient with respect to the SFPUC satisfying its regional water system supply level-of-service goal of no more than 20 percent rationing system-wide. (DEIR 4.9-19) The DEIR states: "As shown in Table 4.9-2, shortfalls under dry-year and multiple dryyear scenarios would range from 11.2 mgd (15.9 percent) in a single dry year to 19.2 mgd (27.2 percent) in years two through five of a multiple dry-year drought, based on 2025 demand levels, and from 29.5 mgd (33.7 percent) in a single dry year to 35 mgd (40 percent) in years four and five of a multiple dry-year drought, based on 2050 demand (see Table 4.9-2)." (DEIR 4.9-19).

This analysis is inadequate because it fails to analyze the potentially significant impacts of increased water supply insufficiencies as a result of global warming. Please analyze the foreseeable impacts of global warming in increasing the water supply deficiencies in San Francisco based on the 2025 water supply demand levels and 2050 demand described above.

The DEIR admits that:

"rationing at the level that might occur under the Bay-Delta Plan Amendment would require restrictions on irrigation and other outdoor water uses (e.g., car washing), changes in water use behaviors (e.g., shorter

and/or less-frequent showers), and changes in how businesses operate, all of which could lead to undesirable socioeconomic effects... .high levels of rationing could lead to adverse physical environmental effects, such as a loss of vegetation resulting from prolonged restrictions on irrigation. Prolonged rationing within the city could make San Francisco a less desirable location for residential and commercial development compared with other areas of the state without substantial levels of rationing, which, depending on location, could increase urban sprawl. Sprawl development is associated with numerous environmental impacts, including for example increased greenhouse gas emissions and air pollution from longer commutes and lower density development, higher energy use, a loss of farmland, and increased water use from less water-efficient suburban development." (DEIR 4.9-25)

Please analyze the potential impacts on increased greenhouse emissions that could result from the high levels of rationing discussed above and the potential impact on reduced demand for new housing in San Francisco that could result from high levels of rationing.

The DEIR is also inadequate because it claims that the "SFPUC is in the process of exploring additional water supply opportunities through the Alternative Water Supply Planning Program. Table 4.9-3 identifies the new and expanded water supply facilities that are under consideration. Most of these projects are in the early 'feasibility' or 'conceptual' planning stages and would take several years to decades to implement." (DEIR 4.9-20) The DEIR is inadequate for relying on potential new or expanded water supply facilities without providing data showing the financial feasibility and likely funding sources for the potential new water supply projects. The tactic of relying on an unsubstantiated list of speculative expanded water supply projects has been struck down by courts.

The DEIR fails as an informative document because it fails to truthfully inform the decision makers and public of the severity of the water supply problem and the lack of a foreseeable solution to the water deficiencies that would foreseeably result from implementation of the housing element update.

3. The EIR Fails to Analyze a Reasonable Range of Alternatives Because it Fails to Analyze an Alternative Consisting of a Degree of Growth that Can Foreseeably be Supported with Adequate Water Supplies Without More than 20% Rationing.

As shown above, there is no substantial evidence that there will be enough water to supply the amount of new housing which the 2022 housing element update seeks to achieve. Please analyze an alternative that would construct an amount of new housing in San Francisco that could likely be served by foreseeable water supplies without more than 20% rationing.

CONCLUSION

For the reasons set forth above and to be supplemented, the Laurel Heights Improvement Association of San Francisco, Inc. objects to approval of the proposed project and certification of the EIR.

Very truly yours,

Laurel Heights Improvement Association of San Francisco, Inc.

By: Kathy Devincenzi, President

Laurelheights2016@gmail.com

From: [Alan Titus](#)
To: [CPC.HousingElementUpdateEIR](#); [CPC.HousingElementUpdateEIR](#); [Tanner, Rachael \(CPC\)](#); [Moore, Kathrin \(CPC\)](#); [Diamond, Susan \(CPC\)](#); [Fung, Frank \(CPC\)](#); [Koppel, Joel \(CPC\)](#); [Imperial, Theresa \(CPC\)](#); [Ruiz, Gabriella \(CPC\)](#); [Donovan, Dominica \(BOS\)](#); [Stefani, Catherine \(BOS\)](#)
Subject: Opposition to proposed height limit increases in Jordan Park
Date: Monday, July 11, 2022 10:45:01 PM

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

Dear Director of Planning Hillis and Planning Commission Members:

I am writing to express my objection to the proposed revision to the building height limitation upward to 85 feet from the existing limit of 40 feet for Jordan Park as represented by Fig. 2-7 on page 2-25 of the Draft Environmental Impact Report ("EIR") Volume I for the San Francisco Housing Element 2022 Update" of the General Plan.

• One of the guiding principles behind the housing element is that the development of new housing should be balanced fairly given that the west side has not absorbed much of the high density new residential development in the past. Based upon Fig. 2-7, it appears that the area delineated by Clement, Euclid and Pine Streets to the north; Park Presidio to the west; Anza to the South; and Fillmore to the east (the Delineated Area") is being targeted to assume a disproportionate percentage of the 50,000 dwelling units ("D.U.s") that the city is seeking to add by 2050. However, while several other neighborhoods including the Sunset, Noe Valley, Pacific Heights, Presidio Heights, Sea Cliff and the Marina would see more density, they would not be subjected to similar height increases under the proposed plan. Therefore, this plan clearly fails to meet its stated objective and standards of "fairness."

• Certain zones within the Delineated Area are targeted for even more dramatic building height limits of 200 feet (the former Lucky Penny site, for example) and Geary, as a commercial street and major east/west thoroughfare, is targeted for increased building height limits, which is understandable. However, allowing the height limitation increases to bleed into the neighboring many residential side streets, like Jordan, Commonwealth, Palm and Parker, is not. The Jordan Park Historic District is eligible for the California Register of Historical Resources under "Criterion C (architecture)." The proposed height increase would destroy the existing fabric, scale and character of the neighborhood that qualifies it for consideration as a "Historical Resource."

• From more technical viewpoint, as it currently exists, the West Side does not have the infrastructure (e.g. roads, parking, facilities, wastewater capacity, etc.) to bear the burden of the proposed development. For example, while the city plans to add 66 new recreational facilities by 2050, and our neighborhoods are currently well served in this regard, only six of the 66 planned new facilities are to be located in the West Side of the City. Thus, the West Side will be underserved in the future should this plan be realized.

• The proposed changes would irreparably divide neighborhoods in direct contradiction to one of the stated objectives of the Housing Element. In the section "Impacts and Mitigation Measures" (4.1-19 of the EIR Vol. I). Impact LU-1 dictates that "the proposed actions would not

4
Cont'd

physically divide an established neighborhood." Specifically, this section states that "the proposed action would not directly or indirectly create any new physical barriers within the city that would divide established neighborhoods." Permitting buildings to be constructed to a height more than twice the height of the existing homes would directly and indirectly divide Jordan Park! This change would destroy the character of the neighborhood, eliminate vistas into and out of the neighborhood and materially reduce the natural sunlight in the neighborhood! All these impacts are contrary to the stated objectives of the EIR.

5

The Planning Commission must consider/develop other alternatives and scenarios for how the planned growth and development can be more evenly and equitably distributed throughout the city. Regardless of where they seek to increase the housing stock in the city, no residential side streets should have height limitations as great as 85 feet. This will irreparably damage the urban fabric of our city and the character of our neighborhoods.

Sincerely,

Alan Titus
40 Parker Avenue

From: [White, Elizabeth \(CPC\)](#)
To: [CPC.HousingElementUpdateEIR](#)
Subject: FW: We need equitable planning in the draft housing element (Item 10)
Date: Tuesday, June 28, 2022 4:23:07 PM

From: CPC-Commissions Secretary <commissions.secretary@sfgov.org>

Sent: Tuesday, June 28, 2022 2:21 PM

Cc: Callagy, Alana (CPC) <alana.callagy@sfgov.org>; White, Elizabeth (CPC) <elizabeth.white@sfgov.org>; Feliciano, Josephine (CPC) <josephine.feliciano@sfgov.org>

Subject: FW: We need equitable planning in the draft housing element (Item 10)

Commission Affairs

San Francisco Planning

49 South Van Ness Avenue, Suite 1400, San Francisco, CA 94103

Direct: 628.652.7600 | www.sfplanning.org

[San Francisco Property Information Map](#)

From: Justin Truong <info@email.actionnetwork.org>

Sent: Tuesday, June 28, 2022 12:04 PM

To: CPC-Commissions Secretary <commissions.secretary@sfgov.org>

Subject: We need equitable planning in the draft housing element (Item 10)

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

Planning Commission Staff Commission Affairs,

SF Planning has set goals for the draft housing element which reflect San Francisco's values of diversity and equity. By building more housing in high opportunity neighborhoods on the west side, we can give kids from working class families a leg up on life. As research from Professor Chetty's team at Harvard has shown, kids from working class families enjoy higher upward economic mobility when they grow up in high opportunity areas.


However, SF has a long way to go on this front. According to the city's site inventory report, "since 2005 only 10% of all housing produced in San Francisco, including affordable housing, has been in [well-resourced] areas" (p. 18). To correct this historic injustice, we need to do far more.

This point cannot be overstated: the city's plan is to permit new housing on the west side that the city's own constraints analysis claims is not feasible to build. And the city only commits to making apartment buildings feasible to build by 2038. This is a plan to maintain the status quo.

To actually build more housing across the income spectrum on the west side, we need to lift the ban on high rises on the west side since, according to the city's own analysis, only high rises pencil out.

Furthermore, we need to remove veto points that can be used to block housing. The housing element's analysis of fair housing points out that neighborhood opposition contributes to our scarcity of fair housing. Just look at the proposed affordable housing

2
Cont'd



I-Truong

project at 2550 Irving, where neighbors sued to stop the first proposed affordable housing project in the Sunset District. Exclusionary neighborhoods will use any tools available to avoid change. To comply with our legal and ethical duty to affirmatively further fair housing, the city needs to remove veto points (like discretionary review and conditional use authorization) that are used by NIMBYs to stop housing.

Justin Truong
justintruong56@gmail.com
33 Junior Terrace
San Francisco, California 94112

From: Jonathan Tyburski <info@email.actionnetwork.org>
Sent: Wednesday, June 8, 2022 8:26 PM
To: CPC-Commissions Secretary <commissions.secretary@sfgov.org>
Subject: Hearing item 11: take our housing goals seriously in the Draft EIR

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

Planning Commission Staff Commission Affairs,

This Environmental Impact Report does not fully accommodate San Francisco's RHNA requirements. The DEIR seeks to satisfy Mayor Ed Lee's 2017 goal of producing 5,000 homes per year through 2050. But San Francisco's 2023-2030 RHNA is 82,069 units, which is roughly 10,000 homes per year. The DEIR's sites inventory report attempts to make up for this gap by rezoning for 20,000 units "above baseline," but this figure makes the faulty assumption that all units in the pipeline will actually become housing. To the contrary, Professor David Broockman's comment letter indicates that, based on the historical rate at which pipeline units turn into actual housing, San Francisco would need to rezone for 70,000 units above-baseline in order for the necessary inventory to actually come into existence.

By not fully accommodating San Francisco's RHNA, the DEIR sets San Francisco up for an enormous headache. Undershooting on the EIR would put an upper limit on the number of units produced by the city's housing element. This bind, in turn, would give the California Department of Housing and Community Development grounds to reject the city's pipeline/status-quo capacity analysis. In the best case scenario, SF Planning would need to redo the requisite environmental review for a compliant plan prior to the deadline on a very limited time frame. This would mean long nights and early mornings for city staffers struggling to meet a difficult deadline, and it would be unlikely to put SF Planning staff in a position to do their best work. In the worst case scenario, the city would be unable to meet the deadline altogether, thus falling out of compliance—losing eligibility for affordable housing funds, and possibly even losing land use authority.

This course of events is still avertable. If the Planning Department writes an EIR for the proper number of units, San Francisco would be put in a much stronger position to pass a compliant housing element and avoid the consequences of being found out of compliance.

I urge you to heed the DEIR comments written by Professor Chris Elmendorf:

<https://url.avanan.click/v2/> https://drive.google.com/file/d/10pIS1Sd6T7FdKBkgd5DD1MbOsEnJgbE1/view_.YXAzOnNmZHQyOmE6bzo2Zjl1MTY3Zjc2NWZhZGNkY2RmMzUzY2QyZTRhMmJmZDo2OjMzMTg6NTMyOTdiZDk0NmEyYjcxMzMwMzJhOTQ1MzE5ZDZmOWUxMDNjZjhmYjU5YTJmNThiODViMmExMTA3M2ZiYjZjOTp0OIQ

Jonathan Tyburski
jtyburski@gmail.com
1849 Page St, 204
San Francisco, California 94117

From: [White, Elizabeth \(CPC\)](#)
To: [CPC.HousingElementUpdateEIR](#)
Subject: FW: Planning Dept/Housing Element 2022
Date: Thursday, July 7, 2022 7:03:11 AM
Attachments: [S.F.Housing Element 2022 document .docx](#)

From: victoria underwood <victoria.underwood@att.net>

Sent: Wednesday, July 06, 2022 11:54 PM

To: rich.hills@sfgov.org; White, Elizabeth (CPC) <elizabeth.white@sfgov.org>; rachael.tanned@sfgov.org; Moore, Kathrin (CPC) <kathrin.moore@sfgov.org>; Diamond, Susan (CPC) <sue.diamond@sfgov.org>; Fung, Frank (CPC) <frank.fung@sfgov.org>; Koppel, Joel (CPC) <joel.koppel@sfgov.org>; Imperial, Theresa (CPC) <theresa.imperial@sfgov.org>; .ruiz@sfgov.org; Ruiz, Gabriella (CPC) <gabriella.ruiz@sfgov.org>; CPC-Commissions Secretary <commissions.secretary@sfgov.org>

Cc: Donovan, Dominica (BOS) <dominica.donovan@sfgov.org>; Stefani, Catherine (BOS) <catherine.stefani@sfgov.org>

Subject: Planning Dept/Housing Element 2022

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

Please see Attached Letter

Richard Frisbie <frfbeagle@gmail.com>

To: Richard Frisbie

Fri, Jul 1 at 2:54 PM

San Francisco needs more housing, everyone agrees on that. It should be based on a transparent and open process that is citywide and equitable in its impact. I think everyone can agree on that.

BUT, the SF PLanning Dept. is attempting to impose a draconian overhaul of neighborhoods in its Housing Element 2022 document partly in response to directives passed down from Sacramento.

SF Planning Department-Housing Element.

<https://www.sfhousingelement.org/>

Here's a map that sums up the issue, it is buried on page 185(of 616) of the Draft

EIR.

I am preparing a fairly lengthy description of the document but in the short term, early next week, we need to communicate with our Supervisor and the Planning Commission our strong opposition to the proposed Draft EIR but more importantly to the process employed by the Planning Department to slip what is truly a once-in-a-generation change past the public with the absolute minimum of public awareness, knowledge and as little input as possible from the public.

No one was notified of this document, its presence buried within the planning department's website-innocuous and unseen. A simple property re-development in San Francisco requires more public neighborhood notification than the planning department has provided for this massive proposed change.

For a major housing development the planning department is required to hold multiple public hearings prior to the issuance of a Draft EIR but apparently a total remake of swaths of the city and destruction of neighborhoods, including historic ones, can be carried out without ever seeing the light of day.

The planning department public process has been minimal, the notification of neighborhoods impacted, residents impacted, etc. has been equally non-existent.

Even though I took exception to some of the decisions of the prior management of the planning department I give it full credit for its scrupulous commitment to carrying out public outreach programs and notifications but the current management appears to feel no such commitment to a fair, open, transparent process. This is very unfortunate.

There is a planning commission hearing on July 12th which needs to be postponed until such time as the planning department has carried out a comprehensive public outreach program, in person and/or Zoom-TBD, that includes meetings in each of the major neighborhoods impacted. I don't think this is an unreasonable request for such a critical and impactful matter.

It's worth noting that our Redistricting process included over 30 public hearings and published all of the comments. Now I would agree that Redistricting is a critical issue impacting political representation, but at least we get to weigh in on it every 10 years.

The changes being proposed by the planning department are permanent and irreversible changes to the face and character of swaths of the city and are being carried out in a very opaque and controlled process out of sight of the public. This is not acceptable.

Please send an email to the Supervisor, the Planning Commission and the Planning Department (contact info attached). Some items to be considered, or choose your own.

1. The July 12 hearing of the Housing Element 2022 Draft EIR needs to be postponed. The July 12th Hearing comes on the heels of a failed process by the Planning Department.
2. There has been no open and transparent process and no public hearings whatsoever. No notifications have ever been issued on this subject to the public at large.
3. Burying such a critical issue within the Planning Department's website is not an open and transparent method of notifying the public, it's

quite the opposite-it's opaque and secretive. As the Washington Post states "Democracy Dies in Darkness."

4. No public hearings on what is clearly a once-in-a-generation change to the heights, size, bulk, density as well as the character of neighborhoods have taken place. This needs to be rectified.
5. Historical significance neighborhoods are being demolished under this plan. This needs to be analyzed in great detail.

If you have a single point make it "the July 12th Hearing is based on a Process that is flawed, opaque, secretive and absent any public outreach program whatsoever. This is unacceptable and requires the hearing to be postponed and the process corrected."

I'll try and get out a more complete explanation this weekend, no promises but please take a moment and send an email. We have to slow down this run amok process that has excluded us up to now.

Thanks,
Dick Frisbie

From: [White, Elizabeth \(CPC\)](#)
To: [CPC.HousingElementUpdateEIR](#)
Subject: FW: 7/7/2020 Zoom call/Housing Element considerations
Date: Monday, July 11, 2022 7:56:25 AM
Attachments: [S.F. Housing Element Zoom Follow-up 7-7-2022.docx](#)

From: victoria underwood <victoria.underwood@att.net>

Sent: Friday, July 08, 2022 3:56 PM

To: Hillis, Rich (CPC) <rich.hillis@sfgov.org>; White, Elizabeth (CPC) <elizabeth.white@sfgov.org>

Cc: Caltagirone, Shelley (CPC) <shelley.caltagirone@sfgov.org>; Leon-Farrera, Malena (CPC) <malena.leon-farrera@sfgov.org>; Tong, Reanna (CPC) <reanna.tong@sfgov.org>

Subject: 7/7/2020 Zoom call/Housing Element considerations

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

This email attachment is in follow-up to our Zoom call yesterday. I thank you for your time and consideration in advance.

Respectfully,
Victoria Underwood

It was positive that we were all able to make it to the Zoom call today (7/7/2022). I felt I needed to sit back and get an overall better understanding of the Planning Departments approach to the challenges the city agencies undertaking to meet the very specific requirements set by the state as the city moves forward in the process to their eight (8) year update of the S.F. Housing Element for 2022.

First, I see you are faced with many challenges such as integrating affordable housing throughout the city. I commend those efforts and it sounds like everyone is invested in the objectives for equality and affordability for all residents which is a must but a huge challenge.

I've held accumulation of positions during my past 43-year professional career in real estate that has provided me with the ability to step back and look at the bigger picture, come up with a plan and then drill down to simplicity but from the perspective of all parties.

I make no claim to having any experience in government or politics which are one in the same. I admit my perspective may not mesh with the parameters of operating within city government, but I hope that my input will not simply be dismissed for that reason.

Today I listened and processed what I heard. I formulated some thoughts to add to my email of last night about looking into the future growth and resilience of S.F. businesses and the long-term housing dilemmas facing S.F.

1 I heard several area neighbors express their despair over repeatedly not hearing about local projects as well as impactful decisions under consideration by the Planning Department like those discussed today. They have been very much involved with the review of projects ultimately approved by the Planning Department already. The suggesting that a distribution list of the neighborhood district associations primary contacts be created at your office to open the lines of communication when it is too early to trigger the "official" notice requirements but, nonetheless of concern while under review and consideration. We look forward to more dialogues such as we engaged in today on potentially impactful property related matters under review by your department.

2 We know that owners and developers would love to be able to eliminate all the investigative possesses associate with building and land use but that is not for the better good of those who are impacted by these projects. Along that line, Richard Frisbie had a serious and impactful question about the impact of increased housing quotas of 2.5 million units potentially in the state and the depletion of our water resources not only in this state but around the world due to draughts brought on by climate change. Kicking that to the State since Sacramento is imposing these housing numbers on the San Francisco is something that not only seems to need to be addressed for the future but for the foreseeable sustainable use. Of the residents and businesses in San Francisco.

3 Some other callers bought up some of the same subject matters I did in yesterday's email. One was about the conversion of some of the commercial buildings that remain vacant downtown which I addressed yesterday but feel it's worth mentioning again below. The response surprised me that the city is waiting for the commercial building owners to approach "the city" if they are interested in converting their buildings to residential and you stated that if it is zoned Commercial it's automatically "Residential" I have never heard of that before.

I go back to “The City” having a plan and engaging with building owners either through BOMA or other professional organizations and brokers to find out which building owners and buildings might be considered for a relatively easy conversion into either Work/Play/Live occupancy or into retail/residential.

By way of example only, certain properties like the Embarcadero Center building complex could convert one or more of their buildings to residential or 1-3 reducing or consolidating office users and modifying some into residential unit floors. The Embarcadero Center businesses have been devastated by the pandemic because their use is retail and office. I see this time as an opportunity to bring residential into the downtown and financial area to increase foot traffic, sustain retail and restaurant businesses and other services to include weekends and holidays and create a occupancy balance like so many buildings need to be in the financial district and surrounding areas.

3
Cont'd

With so many buildings having the core infrastructure, multiple elevator bays to service specific floors, and substantial lobbies, all three uses could find a home and find economic support in each other. Modification of empty or semi-empty, high-rise buildings could provide the repeat business and the draw needed to be able to be profitable in good times and be sustainable in challenging times. It also can potentially provide a built-in work force to the area and increased housing units.

The downtown district would be a draw for new locals that would enjoy all the services in the area and easy Bart access, buses and trolleys, the street cars, concerts, the stadium, all the bars and restaurants and the Chase Center etc. Kearney Street from Market to California has suffered from vacancies and seems prime for a revitalization of new and converted buildings and the creation of more housing and support services there too. We have always gone big but now it's about tiny homes and smaller apartments that are fully loaded and comfortable units for couples and singles. It's the future and N.Y. has not only done it but made it lucrative, convenient and in demand for working people who want it all. Everyone's footprint needs to get smaller. Even Pacific Heights is maintaining the historical value and aesthetics of huge single-family homes at the same time converting them into multi-family homes/condos because it makes sense for everyone.

Seeing the map of our area as a targeted location for implementation of the future growth is what got everyone's attention and dander up only to hear, “Oh, it's just an example”. Clearly, the Geary resident expressed her concerns for the future which we all share. Hopefully, the city won't do to Geary what it did to Van Ness and decimate the businesses and make this major thoroughfare an absolute nightmare for 10 years.

4

I started thinking about the buildings on Geary that would be prime for redevelopment projects to meet your housing requirements and alleviate the concern of residents like the woman who expressed hers.

Again, by way of example, the buildings between the new condo building on the corner of Stanyan and Geary to the east and the Aging Center and the Chevron Station to the west on the southeast side of the Arguello and Geary intersection would be ripe for the city to target that location for a substantial affordable housing redevelopment project. The old Pier One building has been boarded up along with others. An AT&T store suddenly appeared where a pizza parlor was.

The same for the building at the opposite corner at the NW corner of the Arguello intersection of Geary is the Office Depot building that has partially been vacant forever. Businesses can be incentivized to relocated. That is a huge lot and connects the Geary buses, the Parnassus bus and the #1 California. These could be vital blocks but currently dead zones that are exactly as you described the city wanting. No residents to lose their homes and these old concrete buildings will be replaced.

Another is the building occupied by Ross and Walgreens at 17th and Geary. Another huge lot. I would think the city with a developer, could secure these sites for affordable housing. I can't imagine it would take many to put a huge dent in the need for working and affordable housing. There are banks in the area, restaurants, coffee houses and sandwich shops, and any number of services. A block away is the approved former Alexandria Theater Building that has been shamefully vacant since "2004" will become an affordable housing and special use building.

I've suggested some parcels that are seemingly ripe for redevelopment with low community impact on the Geary Corridor because that was the example you used today and I'm familiar with the area from riding the 38 Muni Line. The reality is some areas are more easily conducive to more housing where the topography and the difficulty of creating transit hubs in the northside of the city is not realistic.

Neighbors asked yesterday where approved buildings and projects not yet built fit into the equation. The answer was that they do but currently they are not being built because people have moved out of the state (so how does one justify building more housing) construction costs go up. Additionally, it sounds like the city may be able to accomplish getting 5,000 residential units built per year up to 10,000 so you will never meet the prescribed 50,000.

If nothing, I've offered up a vision that could become a plan to convert existing buildings with cooperative owners to potentially support mixed uses and produce more housing units and foot traffic as well as bring more ridership into the city on Bart and create a more vibrant downtown neighborhood.

Additionally, there are dead zones like Van Ness, Kearny, and other areas on Market Street from Van Ness to the Hyatt Regency for which there is no excuse for the condition of a lot of these buildings. Some Geary areas are ripe for multi-tenant and multi-use conversions. Market Street is the main transit corridor in this city and buildings are boarded up and the streets so filthy and unsafe to walk and there is no reason to allow that to continue given what we are facing. In these times it's difficult to build new; costly, taking years start to finish, and impactful to communities. The truth is, we haven't exhausted the potential of the existing buildings we have now. I love city but it's not meeting its full existing potential.

One needs to have a plan, to secure buildings sitting on these specific, large size parcels in areas all over the city that can be acquired and/or converted to be used for the purpose of building affordable housing without impacting already vibrant neighborhoods in a negative way.

5
Cont'd

What comes first the chicken or the egg? Who knows? But I wish I could feel like the city has vision. With the participation of the real estate community and building owners, you can take the existing inventory of buildings in some of these areas already serviced by transit services and adapt them into places people want to Live/Work/Play.

I see this as the most [timely and efficient way](#) to meet the business and housing challenges facing our city. We need a revitalization. A constructive and inspiring way to bring this city back but with a new vision. Not one building should be boarded up and abandoned. Build or demolish. Not one family should be struggling on the street or city workers not being able to Live/Work/Play with dignity within the borders in San Francisco. It's not just about the current problems we need to meet but having that plan that also sets the table for this city's future growth and needs. Question is can we get out of our own way and meet the challenges and the goals we seek.

Thank you for your time.

Respectfully,

Victoria Underwood

CC: Distribution List – Planning Dept

From: Srinivasan Vijayaraghavan <info@email.actionnetwork.org>
Sent: Wednesday, June 8, 2022 9:54 AM
To: jonas.ionin@sfgov.org
Subject: Prevent sprawl in the 2022 housing element (file 2019-016230ENV)

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

Planning Commission Secretary Jonas Ionin,

This Environmental Impact Report fails to recognize the statewide and regional environmental benefits of higher-growth alternatives. On the contrary, the report considers the No Project Alternative environmentally superior as 50,000 less housing units would be planned for (S-5). This couldn't be further detached from reality:

According to a study by Apartment List on 2017 data, the Bay Area and its exurbs had the nation's highest share of super commuters traveling 90 min or more to work. Building less housing units in San Francisco forces people to live in such places where they produce more CO2, displace wildlife, fill wetlands, bulldoze scenic vistas, disrupt the management of wildfire, and congest highways. Building new housing in San Francisco on the other hand would allow those people to take advantage of our public transit systems and live in energetically efficient multi-family units.

Therefore, I ask you to in particular reconsider Impact GHG-1 for the No Project Alternative to reflect the higher greenhouse gas emissions this alternative would cause, and study rezoning for over eighty thousand additional units, as our RHNA requires, which would have significant positive environmental benefits.

I support Professor Chris Elmendorf's comments on the DEIR:

<https://url.avanan.click/v2/> https://drive.google.com/file/d/10pIS1Sd6T7FdKBkgd5DD1MbOsEnJgbE1/view_.YXAzOnNmZHQyOmE6bzplZmZkMGQxNjdiMWJiZmFhMTEwMDFiMDg0YTYzMDYzMjo2OjFIYTA6MzlwNTJkYzdY2NINTM5M2M1Y2M2Y2MzNWl5ZWl3MDQ5N2EzNTFhOWU4MTAxM2ZiNTMzMzNkNDkzYTFjMWE1Mjp0OIQ

Srinivasan Vijayaraghavan
srinivasanv93@gmail.com
1300 Funston Ave
San Francisco, California 94122

From: David Watson <info@email.actionnetwork.org>
Sent: Wednesday, June 8, 2022 11:22 AM
To: jonas.ionin@sfgov.org
Subject: Hearing item 11: take our housing goals seriously in the Draft EIR

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

Planning Commission Secretary Jonas Ionin,

This Environmental Impact Report does not fully accommodate San Francisco's RHNA requirements. The DEIR seeks to satisfy Mayor Ed Lee's 2017 goal of producing 5,000 homes per year through 2050. But San Francisco's 2023-2030 RHNA is 82,069 units, which is roughly 10,000 homes per year. The DEIR's sites inventory report attempts to make up for this gap by rezoning for 20,000 units "above baseline," but this figure makes the faulty assumption that all units in the pipeline will actually become housing. To the contrary, Professor David Broockman's comment letter indicates that, based on the historical rate at which pipeline units turn into actual housing, San Francisco would need to rezone for 70,000 units above-baseline in order for the necessary inventory to actually come into existence.

By not fully accommodating San Francisco's RHNA, the DEIR sets San Francisco up for an enormous headache. Undershooting on the EIR would put an upper limit on the number of units produced by the city's housing element. This bind, in turn, would give the California HCD ground to reject the city's pipeline/status-quo capacity analysis. In the best case scenario, SF Planning would need to redo the requisite environmental review for a compliant plan prior to the deadline on a very limited time frame. This would mean long nights and early mornings struggling to meet a difficult deadline, and it would be unlikely to put SF Planning staff in a position to do their best work. In the worst case scenario, the city would be unable to meet the deadline altogether, thus falling out of compliance, losing affordable housing funds, and being exposed to the builder's remedy.

This course of events is still avertable. If the Planning Department writes an EIR for the proper number of units, San Francisco would be put in a much stronger position to pass a compliant housing element and avoid the consequences of being found out of compliance.

I urge you to heed the DEIR comments written by Professor Chris Elmendorf:

https://url.avanan.click/v2/https://drive.google.com/file/d/10pIS1Sd6T7FdKBkgd5DD1MbOsEnJgbE1/view_.YXAzOnNmZHQyOmE6bzo5NGVhNWlyYTVkNWE4NzgwYWQ0ZjczNjc3M2I0OTg4ND02OjExZWU6MmZiM2RjN2IzODdhNmUxMmY1NmRIY2ZhMDFiMzZhNGFiNDI5ZDAxZDExZWQ5NTA1ZjEzMjlmMjY0YjE1NjU1MTp0OIQ

David Watson
davidwatson@gmail.com
1787 Montecito Ave
Mountain View, California 94043

From: [Barbara Weinberg](#)
To: [Hillis, Rich \(CPC\)](#); [CPC.HousingElementUpdateEIR](#); [Moore, Kathrin \(CPC\)](#); [Fung, Frank \(CPC\)](#); [Koppel, Joel \(CPC\)](#); [Imperial, Theresa \(CPC\)](#); [Ruiz, Gabriella \(CPC\)](#); [Donovan, Dominica \(BOS\)](#); [Stefani, Catherine \(BOS\)](#); [Tanner, Rachael \(CPC\)](#); [Diamond, Susan \(CPC\)](#)
Subject: Proposed Building Height Limitation
Date: Sunday, July 10, 2022 9:59:19 AM

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

Dear Director of Planning Hillis and Planning Commission Members,

1 I am writing to express my objection to the proposed revision to the building height limitation from the existing 40 feet to 85 feet for Jordan Park.

2 I have lived in the same house on Commonwealth Avenue since 1976. I have raised my two sons in this home and my husband of 49 years passed away in this house. My three granddaughters who live a mile from me have spent several days a week in this house. Jordan Park has been and is a family oriented neighborhood, within walking distance of schools, parks, shopping and public transportation. It was established in the early years of the 20th century. The Jordan Park historic District is eligible for the California Register of Historical Resources under Criterion C (architecture). In fact, I often see people walking along my street and taking pictures of the unique architectural characteristics of these homes. The proposed height increase would destroy the existing fabric, scale and character of this neighborhood that qualifies for consideration as an Historical Resource.

I urge you to keep Jordan Park as the unique neighborhood that it is. San Francisco is evolving and changing, but it also needs special, historic areas to give it the character and charm that San Francisco has always been famous for.

Sincerely,
Barbara Weinberg

From: Charles Whitfield <info@email.actionnetwork.org>
Sent: Wednesday, June 8, 2022 10:02 AM
To: jonas.ionin@sfgov.org
Subject: Prevent sprawl in the 2022 housing element (file 2019-016230ENV)

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

Planning Commission Secretary Jonas Ionin,

This Environmental Impact Report fails to recognize the statewide and regional environmental benefits of higher-growth alternatives. On the contrary, the report considers the No Project Alternative environmentally superior as 50,000 less housing units would be planned for (S-5). This couldn't be further detached from reality:

According to a study by Apartment List on 2017 data, the Bay Area and its exurbs had the nation's highest share of super commuters traveling 90 min or more to work. Building less housing units in San Francisco forces people to live in such places where they produce more CO2, displace wildlife, fill wetlands, bulldoze scenic vistas, disrupt the management of wildfire, and congest highways. Building new housing in San Francisco on the other hand would allow those people to take advantage of our public transit systems and live in energetically efficient multi-family units.

Therefore, I ask you to in particular reconsider Impact GHG-1 for the No Project Alternative to reflect the higher greenhouse gas emissions this alternative would cause, and study rezoning for over eighty thousand additional units, as our RHNA requires, which would have significant positive environmental benefits.

I support Professor Chris Elmendorf's comments on the DEIR:

<https://url.avanan.click/v2/https://drive.google.com/file/d/10pIS1Sd6T7FdKBkgd5DD1MbOsEnJgbE1/view.YXAzOnNmZHQyOmE6bo5M2E0ZDc3ODcyMGM0MWFYjI3ZDE4NmY3ZDQ5MzdiOTo2OjJiMjI6ODI2MDIwY2lyNjY2ZTdhYTk4OWI2MDk4ODY0NWQxZTFmMzU2YmFmODdhMWEzMGNmMDUxMWM0MzUyYzI3YzNjOTp0OIQ>

Charles Whitfield
whitfield.cw@gmail.com
66 Cleary Court Apt 710
San Francisco, California 94109

From: [White, Elizabeth \(CPC\)](#)
To: [CPC.HousingElementUpdateEIR](#)
Subject: FW: Comments Housing Element 2022 Draft EIR
Date: Monday, July 11, 2022 7:14:22 AM

From: Miles&Company Inc. <lupine59f6@gmail.com>

Sent: Sunday, July 10, 2022 5:27 PM

To: Hillis, Rich (CPC) <rich.hillis@sfgov.org>; White, Elizabeth (CPC) <elizabeth.white@sfgov.org>; Caltagirone, Shelley (CPC) <shelley.caltagirone@sfgov.org>; Leon-Farrera, Malena (CPC) <malena.leon-farrera@sfgov.org>

Subject: Comments Housing Element 2022 Draft EIR

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

HOUSING ELEMENT 2022 Draft EIR Questions

Why did the Planning Department bury the notification of this monstrous plan to change our City on page 154 of the Draft EIR? The neighborhoods affected should have been notified by mail at the very least. What happened to honest and transparent Public Outreach to the citizens of San Francisco? As a tax-paying resident, I believe it is only just, that given the enormity of this project, which will affect at a minimum, the next three decades of this city's existence, San Franciscans should be given the opportunity to voice their questions and concerns in an open forum – not buried in an email in someone's queue.

The July 12th deadline for public comment needs to be rescheduled for a future date AFTER the Planning Department has conducted a thorough Public Outreach effort that includes all citizens affected by this project.

Questions and Comments:

1. Pg 2-5 Housing Element Background states: "Adoption of the Housing Element Update **WILL NOT**... **modify existing controls on land use, height or density**..."

2. Pg 2-11 Project Objectives states: "In well-resourced areas, the proposed action recommends **promoting** small and midrise multi-family development through **height increases** along certain transit corridors and through **removing density limits or increasing density limits** in low-density areas..."

3. Pg 2-24 Changes in Land Use Density and Distribution states: "**Modifying** allowable **density limits and increasing** allowable **height limits** along existing and projected rapid network transit corridors..." and "**removing or increasing** allowable **density limits** within 800 ft of these corridors..."

Contradictions anyone???

4. The business and residential landscape of the City has changed tremendously with the last several years, even before the pandemic ravaged our borders. High taxes and the sky-rocketing cost of living, not to mention the ever-growing homeless problem, have decimated our City's growth and reputation as a destination spot for tourists. The monoliths Oracle and Hewlett-Packard were only two of the 74 California based company headquarters that have left San Francisco in the first half of 2021 alone. Our city had the largest decline in population of any city in the country during the pandemic – 6.3% packed up and left. That equals 54, 813 residents.

5. Question: Did the Planning Department take into account those 54,813 homes that are now vacant? What about the empty buildings that housed the 74 companies that departed? Do we just leave them to disintegrate into the landscape and build anew??

6. Climate change is an ever-increasing devastation to our planet. California is in a constant state of drought with no good news in sight. The Hetch Hetchy Reservoir, which is our main source of water, supplies 2.6 million residents with fresh water. Wildfires are a given fact of nature in this state, amplified by climate change and continual drought, and intensify the strain on our natural resources, which continue to decrease with climate change and population growth.

7. Question: Where are we going to get the additional 7.5 million gallons of water for those new residents? Are we going to build another reservoir and hire a rainmaker??

These are only a few of the questions that need to be considered and discussed in an open and transparent Public Outreach forum, where all neighborhoods and residents can be involved in the future of our City. After

all, it is OUR CITY, too – not just yours.

Best Regards,

Calla Winkler

Resident, Laurel Heights

From: Nancy Wuerfel <nancenumber1@aol.com>
Sent: Saturday, July 16, 2022 4:56 PM
To: CPC.HousingElementUpdateEIR <CPC.HousingElementUpdateEIR@sfgov.org>
Subject: Comments on case # 2019-016230ENV, San Francisco Housing Element 2022 Update Draft EIR

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

July 16, 2022

To: San Francisco Planning Department

From: Nancy Wuerfel

RE: case # 2019-016230ENV, San Francisco Housing Element 2022 Update Draft EIR

Please include my comments in this email for consideration in revising the Draft EIR. Please acknowledge receipt of this email.


The Draft EIR fails to analyse the impacts on the water needed to protect the city from fires that will follow a major earthquake which is expected by the U.S Geological Survey to hit the Bay Area before 2043. These fires are a reasonably foreseeable impact that the EIR must consider and analyse how fires will be mitigated before enacting future implementation actions and development to increase housing.

The following facts about water use for firefighting have not been addressed:

- 1) San Francisco is a "retail customer" included in the Regional Water Supply System agreement.
- 2) San Francisco has approved the Water Shortage Allocation Plan (WSAP). This plan is to manage small shortfalls in water availability and may "call for retail customers to voluntarily ration" water (pg 4.9-18) "limiting rationing to no more than 20 percent on a system-side basis..."
- 3) Since all potable water to San Francisco is supplied by the Regional Water Supply System (RWSS) and is subject to the WSAP, the requirement to ration water by RWSS to retail customers will directly affect the initial source of water supplied to the SF Fire Department (SFFD) needed to suppress fires. This potable water is primarily accessed by the low-pressure hydrants throughout the city.
- 4) The backup source of firefighting water is from the independent high-pressure Auxiliary Water Supply System (AWSS) which uses non-potable water and seawater. The system was recently renamed the Emergency Firefighting Water System (EFWS).
- 5) The AWSS/EFWS does not provide firefighting water protection to all of San Francisco. It does not have high-pressure pipelines and hydrants to serve about half of the city. It does not have access to the unlimited seawater surrounding the city through pump stations on the westside or on the southeast side of the city that can immediately suppress fires. **Every gallon of seawater saves a gallon of potable water, but this offset is not recorded.**
- 6) Forecasted retail water demands used in the DEIR for 2020 through 2050 do not include all the potable water used by the SFFD because none of the firefighting water is either metered or billed. Therefore, the total impact of the Updated Housing Element on the need for more potable water cannot be recognized.

The DEIR cannot ignore the importance of preserving the housing that the new Element intends to build as well as preserving the housing already in existence. Supplying every neighborhood with access to low-pressure potable water connections and with high-pressure unlimited water pipeline connections and hydrants **must be included** in the Updated Housing Element, whether or not this water is metered.

1
Cont'd



The City has failed to conduct a comprehensive planning process that includes preservation of housing. The updated Element has a foreseeable direct impact which is not addressed. More housing requires more water resources that the Planning Department must make part of its plan. Even though it falls to the Public Utilities Commission to implement more water resources, the analysis of the Element's expansion of housing must include and be responsible for reporting on increased the need for water. Also, the SFFD's requirement for water should not be limited to the confines of the WASP.

Thank you for considering implementation of my comments in the Updated Housing Element.

Sincerely,
Nancy Wuerfel
San Francisco

From: calmbrezz@aol.com
To: [CPC.HousingElementUpdateEIR](#)
Cc: olhart120@gmail.com
Subject: Proposed Height Limit in Jordan Park Neighborhood
Date: Friday, June 17, 2022 7:32:27 AM

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

1 ■ We are requesting an extension, as this element of the study has not been adequately disclosed to San Francisco's neighborhood associations and citizens.

Thank you,

DICK & JAN YAMAGAMI
42 Commonwealth Ave
San Francisco, CA 94118
415 221 9059

ATTACHMENT 3

Historic Preservation Commission Public Hearing Transcript

**SAN FRANCISCO
HISTORIC PRESERVATION COMMISSION**

**HYBRID HEARING
HELD ON WEDNESDAY, JUNE 1, 2022**

**SAN FRANCISCO HOUSING ELEMENT
ITEM 7**

**COMMISSION CHAMBERS, ROOM 400
CITY HALL, 1 DR. CARLTON B. GOODLETT-PLACE
SAN FRANCISCO, CA 94102-4689**

TRANSCRIBED: JUNE 16, 2022

BY: MIA CAMERA

**JAN BROWN & ASSOCIATES
WORLDWIDE DEPOSITION & VIDEOGRAPHY SERVICES
701 Battery Street, 3rd Floor, San Francisco, CA 94111
(415) 981-3498 or (800) 522-7096**

ITEM 7

DRAFT ENVIRONMENTAL IMPACT REPORT

**HISTORIC PRESERVATION COMMISSION
HOUSING ELEMENT 2022 UPDATE**

COMMISSIONERS IN ATTENDANCE:

**DIANE MATSUDA, PRESIDENT
RUCHIRA NAGESWARAN, VICE PRESIDENT
KATE BLACK
CHRIS FOLEY
RICHARD S. E. JOHNS
LYDIA SO
JASON WRIGHT**

JONAS IONIN, SECRETARY

PRESENTERS:

**LISA GIBSON, ENVIRONMENTAL REVIEW OFFICER
ALLISON VANDERSLICE, PLANNING DEPARTMENT**

PUBLIC COMMENT:

GEORGIA SCHUTTISH

---OOO---

1 JUNE 1, 2022

2 12:30 P.M.

3 P R O C E E D I N G S

4 ---OOO---

5 JONAS IONIN: GOOD AFTERNOON AND WELCOME TO THE
6 SAN FRANCISCO HISTORIC PRESERVATION COMMISSION HYBRID
7 HEARING FOR JUNE 1ST, 2022.

8 IN PERSON AND REMOTE HYBRID HEARINGS WILL
9 REQUIRE EVERYONE'S ATTENTION AND MOST OF ALL OUR
10 PATIENCE.

11 IF YOU ARE JOINING US REMOTELY AND ARE NOT
12 SPEAKING, PLEASE MUTE YOUR MICROPHONE TO ENABLE PUBLIC
13 PARTICIPATION.

14 SFGOVTV IS BROADCASTING AND STREAMING THIS
15 HEARING LIVE, AND WE WILL RECEIVE PUBLIC COMMENT FOR
16 EACH ITEM ON TODAY'S AGENDA.

17 COMMENTS ARE OPPORTUNITIES TO SPEAK DURING THE
18 PUBLIC COMMENT PERIOD ARE AVAILABLE BY CALLING
19 415-655-0001 AND ENTERING ACCESS CODE# 24992017651.

20 WE WILL TAKE PUBLIC COMMENT FROM PERSONS IN THE
21 CHAMBERS FIRST AND THEN OPEN UP THE REMOTE ACCESS LINE.

22 PLEASE, SPEAK CLEARLY AND SLOWLY, AND IF YOU
23 CARE TO, DO STATE YOUR NAME FOR THE RECORD.

24 EACH SPEAKER WILL BE ALLOWED UP TO
25 THREE MINUTES, AND WHEN YOU HAVE 30 SECONDS REMAINING,

1 YOU WILL HEAR A CHIME INDICATING YOUR TIME IS ALMOST UP.

2 WHEN YOUR ALLOTTED TIME IS REACHED, I WILL
3 ANNOUNCE THAT YOUR TIME IS UP AND TAKE THE NEXT PERSON
4 QUEUED TO SPEAK FOR THOSE PERSONS CALLING IN TO SUBMIT
5 THEIR TESTIMONY.

6 WHEN WE REACH THE ITEM YOU ARE INTERESTED IN
7 SPEAKING TO, PLEASE PRESS *3 TO BE ADDED TO THE QUEUE.
8 WHEN YOU HEAR THAT YOUR LINE HAS BEEN UNMUTED, THAT IS
9 YOUR INDICATION TO BEGIN SPEAKING.

10 BEST PRACTICES ARE TO CALL FROM A QUIET
11 LOCATION, SPEAK CLEARLY AND SLOWLY, AND PLEASE MUTE THE
12 VOLUME ON YOUR TELEVISION OR COMPUTER.

13 FOR THOSE PERSONS ATTENDING IN PERSON, PLEASE
14 LINE UP ON THE SCREEN-SIDE OF THE ROOM, AND WE WILL TAKE
15 YOU IN THE ORDER THAT YOU LINED UP.

16 AND FOR THOSE PERSONS IN THE CHAMBER, PLEASE
17 SILENCE ANY MOBILE DEVICES THAT MAY SOUND OFF DURING
18 THESE PROCEEDINGS.

19 I WOULD LIKE TO TAKE ROLL AT THIS TIME:

20 COMMISSION PRESIDENT MATSUDA?

21 PRESIDENT MATSUDA: HERE.

22 JONAS IONIN: COMMISSION VICE PRESIDENT
23 NAGESWARAN?

24 RUCHIRA NAGESWARAN: HERE.

25 JONAS IONIN: COMMISSIONER BLACK?

1 KATE BLACK: HERE.

2 JONAS IONIN: COMMISSIONER FOLEY?

3 CHRIS FOLEY: PRESENT.

4 JONAS IONIN: COMMISSIONER JOHNS?

5 RICHARD JOHNS: HERE.

6 JONAS IONIN: COMMISSIONER SO?

7 LYDIA SO: HERE.

8 JONAS IONIN: AND COMMISSIONER WRIGHT?

9 JASON WRIGHT: HERE.

10 JONAS IONIN: THANK YOU, COMMISSIONERS. FIRST
11 ON YOUR AGENDA IS GENERAL PUBLIC COMMENT. AT THIS TIME
12 MEMBERS OF THE PUBLIC MAY ADDRESS THE COMMISSION ON THE
13 ITEMS OF INTEREST TO THE PUBLIC THAT ARE WITHIN THE
14 SUBJECT MATTER JURISDICTION OF THE COMMISSION EXCEPT
15 AGENDA ITEMS.

16 WITH RESPECT TO AGENDA ITEMS, YOUR OPPORTUNITY
17 TO ADDRESS THE COMMISSION WILL BE AFFORDED WHEN THE ITEM
18 IS REACHED IN THE MEETING. EACH MEMBER OF THE PUBLIC
19 MAY ADDRESS THE COMMISSION FOR UP TO THREE MINUTES.

20 GEORGIA SCHUTTISH: THREE OR TWO. IT SAYS TWO
21 IN THERE.

22 DO I GET THREE OR TWO?

23 JONAS IONIN: GEORGIA, WE WILL GIVE YOU THREE.

24 GEORGIA SCHUTTISH: GRACIAS. GOOD AFTERNOON,
25 COMMISSIONERS. I'M GEORGIA SCHUTTISH.

1 I SENT YOU AN E-MAIL OVER THE WEEKEND OR THE
2 OTHER DAY ABOUT AB 916. IF YOU DIDN'T GET TO READ IT,
3 I'LL READ IT TO YOU IN A MINUTE.

4 BUT I JUST WANTED TO GIVE YOU QUICKLY THE
5 HISTORY. IT WAS INTRODUCED IN THE ASSEMBLY IN JANUARY
6 -- NO, FEBRUARY OF 2021. IT WAS AMENDED IN APRIL OF
7 2021, AND IT WAS PASSED BACK IN JANUARY 2022, AND IT WAS
8 SUPPOSED TO BE AT THE HOUSING COMMITTEE YESTERDAY, BUT
9 IT WASN'T BECAUSE IT'S GOT A CONFLICT WITH ANOTHER ADU
10 BILL.

11 BUT THE PART THAT CONCERNS ME IS NOT THE ADU.
12 AND I THINK ANYBODY, AND I WILL PARAPHRASE BOB DYLAN,
13 "YOU DON'T HAVE TO BE A LAWYER TO READ IT." AND IT
14 SAYS: NOTWITHSTANDING ANY OTHER LAW WITH RESPECT TO
15 LAND ZONED FOR RESIDENTIAL USE, THE LEGISLATIVE BODY OF
16 A CITY OR COUNTY SHALL NOT ADOPT OR ENFORCE AN ORDINANCE
17 REQUIRING A PUBLIC HEARING AS A CONDITION OF ADDING
18 SPACE FOR ADDITIONAL BEDROOMS OR RECONFIGURING EXISTING
19 SPACE TO INCREASE THE BEDROOM COUNT WITHIN AN EXISTING
20 HOUSE, CONDO, APARTMENT OR DWELLING.

21 ORIGINALLY IT WAS ONE BEDROOM BUT THAT'S WHAT
22 THEY CHANGED LAST APRIL.

23 SO, I DON'T KNOW. HOW WOULD THIS AFFECT YOU?
24 THIS COMMISSION? WITH THE HISTORIC PROPERTIES NO LONGER
25 QUALIFY UNDER SB 9?

1 WHAT ABOUT 950 LOMBARD? OR 49 HOPKINS? WHAT
2 ABOUT 2417 GREEN WHICH WAS THE SPEC PROJECT NEXT DOOR
3 TO THE COXHEAD HOUSE.

4 SO, IT'S -- THIS IS -- IT'S -- I MEAN, IT IS
5 UNBELIEVABLE TO ME. I'M SORRY. I DON'T MEAN TO ACT
6 EMOTIONAL. BUT IT IS UNBELIEVABLE TO ME THAT THIS THING
7 WAS SITTING AROUND FOR OVER A YEAR, AND NOBODY KNEW
8 ABOUT IT. I ONLY KNEW ABOUT IT BECAUSE I HAPPENED TO
9 READ THE BIC SUPPORTING DOCUMENTS FOR MAY, AND THERE IT
10 WAS IN A SUMMARY THAT WAS FROM THE CALIFORNIA BUILDING
11 OFFICIALS.

12 SO, THAT'S THE HISTORY. I HAVE A MINUTE LEFT.
13 I DON'T THINK I NEED TO SAY ANYTHING MORE. I THINK THE
14 PLANNING DEPARTMENT IS AWARE OF IT; DBI IS AWARE OF IT;
15 I'VE CONTACTED THE BIC, AND I'VE CONTACTED THE BOARD OF
16 APPEALS.

17 BUT I THINK IT'S PRETTY CLEAR, AND IF YOU -- I
18 HAVE A COPY, BUT I THINK YOU ALL GOT A COPY, BUT
19 YOU CAN FIND IT AB 916.

20 SO, I DON'T KNOW WHAT'S GOING TO HAPPEN IF THE
21 -- AH, IT'S AB 897 I THINK THAT'S GOT THE CONFLICT.
22 THAT'S WHY IT WAS SORT OF PULLED.

23 BUT AB 917 IS FROM SENATOR WIECKOWSKI, WHO'S THE
24 KING OF ADUS, AND HE'S TRYING TO GET IT WORKED OUT THAT
25 IT BE HEARD -- BUT IT COULD BE HEARD SOMETIME IN THE

1 NEXT MONTH. SO, I JUST WANTED YOU TO ALL BE AWARE OF
2 IT, AND IT'S SOMETHING TO THINK ABOUT.

3 THANK YOU VERY MUCH.

4 JONAS IONIN: OKAY. THANK YOU. LAST CALL FOR
5 GENERAL PUBLIC COMMENT. THOSE PERSONS IN THE CHAMBERS,
6 PLEASE COME FORWARD OR IF YOU ARE CALLING IN REMOTELY,
7 YOU NEED TO PRESS *3.

8 SEEING NO ADDITIONAL REQUESTS TO SPEAK AT THIS
9 TIME, GENERAL PUBLIC COMMENT IS CLOSED, AND WE CAN MOVE
10 ON TO DEPARTMENT MATTERS.

11 ITEM 1, DEPARTMENT ANNOUNCEMENTS.

12 RICH SUCRE: MY APOLOGIES. GOOD AFTERNOON,
13 COMMISSIONERS. RICH SUCRE, DEPARTMENT STAFF.

14 I JUST WANTED TO PROVIDE YOU WITH AN UPDATE ON
15 SOME OF YOUR LANDMARK NOMINATIONS THAT HAVE BEEN MOVING
16 FORWARD THROUGH THE BOARD OF SUPERVISORS.

17 THE TROCADERO CLUBHOUSE IS PENDING SIGNATURE
18 WITH THE MAYOR.

19 AT THE FULL BOARD PASSING ITS FIRST READ WAS THE
20 MISSION CULTURAL CENTER FOR LATINO ARTS.

21 AND THEN RECENTLY AT THE LAND USE COMMITTEE, THE
22 LANDMARK DESIGNATION FOR THE INTERIOR OF THE CASTRO
23 THEATRE WAS INTRODUCED AS WELL AS A LANDMARK INITIATION
24 FOR THE INTERSECTION OF TURK AND TAYLOR, SO IT RELATED
25 TO THE COMPTON'S TRANSGENDER SITE, AND SO, THAT'S ALL I

1 HAVE FOR OUR REPORT.

2 JONAS IONIN: THANK YOU, MR. SUCRE.

3 IF THERE ARE NO QUESTIONS, WE CAN MOVE ON TO
4 COMMISSION MATTERS, ITEM 2, PRESIDENT'S REPORT AND
5 ANNOUNCEMENT.

6 PRESIDENT MATSUDA: SO IT'S MY UNDERSTANDING
7 THAT WE HAVE A FEW ITEMS THAT NEED TO BE REVIEWED BY THE
8 ARCHITECTURAL REVIEW COMMITTEE, AND WE HAVEN'T HAD, AND
9 I ANNOUNCE IT HERE, THE ARCHITECT --

10 JONAS IONIN: WE ACTUALLY HAVE A SEPARATE LINE
11 ITEM FOR IT AFTER THIS.

12 PRESIDENT MATSUDA: OKAY. THEN I DON'T HAVE ANY
13 PRESIDENT'S REPORTS OR ANNOUNCEMENTS AT THIS TIME.

14 JONAS IONIN: VERY GOOD.

15 PRESIDENT MATSUDA: SO, THANK YOU.

16 JONAS IONIN: ITEM 3 CONSIDERATION OF ADOPTING
17 DRAFT MINUTES FROM MAY 4TH, 2022. WE SHOULD OPEN UP
18 PUBLIC COMMENT.

19 MEMBERS OF THE PUBLIC, AT THIS TIME YOU MAY
20 ADDRESS THE COMMISSION ON THE MINUTES IF YOU CARE TO.
21 THOSE PERSONS IN THE CHAMBER, PLEASE COME FORWARD, AND
22 THOSE CALLING IN REMOTELY, PLEASE PRESS *3.

23 OKAY. SEEING NO REQUESTS TO SPEAK AT THIS TIME,
24 PUBLIC COMMENT IS CLOSED AND THE MINUTES ARE NOW BEFORE
25 YOU, COMMISSIONERS.

1 >>>: I MOVE THEY BE APPROVED.
2 JONAS IONIN: THANK YOU.
3 ON THAT MOTION TO APPROVE OR ADOPT THE MINUTES,
4 COMMISSIONER WRIGHT?
5 JASON WRIGHT: YES.
6 JONAS IONIN: COMMISSIONER BLACK?
7 KATE BLACK: YES.
8 JONAS IONIN: COMMISSIONER FOLEY?
9 CHRIS FOLEY: AYE.
10 JONAS IONIN: COMMISSIONER JOHNS?
11 RICHARD JOHNS: YES.
12 JONAS IONIN: COMMISSIONER SO?
13 LYDIA SO: YES.
14 JONAS IONIN: COMMISSIONER NAGESWARAN?
15 RUCHIRA NAGESWARAN: YES.
16 JONAS IONIN: AND COMMISSION PRESIDENT MATSUDA?
17 PRESIDENT MATSUDA: YES.
18 JONAS IONIN: SO MOVED, COMMISSIONERS. THAT
19 MOTION PASSES UNANIMOUSLY 7 TO 0. AND WE WILL PLACE
20 THIS UNDER ITEM 4, COMMISSION COMMENTS AND QUESTIONS.
21 BEING NO REQUESTS TO SPEAK, COMMISSIONERS, WE
22 CAN MOVE ON THEN TO ITEM 5, THE ARCHITECTURE REVIEW
23 COMMITTEE APPOINTMENTS.
24 PRESIDENT MATSUDA: SORRY, I MISSPOKE.
25 I'D LIKE TO MAKE THE APPOINTMENTS TO THE

1 ARCHITECTURAL REVIEW COMMITTEE AT THIS TIME.

2 I HAVE ASKED VICE PRESIDENT RUCHIRA NAGESWARAN
3 TO SERVE AS THE CHAIR OF THE COMMITTEE AND HAVE ASKED
4 COMMISSIONERS BLACK AND SO TO SIT WITH COMMISSIONER
5 NAGESWARAN ON THE ARC, AND I APPRECIATE YOUR WILLINGNESS
6 TO DO THIS.

7 WE HAVE SOME VERY IMPORTANT ITEMS THAT WILL BE
8 COMING UP I BELIEVE WITHIN THE NEXT COUPLE OF WEEKS, SO
9 WE REALLY APPRECIATE YOUR SUPPORT.

10 JONAS IONIN: THANK YOU FOR THAT, COMMISSION
11 PRESIDENT MATSUDA.

12 AND JUST AS A HEADS UP TO THE NEW APPOINTEES, WE
13 WILL HAVE AN ITEM ON JUNE 15TH. TYPICALLY, WE HELD THE
14 ARCHITECTURAL REVIEW COMMITTEE BEFORE THE REGULAR
15 AGENDA, AND SO, UNLESS I HEAR DIFFERENTLY, WE WILL
16 CONTINUE TO DO SO.

17 AND SO TYPICALLY, IF THERE IS ONE ITEM, WE WILL
18 START AT NOON. IF THERE ARE A COUPLE OF ITEMS, WE MIGHT
19 START AT 11:30, OR IF THE ONE ITEM WE FEEL WILL TAKE A
20 LONG TIME, WE WILL START AT 11:30 AS WELL. THANK YOU.

21 PRESIDENT MATSUDA: THANK YOU.

22 JONAS IONIN: ITEM 6 CASE NO. 2021-009976CRV FOR
23 REMOTE HEARINGS.

24 AGAIN, COMMISSIONERS, THIS IS IN THE EVENT THAT
25 NONE OF YOU CAN ACTUALLY ATTEND IN PERSON, AND WE WOULD

1 THEN BE FORCED TO CONTINUE THE CITY'S BUSINESS REMOTELY.

2 ANY MEMBER OF THE PUBLIC WISH TO SPEAK TO THE
3 COMMISSION ON REMOTE HEARINGS? SEEING NONE, PUBLIC
4 COMMENT IS CLOSED AND THIS RESOLUTION IS NOW BEFORE YOU.

5 >>>: MOTION TO APPROVE.

6 >>>: SECOND.

7 JONAS IONIN: THANK YOU, COMMISSIONERS. ON THAT
8 MOTION THEN TO ADOPT A RESOLUTION TO ALLOW FOR REMOTE
9 HEARINGS IF NECESSARY.

10 ON THAT MOTION, COMMISSIONER WRIGHT?

11 JASON WRIGHT: YES.

12 JONAS IONIN: COMMISSIONER BLACK?

13 COMMISSIONER BLACK: YES.

14 JONAS IONIN: COMMISSIONER FOLEY?

15 CHRIS FOLEY: AYE.

16 JONAS IONIN: COMMISSIONER JOHNS?

17 RICHARD JOHNS: YES.

18 JONAS IONIN: COMMISSIONER SO?

19 COMMISSIONER SO: YES.

20 JONAS IONIN: COMMISSIONER NAGESWARAN?

21 COMMISSIONER NAGESWARAN: YES.

22 JONAS IONIN: AND COMMISSION PRESIDENT MATSUDA?

23 PRESIDENT MATSUDA: YES.

24 JONAS IONIN: SO MOVED, COMMISSIONERS. THAT
25 MOTION PASSES UNANIMOUSLY 7-0, PLACING US UNDER

1 CONSIDERATION OF ITEMS PROPOSED FOR CONTINUANCE AT THE
2 TIME OF ISSUANCE, AND CURRENTLY THERE ARE NO ITEMS
3 PROPOSED FOR CONTINUANCE.

4 SO, WE CAN MOVE ON TO THE REGULAR CALENDAR FOR
5 ITEM 7, CASE NO. 2019-016230-ENV, THE HOUSING ELEMENT
6 2022 UPDATE.

7 COMMISSIONERS, THIS FOR YOUR REVIEW AND COMMENT.
8 PLEASE NOTE THAT PUBLIC COMMENT FOR THIS DRAFT
9 ENVIRONMENTAL IMPACT REPORT IS FROM APRIL 20TH, 2022
10 TIL 5:00 P.M. ON JUNE 20TH, 2022. THE DRAFT EIR IS
11 SCHEDULED FOR REVIEW AND COMMENT FOR THE PUBLIC AT THE
12 PLANNING COMMISSION ON JUNE 9TH, 2022.

13 ALLISON VANDERSLICE: LISA GIBSON, WHO IS
14 REMOTELY, HAS A FEW INTRODUCTORY REMARKS SHE WOULD LIKE
15 TO MAKE.

16 LISA GIBSON: CAN YOU HEAR ME?

17 JONAS IONIN: WE CAN.

18 LISA GIBSON: ALL RIGHT.

19 PRESIDENT MATSUDA, MEMBERS OF THE COMMISSION, I
20 AM LISA GIBSON, ENVIRONMENTAL REVIEW OFFICER FOR THE
21 CITY AND COUNTY OF SAN FRANCISCO.

22 I'D LIKE TO BRIEFLY INTRODUCE THIS ITEM WHICH IS
23 THE DRAFT ENVIRONMENTAL IMPACT REPORT OR DRAFT EIR FOR
24 THE HOUSING ELEMENT 2022 UPDATE.

25 TODAY WE ARE HERE TO ALLOW THE COMMISSION TO

1 CONSIDER YOUR COMMENTS ON THE DRAFT EIR, A HEARING TO
2 RECEIVE PUBLIC COMMENT ON THE DRAFT EIR IS SCHEDULED AT
3 THE PLANNING COMMISSION ON JUNE 9TH, 2022, AS JONAS HAS
4 ALREADY NOTED.

5 THE PLANNING DEPARTMENT PUBLISHED THE DRAFT EIR
6 ON APRIL 20TH, 2022. THE PURPOSE OF THIS DOCUMENT IS TO
7 INFORM GOVERNMENT DECISION MAKERS AND THE PUBLIC ABOUT
8 THE POTENTIAL ENVIRONMENTAL IMPACTS OF THE PROPOSED
9 HOUSING ELEMENT 2022 UPDATE AND TO IDENTIFY MITIGATION
10 MEASURES AND ALTERNATIVES THAT WOULD PREVENT SIGNIFICANT
11 AND AVOIDABLE ENVIRONMENTAL DAMAGE.

12 THE DOCUMENT IS THE CULMINATION OF OVER
13 TWO YEARS OF ANALYSIS CONDUCTED BY PLANNING DEPARTMENT
14 STAFF WITH THE ASSISTANCE OF OTHER SAN FRANCISCO
15 AGENCIES, INCLUDING THE CITY ATTORNEY'S OFFICE AND A
16 TEAM OF ENVIRONMENTAL CONSULTANTS.

17 SPECIFICALLY, THE INFORMATION WE BRING YOU TODAY
18 REFLECTS THE OUTSTANDING WORK OF THE PLANNING
19 DEPARTMENT'S ENVIRONMENTAL REVIEW TEAM, WHICH INCLUDES
20 ALLISON VANDERSLICE, ALANA CALLAGY, LIZ WHITE, CHRIS
21 KERN, JUSTIN GREVING, MAGGIE SMITH, SALLY MORGAN, KARI
22 HERVEY-LENTZ AND THE CITYWIDE SURVEY TEAM.

23 ALSO, THE COMMUNITY EQUITY TEAM WITH MAIA SMALL
24 AND SHELLEY CALTAGIRONE. AND THEN THE ENVIRONMENTAL
25 CONSULTANT TEAM AT ICF, INCLUDING JON RUSCH, JESSICA

1 VIRAMONTES, AND JENNY WILDT.

2 THE PLANNING DEPARTMENT DISTRIBUTED COPIES OF
3 THE DRAFT EIR, INCLUDING ELECTRONIC COPIES TO THIS
4 COMMISSION, AND A HARDCOPY TO THE STATE HISTORIC
5 PRESERVATION OFFICER.

6 AS NOTED, THE PUBLIC REVIEW PERIOD FOR THE DRAFT
7 EIR PERIOD BEGAN ON APRIL 20TH. I WOULD LIKE TO CORRECT
8 THE RECORD THAT IT WILL CONTINUE UNTIL 5:00 P.M. ON
9 JUNE 21ST, 2022. THAT IS BECAUSE JUNE 20TH IS
10 JUNETEENTH, AND AS A RESULT THE COMMENT PERIOD WILL
11 CLOSE ON THE FOLLOWING BUSINESS DAY, WHICH IS JUNE 21ST,
12 2022.

13 THE FINAL POINT I WILL MAKE IS THAT THIS
14 DOCUMENT IS A PROGRAMMATIC EIR. IT WILL BE USED IN THE
15 FUTURE TO STREAMLINE ENVIRONMENTAL REVIEW FOR
16 IMPLEMENTATION MEASURES SUCH AS REZONING ACTIONS AND
17 ESTABLISHMENT OF HOUSING SUSTAINABILITY DISTRICTS AND
18 PROJECTS CONSISTENT WITH THE HOUSING ELEMENT.

19 WITH THAT I WILL TURN THINGS OVER TO ALLISON
20 VANDERSLICE, PRINCIPAL PLANNER WITH THE PLANNING
21 DEPARTMENT FOR HER PRESENTATION ON THE DRAFT EIR
22 HISTORIC RESOURCES ANALYSIS. THANK YOU.

23 ALLISON VANDERSLICE: THANK YOU, LISA.

24 GOOD AFTERNOON, HPC COMMISSIONERS. ALLISON
25 VANDERSLICE, PLANNING DEPARTMENT STAFF.

1 AS ENVIRONMENTAL REVIEW OFFICER LISA GIBSON
2 NOTED, THE ITEM BEFORE YOU IS REVIEW AND COMMENT ON THE
3 DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE HOUSING
4 ELEMENT 2022 UPDATE.

5 PURSUANT TO SAN FRANCISCO'S LOCAL PROCEDURES FOR
6 IMPLEMENTING THE CALIFORNIA ENVIRONMENTAL QUALITY ACT OR
7 CEQA, WE ARE BRINGING THIS DRAFT EIR TO YOU BECAUSE THE
8 PROPOSED ACTION WOULD HAVE A SIGNIFICANT IMPACT ON
9 HISTORICAL RESOURCES.

10 COMMISSIONER MEMBERS WERE SENT ELECTRONIC COPIES
11 OF THE DRAFT EIR AS LISA MENTIONED, WHICH INCLUDES A
12 CULTURAL RESOURCE SECTION IN VOLUME 1, A PRESERVATION
13 ALTERNATIVE IN THE ALTERNATIVES SECTION IN VOLUME 2, AND
14 AS AN APPENDIX F, CULTURAL RESOURCE BACKGROUND
15 MATERIALS.

16 TODAY THE DEPARTMENT IS REQUESTING YOUR COMMENTS
17 ON THE ADEQUACY OF THE EIR REGARDING HISTORICAL
18 RESOURCES, SPECIFICALLY THE IDENTIFICATION OF HISTORIC
19 RESOURCES, THE ANALYSIS OF IMPACTS ON HISTORIC
20 RESOURCES, THE MITIGATION MEASURES, AND THE PRESERVATION
21 ALTERNATIVE CONSIDERED.

22 COMMENTS WILL NOT BE RESPONDED TO TODAY, BUT
23 WILL BE RESPONDED TO IN THE RESPONSE TO COMMENTS
24 DOCUMENT.

25 I WOULD LIKE TO REMIND THE COMMISSION THAT THE

1 PRESERVATION ALTERNATIVE ALONG WITH AN OVERVIEW SUMMARY
2 OF THE HISTORIC RESOURCE ANALYSIS WAS PRESENTED TO THE
3 HPC ON OCTOBER 20TH, 2021, FOR YOUR REVIEW AND COMMENT.
4 THE HPC FOUND THE ALTERNATIVE TO BE ADEQUATE.

5 I AM JOINED TODAY BY AN ENVIRONMENTAL PLANNING
6 TEAM THAT MANAGES THE EIR, INCLUDING CHRIS KERN, WHO IS
7 ON REMOTELY, ALANA CALLAGY, AND FOR THE HOUSING ELEMENT
8 TEAM, SHELLEY CALTAGIRONE AND MAIA SMALL, WHO ARE ALSO
9 ON REMOTELY, AND JON RUSCH FROM ICF WHO DRAFTED THE
10 CULTURAL SECTION, WHO IS ALSO ON REMOTELY.

11 IN THE FOLLOWING PRESENTATION, I WILL BRIEFLY
12 SUMMARIZE THE HOUSING ELEMENT UPDATE AS IT RELATES MORE
13 SPECIFICALLY TO FRAMING THE EIR ANALYSIS. SHELLEY
14 PRESENTED THE POLICIES MOST RECENTLY TO THIS COMMISSION
15 ON APRIL 20TH.

16 I WILL THEN GIVE YOU A BRIEF OVERVIEW ON THE EIR
17 AND THE APPROACH. I WILL THEN DISCUSS THE BUILT-
18 ENVIRONMENT HISTORIC RESOURCE IDENTIFICATION AND IMPACT
19 ANALYSIS FOLLOWED BY AN OVERVIEW OF THE HISTORIC
20 RESOURCE MITIGATION MEASURES.

21 I WILL THEN BRIEFLY PRESENT THE ARCHEOLOGICAL
22 RESOURCES AND HUMAN REMAINS IMPACT ANALYSIS AND
23 MITIGATION MEASURES.

24 WHILE NOT COVERED IN THIS PRESENTATION, TRIBAL
25 CULTURAL RESOURCES ARE ALSO ANALYZED IN THEIR OWN

1 SECTION IN VOLUME I OF THE DRAFT EIR. I WILL THEN
2 PRESENT THE PRESERVATION ALTERNATIVE.

3 FINALLY, I WILL PROVIDE A QUICK OVERVIEW OF THE
4 COMMENTS FROM THIS COMMISSION DURING THE PRESERVATION
5 ALTERNATIVE HEARING LAST OCTOBER AND HOW THOSE HAVE BEEN
6 ADDRESSED IN THE DRAFT EIR.

7 I WILL THEN CONCLUDE WITH THE SCHEDULE AND NEXT
8 STEPS.

9 MOVING ON TO THE SUMMARY OF THE HOUSING ELEMENT
10 2022 UPDATE, THE HOUSING ELEMENT 2022 UPDATE IS AN
11 UPDATE TO THE 2014 HOUSING ELEMENT FOR THE GENERAL PLAN.
12 THE HOUSING ELEMENT UPDATE WOULD MODIFY THE POLICIES OF
13 THE CURRENT HOUSING ELEMENT.

14 THE HOUSING ELEMENT UPDATE IS SAN FRANCISCO'S
15 FIRST HOUSING PLAN THAT CENTERS ON RACIAL AND SOCIAL
16 EQUITY. IT INCLUDES POLICIES AND PROGRAMS THAT EXPRESS
17 THE CITY'S COLLECTIVE VISION AND VALUES FOR THE FUTURE
18 OF HOUSING IN SAN FRANCISCO.

19 THIS PLAN IDENTIFIES PRIORITIES FOR
20 DECISION MAKERS, GUIDES RESOURCE ALLOCATION FOR HOUSING
21 PROGRAMS AND SERVICES, AND DEFINES HOW AND WHERE THE
22 CITY SHOULD CREATE NEW HOMES FOR SAN FRANCISCANS AND FOR
23 THOSE WHO WANT TO CALL THE CITY HOME.

24 THE HOUSING ELEMENT UPDATE IS REQUIRED BY STATE
25 LAW TO PROMOTE THE DEVELOPMENT OF SUFFICIENT HOUSING

1 UNITS TO MEET THE TARGETS ASSIGNED TO SAN FRANCISCO
2 EVERY EIGHT YEARS.

3 IN COORDINATION WITH REGIONAL AND LOCAL
4 PROJECTIONS, THE HOUSING ELEMENT UPDATE POLICIES AND
5 ACTIONS WOULD PLAN TO ADD APPROXIMATELY 150,000 UNITS BY
6 2050. THIS IS ESTIMATED TO BE HIGHER THAN THE AMOUNT
7 THAT THE EXISTING 2014 HOUSING ELEMENT POLICIES IS
8 ANTICIPATED TO ACCOMMODATE WITHIN THE SAME TIMEFRAME.

9 FOR REFERENCE UNDER THE EXISTING 2014 HOUSING
10 ELEMENT, APPROXIMATELY 100,000 NEW HOMES WOULD BE ADDED
11 BY 2050.

12 THE HOUSING ELEMENT UPDATE ALONE DOESN'T INCLUDE
13 ANY SPECIFIC PLANNING CODE AMENDMENTS, ZONING CHANGES,
14 DEVELOPMENT PROJECTS, OR OTHER IMPLEMENTING MEASURES.
15 THE ADOPTION OF THE HOUSING ELEMENT UPDATE WOULD NOT IN
16 AND OF ITSELF AUTHORIZE ANY CHANGES TO ZONING OR OTHER
17 LAND USE REGULATIONS OR APPROVE ANY DEVELOPMENT
18 PROJECTS.

19 I WILL NOW PRESENT A GENERAL OVERVIEW ON THE
20 EIR.

21 AS THE HOUSING ELEMENT UPDATE WILL NOT AUTHORIZE
22 CHANGES TO ZONING, LAND USE REGULATIONS, OR APPROVE ANY
23 DEVELOPMENT PROJECT, THE HOUSING ELEMENT UPDATE WOULD
24 NOT RESULT IN ANY DIRECT PHYSICAL CHANGES TO THE
25 ENVIRONMENT.

1 INSTEAD, THE HOUSING ELEMENT UPDATE WOULD RESULT
2 IN REASONABLY FORESEEABLE CHANGES. SPECIFICALLY, THE
3 DEPARTMENT ASSUMES THAT ADOPTION OF THE HOUSING ELEMENT
4 UPDATE WOULD LEAD TO FUTURE ACTIONS SUCH AS PLANNING
5 CODE AMENDMENTS TO IDENTIFY HEIGHT LIMITS ALONG CERTAIN
6 TRANSIT CORRIDORS, AND TO MODIFY DENSITY CONTROLS IN
7 LOW-DENSITY AREAS, DESIGNATION OF HOUSING SUSTAINABILITY
8 DISTRICTS AND APPROVAL OF DEVELOPMENT PROJECTS CONSISTENT
9 WITH THE GOALS, POLICIES, AND ACTIONS OF THE HOUSING
10 ELEMENT UPDATE.

11 THE EIR ANALYZED THE REASONABLY FORESEEABLE
12 PHYSICAL ENVIRONMENTAL IMPACTS OF THESE FUTURE ACTIONS
13 THAT WOULD IMPLEMENT THE GOALS AND POLICIES OF THE
14 PROPOSED HOUSING ELEMENT UPDATE.

15 THE ANALYSIS IN THE EIR USED A PROJECTED FUTURE
16 CONDITION AS THE ENVIRONMENTAL BASELINE AGAINST WHICH
17 ENVIRONMENTAL IMPACTS WILL BE ASSESSED.

18 WHY IS THIS? BECAUSE THE PROPOSED ACTION WOULD
19 BE IMPLEMENTED GRADUALLY OVER YEARS AND WOULD BE
20 ADDITIVE TO THE EXISTING POLICIES IMPLEMENTED UNDER THE
21 2014 HOUSING ELEMENT, THIS EIR USES FUTURE BASELINE
22 RATHER THAN CURRENT CONDITION.

23 THE 2050 ENVIRONMENTAL BASELINE IS BEING USED
24 BECAUSE IT WAS DETERMINED THAT AN ANALYSIS BASED ON
25 EXISTING CONDITIONS WOULD BE LESS INFORMATIVE AND

1 POTENTIALLY MISLEADING TO DECISION MAKERS AND THE
2 PUBLIC.

3 THE HOUSING ELEMENT EIR ANALYZES A 2050
4 ENVIRONMENTAL BASELINE THAT ASSUMES A CONTINUATION OF
5 2014 HOUSING ELEMENT POLICIES AND PLANS.

6 THE RESULT IS THAT THE ANALYSIS OF THE
7 ENVIRONMENTAL IMPACTS IN THE EIR IS BASED ON A
8 COMPARISON OF GROWTH UNDER THE 2014 HOUSING ELEMENT IN
9 2050 TO GROWTH UNDER THE PROPOSED HOUSING ELEMENT 2022
10 UPDATE IN 2050. I WILL DISCUSS THIS IN MORE DETAIL
11 SHORTLY.

12 THE PROPOSED DRAFT POLICIES OF THE 2022 HOUSING
13 ELEMENT UPDATE SEEK TO CHANGE THE GEOGRAPHIC
14 DISTRIBUTION OF WHERE HOUSING GROWTH WOULD OTHERWISE
15 OCCUR IN THE CITY UNDER EXISTING POLICIES IN ALIGNMENT
16 WITH STATE REQUIREMENTS.

17 BASED ON COMMUNITY OUTREACH, SAN FRANCISCO
18 PLANNING'S COMMUNITY EQUITY TEAM UNDERTOOK MODELING OF
19 THE CITY TO REIMAGINE THE FUTURE OF HOUSING IN
20 SAN FRANCISCO OVER THE NEXT 30 YEARS TO MEET THESE
21 GOALS.

22 THE HOUSING ELEMENT UPDATE ENDEAVORS TO SHIFT AN
23 INCREASED SHARE OF THE CITY'S FUTURE HOUSING GROWTH TO
24 TRANSIT CORRIDORS AND LOW-DENSITY RESIDENTIAL DISTRICTS
25 WITHIN WELL-RESOURCED AREAS, WHICH ARE PRIMARILY IN THE

1 WEST AND NORTH PARTS OF SAN FRANCISCO.

2 AS SHOWN HERE, THE PROPOSED ACTION RECOMMENDS
3 PROMOTING SMALL AND MID-RISE MULTIFAMILY DEVELOPMENT
4 THROUGH HEIGHT INCREASES ALONG CERTAIN TRANSIT CORRIDORS
5 AND THROUGH MODIFYING DENSITY LIMITS IN LOW-DENSITY
6 AREAS AS SHOWN IN YELLOW.

7 THE PLANNING DEPARTMENT CONDUCTED MODELING TO
8 UNDERSTAND HOW UPDATING THE HOUSING ELEMENT WOULD CHANGE
9 ANTICIPATED HOUSING GROWTH PATTERNS IN SAN FRANCISCO.

10 THIS MAP SHOWS IN YELLOW THE PROJECTED GROWTH
11 AND HOUSING UNITS BETWEEN 2020 AND 2050 UNDER THE
12 EXISTING HOUSING ELEMENT, OR THE 2050 ENVIRONMENTAL
13 BASELINE AS DESCRIBED IN THE HOUSING ELEMENT EIR.

14 UNDER THE 2050 ENVIRONMENTAL BASELINE, THE
15 MAJORITY OF ANTICIPATED UNITS ARE PROJECTED TO OCCUR IN
16 THE EASTERN HALF OF THE CITY. MANY OF THESE UNITS ARE
17 PART OF PIPELINE PROJECTS, ARE HOUSING PROJECTS THAT ARE
18 UNDER CONSTRUCTION, HAVE APPROVED OR IN PROGRESS
19 BUILDING PERMITS, HAVE ENTITLEMENTS OR ARE CURRENTLY
20 UNDERGOING REVIEW AT THE PLANNING DEPARTMENT.

21 EXAMPLES OF LARGER PIPELINE PROJECTS ARE POTRERO
22 POWER STATION, MISSION ROCK, AND BALBOA RESERVOIR.

23 THIS MAP SHOWS IN ORANGE THE PROJECTED GROWTH
24 AND HOUSING UNITS BETWEEN 2020 AND 2050 UNDER THE
25 HOUSING ELEMENT 2022 UPDATE, WHICH IS THE 2050 PROPOSED

1 ACTION.

2 THE HOUSING ELEMENT 2022 UPDATE ASSUMES
3 APPROXIMATELY 50,000 MORE HOUSING UNITS IN SAN FRANCISCO
4 IN 2050 THAN THE 2050 ENVIRONMENTAL BASELINE.

5 YOU WILL SEE THERE CONTINUES TO BE GROWTH IN THE
6 EASTERN PART OF THE CITY, BUT THERE IS MORE GROWTH
7 PROJECTED IN THE NORTHERN AND WESTERN PARTS OF THE CITY.

8 UNDER THE 2050 BASELINE, APPROXIMATELY 100,000
9 UNITS ARE PROJECTED TO OCCUR IN SAN FRANCISCO. UNDER
10 THE 2050 PROPOSED ACTION, APPROXIMATELY 150,000 HOUSING
11 UNITS ARE PROJECTED TO OCCUR.

12 AS SHOWN IN THIS DIAGRAM, THE COMMONALITY
13 BETWEEN THESE TWO GROWTH PATTERNS IS THE PIPELINE
14 PROJECTS.

15 THIS MAP SHOWS THE ANTICIPATED CHANGE BETWEEN
16 THE 2050 PROPOSED ACTION IN WHICH THE HOUSING ELEMENT IS
17 UPDATED AND THE 2050 ENVIRONMENTAL BASELINE.

18 IN GENERAL, AS SHOWN HERE IN ORANGE, FUTURE
19 ACTIONS ASSOCIATED WITH THE PROPOSED HOUSING ELEMENT
20 UPDATE WOULD SHIFT AN INCREASE SHARE OF THE CITY'S
21 FUTURE HOUSING GROWTH TO TRANSIT CORRIDORS AND
22 LOW-DENSITY RESIDENTIAL DISTRICTS WITHIN WELL-RESOURCED
23 AREAS, PRIMARILY IN THE WEST AND NORTH PARTS OF THE
24 CITY.

25 NOW THAT I HAVE GIVEN YOU A QUICK OVERVIEW ON

1 THE EIR APPROACH AND THE PROPOSED ACTION, I WILL MOVE ON
2 TO A DISCUSSION OF THE BUILT-ENVIRONMENT HISTORIC
3 RESOURCES ANALYSIS PRESENTED IN THE DRAFT EIR.

4 THE ANALYSIS FOR THE BUILT-ENVIRONMENT HISTORIC
5 RESOURCES TOOK INTO CONSIDERATION ALL CURRENTLY KNOWN
6 BUILT-ENVIRONMENT HISTORIC RESOURCES AS IDENTIFIED FOR
7 THE PURPOSE OF CEQA REVIEW.

8 PARCELS WITH KNOWN RESOURCES ARE SHOWN IN GREEN.
9 THIS INCLUDES ARTICLE 10 AND 11 PROPERTIES AND
10 DISTRICTS, NATIONAL AND CALIFORNIA REGISTERED LISTED
11 INDIVIDUAL PROPERTIES AND DISTRICTS, NATIONAL AND
12 CALIFORNIA REGISTER ELIGIBLE INDIVIDUAL PROPERTIES AND
13 DISTRICTS AS WELL AS OTHER PROPERTIES THAT QUALIFY AS
14 HISTORICAL RESOURCES FOR THE PURPOSES OF CEQA REVIEW.

15 AFTER CHARACTERIZING THE IDENTIFIED
16 BUILT-ENVIRONMENT HISTORIC RESOURCES THAT ARE KNOWN AS
17 OF 2021, THE EIR PROVIDES A 2050 BUILT-ENVIRONMENT
18 HISTORIC RESOURCE FORECAST THAT AIMS TO ANTICIPATE HOW
19 SAN FRANCISCO'S BUILT-ENVIRONMENT HISTORIC RESOURCES
20 WILL EVOLVE OVER THE LIFESPAN OF THE HOUSING ELEMENT
21 UPDATE POLICIES THROUGH 2050.

22 THE FORECAST IS PRESENTED IN TERMS OF THE
23 PERCENTAGE OF PARCELS LIKELY TO CONTAIN HISTORIC
24 RESOURCES BY 2050 BY NEIGHBORHOOD, WHICH IS SHOWN AS A
25 GRADIENT ON THE MAP ON THIS SLIDE.

1 THE 2050 FORECAST IS BASED ON CURRENTLY KNOWN
2 HISTORIC RESOURCES, THE PERCENTAGE OF EVALUATED AND
3 UNEVALUATED PARCELS IN A NEIGHBORHOOD, CULTURAL
4 DISTRICTS AND CULTURAL ENCLAVES IDENTIFIED AND HISTORIC
5 CONTEXT STATEMENTS.

6 AS SUPPORT FOR THIS FORECAST, THE HISTORIC
7 RESOURCE ANALYSIS AND THE DRAFT EIR PROVIDES A ROBUST
8 OVERVIEW OF THE LARGE BODY OF WORK THAT THE DEPARTMENT
9 USES TO IDENTIFY HISTORIC RESOURCES SUCH AS AN OVERVIEW
10 OF HISTORIC CONTEXT STATEMENTS.

11 THE EIR ALSO EXPLAINS THE DEPARTMENT'S HISTORIC
12 RESOURCE IDENTIFICATION PROCESS, INCLUDING A SUMMARY OF
13 THE SF SURVEY AND PROJECT REVIEW UNDER CEQA.

14 THE DEPARTMENT'S PROJECTION OF FUTURE HOUSING
15 UNITS, WHICH REPRESENTS THE LIKELIHOOD AND PATTERN OF
16 DEVELOPMENT UNDER THE HOUSING ELEMENT UPDATE, TAKES INTO
17 ACCOUNT THE PRESENCE OF INDIVIDUALLY BUILT ENVIRONMENTAL
18 HISTORIC RESOURCES AND HISTORIC DISTRICTS IDENTIFIED AS
19 OF 2021.

20 THIS MAP SHOWS THE LOCATION OF PREVIOUSLY
21 IDENTIFIED HISTORIC RESOURCES AND HISTORIC DISTRICTS,
22 SHOWN IN PURPLE, AND THE PROJECTED DIFFERENCE IN HOUSING
23 UNIT GROWTH AND DISTRIBUTION BETWEEN THE 2050
24 ENVIRONMENTAL BASELINE AND THE PROPOSED ACTION WHICH IS
25 SHOWN IN ORANGE.

1 AS YOU CAN SEE, THE MAJORITY OF KNOWN HISTORIC
2 RESOURCES ARE OUTSIDE OF THE AREA WHERE THE HOUSING
3 ELEMENT UPDATE WOULD SHIFT NEW DEVELOPMENT AND IN CONTRAST
4 TO THE 2050 ENVIRONMENTAL BASELINE.

5 THE HOUSING ELEMENT UPDATE WOULD ENCOURAGE
6 FUTURE HOUSING IN BALANCE WITH THE RECOGNITION AND
7 PRESERVATION OF SAN FRANCISCO'S CULTURAL HERITAGE. AS
8 DISCUSSED IN PREVIOUS PRESENTATIONS, THE HOUSING ELEMENT
9 UPDATE INCLUDES POLICIES THAT PROMOTE AND CELEBRATE
10 CULTURAL HERITAGE.

11 IN REGARD TO BUILT-ENVIRONMENT HISTORIC
12 RESOURCES, GOAL 5, AND SPECIFICALLY DRAFT POLICY 37, CALL
13 FOR SUPPORTING CULTURAL USES ACTIVITIES AND ARCHITECTURE
14 THAT SUSTAINS SAN FRANCISCO'S DYNAMIC AND UNIQUE
15 CULTURAL HERITAGE.

16 THE HOUSING ELEMENT UPDATE POLICIES ARE NOT
17 PRESCRIPTIVE AND PROVIDE ONLY GENERAL PARAMETERS FOR THE
18 DESIRED FORM AND DENSITY OF FUTURE DEVELOPMENT.

19 INDIVIDUAL RESOURCES OR DISTRICT CONTRIBUTORS
20 COULD BE DEMOLISHED TO ACCOMMODATE NEW HOUSING. IN
21 OTHER INSTANCES, EXISTING BUILDINGS COULD BE
22 SUBSTANTIALLY ALTERED THROUGH REHABILITATION OR
23 ADDITIONS.

24 OTHER FUTURE HOUSING PROJECTS MAY ALSO PROPOSE
25 INFILL CONSTRUCTION WITHIN HISTORIC DISTRICTS OR

1 ADJACENT TO INDIVIDUAL RESOURCES, WHICH COULD DEGRADE A
2 DISTRICT'S CONTINUITY OR AN INDIVIDUAL RESOURCE'S
3 SETTING.

4 IT IS ALSO POSSIBLE THAT SOME FUTURE DEVELOPMENT
5 WOULD AIM TO PRODUCE ADDITIONAL HOUSING UNITS WHILE
6 SENSITIVELY PRESERVING OR RESTORING THE CHARACTER-
7 DEFINING FEATURES OF BUILT-ENVIRONMENT HISTORIC
8 RESOURCES.

9 THE HOUSING ELEMENT UPDATE DOES NOT STRICTLY
10 MANDATE THAT ALL FUTURE HOUSING CONSTRUCTION MUST
11 PRESERVE HISTORIC RESOURCES IN A MANNER THAT WOULD AVOID
12 SIGNIFICANT IMPACTS.

13 IT IS THEREFORE REASONABLE TO ASSUME THAT SOME
14 FUTURE HOUSING PROJECTS WOULD DEMOLISH OR ALTER HISTORIC
15 RESOURCES TO CONSTRUCT DENSER FORMS OF HOUSING, WHICH IS
16 CONSISTENT WITH THE HOUSING UNIT PRODUCTION GOALS OF THE
17 PROPOSED ACTION.

18 BECAUSE DEMOLITION OR SUBSTANTIAL ALTERATION
19 THAT WOULD RESULT IN MATERIAL IMPAIRMENT OF HISTORIC
20 RESOURCES MAY OCCUR IN NEIGHBORHOODS WHERE THE HOUSING
21 ELEMENT UPDATE WOULD SHIFT NEW DEVELOPMENT IN CONTRAST
22 TO THE 2050 ENVIRONMENTAL BASELINE, THE EIR ANALYSIS
23 DETERMINED THAT THE PROPOSED ACTION WOULD RESULT IN A
24 SIGNIFICANT ADVERSE EFFECT TO BUILT-ENVIRONMENT HISTORIC
25 RESOURCES.

1 THEREFORE, THE EIR IDENTIFIED A SIGNIFICANT AND
2 UNAVOIDABLE IMPACT TO BUILT-ENVIRONMENT HISTORIC
3 RESOURCES.

4 I WILL NOW BRIEFLY REVIEW THE BUILT-ENVIRONMENT
5 MITIGATION MEASURES.

6 THE HOUSING ELEMENT 2022 UPDATE EIR INCLUDES A
7 BROAD RANGE OF BUILT-ENVIRONMENT HISTORIC RESOURCE
8 MITIGATION MEASURES DESIGNED TO LESSEN THE SIGNIFICANT
9 IMPACTS OF THE PROPOSED ACTION.

10 THE GOAL IS TO HAVE A WIDE-RANGE OF MITIGATION
11 MEASURES THAT COULD BE SELECTIVELY IMPLEMENTED BASED ON
12 THE TYPE OF HISTORIC RESOURCE AND THE PROPOSED PROJECT
13 IMPACT TO THAT RESOURCE.

14 THESE MITIGATION MEASURES ARE GEARED TOWARDS
15 MAKING MODIFICATIONS TO PROJECTS TO REDUCE IMPACTS TO
16 HISTORIC RESOURCES, EITHER THROUGH A PROCESS SIMILAR TO
17 DEVELOPING ALTERNATIVES OR THROUGH IMPLEMENTING
18 RELOCATION AND SALVAGE PROGRAMS.

19 DOCUMENTATION MITIGATION MEASURES INCLUDE THE
20 TRADITIONAL PREPARATION OF HABS/HALS-LIKE DRAWINGS AND
21 PHOTOGRAPHS ALONG WITH VIDEO DOCUMENTATION AND OTHER
22 DIGITAL DOCUMENTATION TYPES.

23 INTERPRETATION MITIGATION MEASURES RANGE FROM
24 THE PREPARATION OF PERMANENT ON-SITE DISPLAYS THAT MAY
25 INCLUDE COMMUNITY ARTWORK, AND MAY BE INFORMED BY ORAL

1 HISTORY, TO THE DEVELOPMENT OF EVENTS, LIKE WALKING TOURS
2 OR COMMUNITY MEMORIALS.

3 THE BUILT-ENVIRONMENT MITIGATION MEASURES
4 INCLUDE COORDINATION WITH THE CITYWIDE SURVEY AS
5 RELEVANT.

6 THIS SUITE OF MITIGATION MEASURES WOULD REDUCE
7 IMPACTS TO BUILT-ENVIRONMENT HISTORIC RESOURCES BUT NOT
8 TO A LESS-THAN-SIGNIFICANT LEVEL. THEREFORE, THE EIR
9 FOUND THAT IMPACTS TO HISTORIC RESOURCES WOULD BE
10 SIGNIFICANT AND UNAVOIDABLE WITH MITIGATION.

11 I WILL NOW MOVE ON TO ARCHEOLOGICAL RESOURCES
12 AND HUMAN REMAINS, WHICH MAY BE CONSIDERED HISTORIC
13 RESOURCES PURSUANT TO CEQA.

14 SOIL DISTURBANCE ASSOCIATED WITH THE
15 CONSTRUCTION OF FUTURE DEVELOPMENT CONSISTENT WITH THE
16 HOUSING ELEMENT UPDATE HAS THE POTENTIAL TO DISTURB
17 ARCHEOLOGICAL RESOURCES AND HUMAN REMAINS.

18 THE POTENTIAL FOR IMPACTS TO OCCUR WOULD BE
19 EXPECTED BE HIGHER IN AREAS OF ELEVATED SENSITIVITY FOR
20 ARCHEOLOGICAL RESOURCES AND HUMAN REMAINS AND WOULD
21 VARY WITH THE LOCATION AND DENSITY OF DEVELOPMENT AND
22 THE VOLUME AND DEPTH OF SOIL EXCAVATION AT PARTICULAR
23 PROJECT SITES. THE DRAFT EIR OUTLINES ARCHEOLOGICAL
24 SENSITIVITY BY PLANNING DISTRICT.

25 THE ANALYSIS IN THE DRAFT EIR THEN COMPARES THE

1 PROJECTED GEOGRAPHIC DISTRIBUTION AND DENSITY OF FUTURE
2 DEVELOPMENT CONSISTENT WITH THE PROPOSED ACTION TO THE
3 2050 ENVIRONMENTAL BASELINE IN RELATIONSHIP TO
4 ARCHEOLOGICAL SENSITIVITY.

5 BASED ON THIS ANALYSIS, THE DRAFT EIR IDENTIFIES
6 SIGNIFICANT IMPACTS TO ARCHEOLOGICAL RESOURCES AND
7 HUMAN REMAINS.

8 MITIGATION MEASURES IDENTIFIED IN THE DRAFT EIR
9 INCLUDE ARCHEOLOGICAL PROTECTION PLANS, ARCHEOLOGICAL
10 INVESTIGATION TO RECOVER DATA THAT WOULD BE LOST THROUGH
11 FUTURE DEVELOPMENT, PUBLIC INTERPRETATION PROGRAMS,
12 CURATION OF CULTURAL MATERIAL, AND COORDINATION WITH
13 NATIVE AMERICAN REPRESENTATIVES AND OTHER DESCENDANT
14 GROUPS.

15 THEREFORE, THE DRAFT EIR FINDS THE IMPACTS TO
16 ARCHEOLOGICAL RESOURCES AND HUMAN REMAINS WOULD BE LESS
17 THAN SIGNIFICANT WITH MITIGATION.

18 I WILL NOW MOVE ON TO DISCUSSING THE
19 ALTERNATIVES IN THE DRAFT EIR.

20 AN EIR REQUIRES A REASONABLE RANGE OF
21 ALTERNATIVES THAT MEET MOST PROJECT OBJECTIVES AND
22 REDUCE SIGNIFICANT IMPACTS.

23 THE ALTERNATIVES STUDIED IN THIS EIR INCLUDE THE
24 FOLLOWING: THE NO PROJECT ALTERNATIVE, WHICH ASSUMES
25 HOUSING DEVELOPMENT WOULD CONTINUE TO OCCUR IN

1 SAN FRANCISCO UNDER THE GOALS, POLICIES, AND IMPLEMENTING
2 MEASURES OF THE EXISTING 2014 HOUSING ELEMENT.

3 THE EAST SIDE ALTERNATIVE, WHICH INCLUDES
4 POLICIES THAT WOULD CONTINUE THE EXISTING DEVELOPMENT
5 PATTERNS IN THE CITY, WHICH FOCUSES DEVELOPMENT ON THE
6 EAST SIDE.

7 THE PRESERVATION ALTERNATIVE, WHICH I WILL
8 DISCUSS IN MORE DETAIL SHORTLY.

9 AND THE DISPERSED GROWTH ALTERNATIVE, WHICH
10 INCLUDES POLICIES THAT WOULD DIRECT GROWTH TO
11 WELL-RESOURCED NEIGHBORHOODS MOSTLY WITHIN LOW-DENSITY
12 NEIGHBORHOODS, FOCUSING ONLY ON SMALL MULTIFAMILY
13 BUILDINGS AND WOULD NOT INCLUDE HEIGHT CHANGES.

14 IN ADDITION, THE DRAFT EIR INCLUDES ANALYSIS OF
15 PLAN BAY AREA 2050, WHICH IS THE LONG-RANGE, INTEGRATED
16 TRANSPORTATION AND LAND-USE HOUSING STRATEGY THROUGH
17 2050 FOR THE SAN FRANCISCO BAY AREA.

18 I WILL NOW MOVE ON TO THE PRESERVATION
19 ALTERNATIVE IN MORE DETAIL.

20 THE AIM OF THE PRESERVATION ALTERNATIVE IS TO
21 REDUCE SIGNIFICANT IMPACTS TO BUILT-ENVIRONMENT HISTORIC
22 RESOURCES WHILE STILL MEETING MOST OF THE HOUSING
23 ELEMENT UPDATE GOALS.

24 THE PRESERVATION ALTERNATIVE DIRECTS A GREATER
25 PORTION OF HOUSING DEVELOPMENT AWAY FROM PARCELS WITH

1 EXISTING BUILT-ENVIRONMENT HISTORIC RESOURCES
2 COMPARED TO THE PROPOSED ACTION.

3 TO ACCOMPLISH THIS, THE PRESERVATION ALTERNATIVE
4 IDENTIFIES AND REVISES SOME HOUSING ELEMENT UPDATE DRAFT
5 POLICIES THAT FOCUS SPECIFICALLY ON DIRECTING PHYSICAL
6 DEVELOPMENT THAT COULD IMPACT BUILT-ENVIRONMENT HISTORIC
7 RESOURCES.

8 THE HOUSING ELEMENT UPDATE DRAFT POLICIES
9 REVISED UNDER THE PRESERVATION ALTERNATIVE AIM TO
10 PRESERVE BUILT-ENVIRONMENT HISTORIC RESOURCES BY
11 PROTECTING PARCELS WITH INDIVIDUAL RESOURCES FROM
12 DEMOLITION, PROMOTING THE USE OF THE SECRETARY OF THE
13 INTERIOR STANDARDS FOR REHABILITATION, THE DEVELOPMENT
14 OF PARCELS WITH BUILT-ENVIRONMENT HISTORIC RESOURCES,
15 AND PROMOTING DEVELOPMENT IN HISTORIC DISTRICTS TO BE
16 COMPATIBLE WITH THOSE HISTORIC DISTRICTS.

17 THE HOUSING ELEMENT UPDATE EIR DETERMINES THAT
18 WHILE THE PRESERVATION ALTERNATIVE WOULD REDUCE IMPACTS
19 TO BUILT-ENVIRONMENT HISTORIC RESOURCES, THE
20 ALTERNATIVE WOULD STILL HAVE SIGNIFICANT AND UNAVOIDABLE
21 IMPACTS TO BUILT-ENVIRONMENT HISTORIC RESOURCES.

22 TO ALIGN WITH THE OBJECTIVES OF THE PROPOSED
23 ACTION AND REDUCE IMPACTS ON BUILT-ENVIRONMENT HISTORIC
24 RESOURCES, THE PRESERVATION ALTERNATIVE REDISTRIBUTES
25 UNITS WITHIN THE WELL-RESOURCED AREAS TO PLANNING

1 DISTRICTS WITH THE POTENTIAL TO ACCOMMODATE FUTURE
2 DEVELOPMENT WITHOUT RESULTING IN SIGNIFICANT IMPACTS ON
3 HISTORIC RESOURCES.

4 THIS ANALYSIS PRIMARILY RELIED UPON THE 2050
5 HISTORIC RESOURCE FORECAST AND A NEIGHBORHOOD HISTORIC
6 RESOURCE PATTERN ANALYSIS. UNDERSTANDING THE MAGNITUDE
7 OF THE BUILT-ENVIRONMENT HISTORIC RESOURCES
8 ANTICIPATED BY NEIGHBORHOOD GUIDED THE REFINEMENT OF
9 THE HOUSING ELEMENT UPDATE INTO THE PRESERVATION
10 ALTERNATIVE.

11 THIS MAP SHOWS THE PROJECTED DIFFERENCE IN THE
12 HOUSING UNIT GROWTH AND DISTRIBUTION BY PLANNING
13 DISTRICT UNDER THE PRESERVATION ALTERNATIVE COMPARED TO
14 THE 2050 ENVIRONMENTAL BASELINE.

15 FOR EXAMPLE, THE MARINA AND WESTERN ADDITION
16 NEIGHBORHOODS HAVE RELATIVELY HIGHER CONCENTRATIONS OF
17 BUILT-ENVIRONMENT HISTORIC RESOURCES COMPARED TO OTHER
18 NEIGHBORHOODS IN THE WELL-RESOURCED AREAS OF THE CITY;
19 AND THEREFORE, LESS HOUSING GROWTH WAS PROJECTED IN
20 THOSE NEIGHBORHOODS UNDER THE PRESERVATION ALTERNATIVE
21 THAN UNDER THE PROPOSED ACTION.

22 FINALLY, I WANT TO END BY SUMMARIZING SOME OF
23 THE PREVIOUS COMMENTS WE HEARD FROM THIS COMMISSION
24 ABOUT THE HOUSING ELEMENT EIR AND BRIEFLY RESPOND TO
25 THEM.

1 AS PREVIOUSLY STATED, THE DRAFT PRESERVATION
2 ALTERNATIVE WAS BROUGHT TO THIS COMMISSION LAST FALL AND
3 GENERALLY THE COMMISSION FOUND THAT THE PRESERVATION
4 ALTERNATIVE IS WELL-THOUGHT OUT AND ACCURATE. THE
5 PRESERVATION ALTERNATIVE ANALYZED IN THE EIR IS BASED ON
6 THE ALTERNATIVE PRESENTED TO THIS COMMISSION.

7 CULTURAL DISTRICTS ARE INCLUDED IN THE OVERVIEW
8 OF THE DEPARTMENT'S PROCESS FOR HISTORIC RESOURCE
9 IDENTIFICATION, AND THE PRESENCE OF CULTURAL DISTRICTS
10 ARE A FACTOR IN THE 2050 HISTORIC RESOURCE FORECAST.

11 AS MENTIONED, THE DRAFT EIR INCLUDES A RANGE OF
12 HISTORIC RESOURCE MITIGATION MEASURES MANY OF WHICH
13 FOCUS ON PUBLIC INTERPRETATION AND INCLUDE COMMUNITY
14 ENGAGEMENT.

15 THE DEPARTMENT HAS INCLUDED THE COMPLETION OF
16 THE CITYWIDE SURVEY AS AN IMPLEMENTATION ACTION IN THE
17 HOUSING ELEMENT, SO IT IS NO LONGER INCLUDED AS A
18 SEPARATE MITIGATION MEASURE; HOWEVER, THE EIR EXPLAINS
19 HOW A CEQA PROJECT REVIEW WILL COORDINATE WITH SF SURVEY
20 AND THE MITIGATION MEASURES REQUIRE COORDINATION WITH SF
21 SURVEY AS RELEVANT.

22 TO CONCLUDE I WILL NOW SUMMARIZE NEXT STEPS.
23 THIS SLIDE SHOWS THE MAJOR MILESTONES FOR BOTH THE PLAN
24 AND THE EIR. THE PLAN WILL RETURN TO THIS COMMISSION
25 EARLY NEXT YEAR.

1 THE COMPLETED STEPS AND NEXT STEPS FOR THE EIR
2 ARE SHOWN HERE. THE REVIEW AND COMMENT ON THE DRAFT EIR
3 WILL BE AT THE PLANNING COMMISSION NEXT WEEK. THE
4 COMMENT PERIOD ON THE DRAFT EIR CLOSES ON JUNE 21ST.

5 THE EIR CERTIFICATION HEARING IS ANTICIPATED TO
6 BE EARLY NEXT YEAR.

7 BEFORE I CONCLUDE, I WOULD LIKE TO REMIND
8 EVERYONE THAT IN ORDER TO BE RESPONDED TO IN THE EIR,
9 COMMENTS ON THE DRAFT EIR MUST BE SUBMITTED ORALLY AT
10 THE PLANNING COMMISSION ON JUNE 9TH OR SUBMITTED IN
11 WRITING TO ELIZABETH WHITE AT THE ADDRESS OR EMAIL
12 ADDRESS SHOWN HERE.

13 COMMENTS MUST BE SUBMITTED BY 5:00 P.M. ON JUNE
14 21ST, 2022. COMMENTS MADE BY MEMBERS OF THE PUBLIC
15 DURING THIS HEARING WILL NOT BE RESPONDED TO IN THE
16 RESPONSE TO COMMENTS DOCUMENT.

17 AS A REMINDER, THE ITEM BEFORE YOU DOES NOT
18 REQUIRE AN APPROVAL ACTION, BUT IT'S AN OPPORTUNITY FOR
19 THE COMMISSIONERS TO PROVIDE THEIR COMMENTS REGARDING
20 THE ANALYSIS OF HISTORIC RESOURCES IN THE DRAFT EIR.

21 IN ADDITION, WE WILL FORWARD ANY HPC COMMENTS TO
22 THE PLANNING COMMISSION PRIOR TO THE DRAFT EIR HEARING
23 ON JUNE 9TH.

24 I AND THE TEAM ARE AVAILABLE FOR ANY CLARIFYING
25 QUESTIONS YOU MAY HAVE; HOWEVER, QUESTIONS AND COMMENTS

1 WILL PRIMARILY BE RESPONDED TO IN THE RESPONSE TO
2 COMMENTS DOCUMENT. THANK YOU FOR YOUR TIME.

3 PRESIDENT MATSUDA: THANK YOU.

4 JONAS IONIN: THANK YOU. THAT CONCLUDES STAFF
5 PRESENTATION. WE SHOULD OPEN UP PUBLIC COMMENT.
6 MEMBERS OF THE PUBLIC, THOSE THAT ARE IN THE CHAMBER,
7 PLEASE COME FORWARD AND LINE UP ON THE SCREEN SIDE OF
8 THE ROOM.

9 IF YOU ARE CALLING IN REMOTELY, YOU NEED TO A
10 PRESS *3.

11 GEORGIA SCHUTTISH: THANK YOU. THAT WAS VERY
12 INFORMATIVE. I DON'T REALLY HAVE A LOT TO SAY, BUT I
13 JUST STUMBLED ON SOMETHING, IF I CAN HAVE THE OVERHEAD
14 PLEASE.

15 SORRY. I SHOULD HAVE TURNED IT ON.

16 ALL RIGHTY. HELLO SFGOV.TV. OKAY.

17 SO THIS IS AN 'A' RATED HOUSE, OKAY. THIS IS ON
18 SOUTH VAN NESS, AND I JUST HAPPENED TO SEE A PLAN THAT
19 IS PROPOSED, AND THAT IS THE PROPOSAL.

20 SO, I DON'T KNOW IF THAT'S A TEMPLATE FOR WHAT'S
21 GOING TO HAPPEN OR WHAT COULD HAPPEN UNDER THIS PLAN,
22 BUT I JUST THOUGHT IT WAS INTERESTING. I'M NOT GOING TO
23 COMMENT ON IT. I HAVE AN OPINION, BUT I'LL KEEP IT TO
24 MYSELF. BUT I JUST THOUGHT PEOPLE SHOULD LOOK AT IT.
25 IT'S 1474 SOUTH VAN NESS. I THINK THE REVIEWS ARE JUST

1 STARTING.

2 THE OTHER THING I'D SAY IS I AM A BIG FAN OF
3 SECTION 317, AND I DON'T THINK IT'S EVER BEEN APPLIED
4 PROPERLY, THE DEMO CALCS. AND THINK THAT'S ONE WAY --
5 WHEN THAT WAS PUT IN, THE COMMISSIONERS THOUGHT THAT
6 WOULD HELP PRESERVE HOUSING AND PRESERVE RESOURCES OF A
7 HOUSE, AND I'M ALSO A BIG FAN OF THE BARREL-FRONT
8 MEDITERRANEAN REVIVAL HOUSES.

9 IT'S A VERY UNIQUE STYLE TO SAN FRANCISCO. MARY
10 BROWN DID HER STUDY. THERE'S A LOT OF THEM OUT IN THE
11 SUNSET; THEY ARE GROUPED TOGETHER. HER STUDY SAYS,
12 "SIGNIFICANCE IS DUALY DERIVED FROM THE OVERALL
13 ARCHITECTURAL EFFECT OF A GROUPING OF BARREL-FRONT
14 MEDITERRANEAN REVIVAL BUILDINGS."

15 AND THAT'S TRUE, BUT THEY ARE ALSO A BIG PART OF
16 THE INFILL HOUSING IN MANY OF THE EASTERN
17 NEIGHBORHOODS, AND THEY ARE ALSO -- YOU CAN SEE THEM
18 AROUND BERNAL HEIGHTS AND CERTAINLY ST. MARY'S PARK.

19 SO, I REALLY HOPE PEOPLE WILL CONSIDER THESE,
20 AND I JUST WANTED TO RAISE THAT ISSUE.

21 AND THAT'S IT. THANKS FOR ALL THE INFORMATION.

22 PRESIDENT MATSUDA: THANK YOU.

23 JONAS IONIN: OKAY. LAST CALL FOR PUBLIC
24 COMMENT ON THIS ITEM. YOU NEED TO PRESS *3 IF YOU ARE
25 CALLING REMOTELY. AGAIN, IF YOU ARE IN THE CHAMBERS,

1 PLEASE COME FORWARD.

2 SEEING NO ADDITIONAL REQUEST TO SPEAK,
3 COMMISSIONERS, PUBLIC COMMENT IS CLOSED, AND THIS MATTER
4 IS NOW BEFORE YOU.

5 PRESIDENT MATSUDA: GREAT, THANK YOU.

6 SO, THANK YOU VERY MUCH, ALLISON, FOR PROVIDING
7 US WITH A VERY, VERY DETAILS -- AND VERY, VERY EXTENSIVE
8 ANALYSIS ABOUT WHAT WE SHOULD BE FOCUSING ON TODAY IN
9 TERMS OF OUR COMMENTS AND TO BE SUBMITTED TO THE
10 PLANNING COMMISSION FOR THEIR NEXT HEARING; IS THAT
11 CORRECT? ON JUNE 9TH.

12 SO I OPEN IT TO THE COMMISSIONERS TO MAKE THEIR
13 COMMENTS AND SUGGESTIONS SO THAT WE CAN INCORPORATE IT
14 IN A DOCUMENT THAT THE STAFF WILL BE BUSY TO WORK ON,
15 RIGHT? FOR THE REMAINDER OF THIS WEEK AND EARLY NEXT
16 WEEK.

17 AND SO I DO SEE TWO COMMISSIONERS WHO WOULD LIKE
18 TO MAKE COMMENT, BUT WOULD YOU LIKE TO ADD ANY OTHER
19 INFORMATION BEFORE WE START TO SHARE OUR COMMENTS WITH
20 YOU?

21 ALLISON VANDERSLICE: NO. I'LL JUST CLARIFY
22 THAT THAT'S CORRECT. SO COMMENTS TODAY WILL BE RECORDED
23 IN A STAFF LETTER WHICH I WILL SEND TO COMMISSION
24 PRESIDENT MATSUDA FOR REVIEW AND THEN WE WILL SEND THAT
25 TO THE PLANNING COMMISSION PRIOR TO THEIR HEARING NEXT

1 WEEK, SO THAT CAN INFORM ANY COMMENTS THEY MIGHT HAVE.

2 PRESIDENT MATSUDA: GREAT. THANK YOU.

3 AND JUST TO REMIND THE COMMISSION, THIS WAS A
4 LOT OF WORK. A LOT. I MEAN, THIS DEFINITELY
5 INCORPORATES A LOT MORE THAN WHAT WE CONSIDER USUALLY AT
6 THE HPC. WHEN WE TALK ABOUT THE HOUSING ELEMENT, WE
7 TALK ABOUT A NUMBER OF DIFFERENT AREAS AS WELL.

8 BUT I CAN ASK ALL OF YOU AS WELL TO KEEP OUR
9 FOCUS IN ON HISTORIC RESOURCE AND THE ALTERNATIVES AND
10 THE MITIGATION MEASURES THAT WERE PRESENTED TODAY.

11 SO WITH THAT, COMMISSIONER FOLEY.

12 CHRIS FOLEY: THANK YOU, PRESIDENT MATSUDA.

13 I JUST WANT TO SAY TO THE PLANNING STAFF AND
14 ALLISON, GREAT WORK. REALLY, JUST EXCELLENT WORK, AS
15 USUAL.

16 I DO JUST WANT TO MAKE ONE COMMENT AND THAT IS
17 THE ONLY WAY WE ARE ONLY GOING TO GET THIS ALL DONE IS
18 IF WE BUILD TO SCALE AND IF WE FIGURE OUT A WAY TO DO
19 THAT. SO I THINK THE WORK THAT YOU ARE DOING IS
20 INCREDIBLE, BUT I THINK IT'S REALLY GOING TO BE UP TO
21 THE CITY AND THE STATE AND THE FEDERAL GOVERNMENT TO
22 ACTUALLY HELP US EXECUTE ON THAT. SO THANK YOU VERY
23 MUCH.

24 PRESIDENT MATSUDA: COMMISSIONER NAGESWARAN.

25 RUCHIRA NAGESWARAN: SO, I'M GOING TO GO THROUGH

1 THE POINTS THAT MS. VANDERSLICE HAD IN HER SLIDESHOW
2 FOR, YOU KNOW, COMMENTING ON THE ADEQUACY OF THE EIR.

3 FIRST WAS THE IDENTIFICATION OF HISTORIC
4 RESOURCES, AND THE HISTORIC BACKGROUND ANALYSIS IN TEXT
5 AND GRAPHICS IS WELL-DEVELOPED AND COMPELLING AND
6 COMPREHENSIVE.

7 WHAT WAS INTERESTING TO ME WAS TABLE 4.2-8. IT
8 SHOWED HOW THE NUMBER OF HISTORIC RESOURCES IN EACH OF
9 THE NEIGHBORHOODS WAS CORRELATED WITH THE AMOUNT OF NEW
10 UNITS, THE CHANGE IN THE NUMBER OF THE UNITS BETWEEN THE
11 TWO SCENARIOS OF THE BASELINE AND THE PROPOSED.

12 FOR EXAMPLE, MISSION WENT DOWN 1,300 UNITS, AND
13 SUNSET PARKSIDE WENT UP 16,300 UNITS. AND IT WAS
14 FASCINATING TO SEE THE GRAPHICS OF THAT AND THEN HAVE
15 THAT IN THE TABLE AND REALLY SHOW, YOU KNOW, WHERE OUR
16 HISTORIC RESOURCES ARE AND WHERE THE FOCUSES ARE GOING
17 TO BE. AND SO THAT WAS VERY HELPFUL.

18 IN THE ANALYSIS OF THE IMPACTS, WE DO SEE A
19 SIGNIFICANT UNAVOIDABLE IMPACT. AND ON TABLE 4.2-7,
20 THERE ARE A NUMBER OF POINTS MADE FOR VARIOUS TYPES OF
21 PROJECTS.

22 THE ONES THAT CAME TO MIND IN TERMS OF IMPACT
23 WERE NEW INCOMPATIBLE CONSTRUCTION WITHIN THE HISTORIC
24 DISTRICT, ALTERATION OF INDIVIDUAL RESOURCES
25 INCONSISTENT WITH THE STANDARDS, NEW INFILL

1 CONSTRUCTION, AND FOR THOSE THREE, I THINK IT SAID
2 EITHER SIGNIFICANT OR LESS THAN SIGNIFICANT, BUT WOULD
3 THEY NOT BE SIGNIFICANT AND UNAVOIDABLE RATHER THAN
4 LESS THAN SIGNIFICANT?

5 ALLISON VANDERSLICE: SO THE LESS THAN
6 SIGNIFICANT/SIGNIFICANT, OR LESS THAN SIGNIFICANT AND
7 SIGNIFICANT IS REFLECTIVE OF WHAT IS SHOWN AS THE
8 EXAMPLE, SO WE CAN MAKE THAT CLEARER IF THAT'S HELPFUL.

9 COMMISSIONER NAGESWARAN: OKAY, GOT. OKAY, THAT
10 MAKES SENSE.

11 AND SIMILARLY WITH THE NEW CONSTRUCTION WITH
12 HEAVY EQUIPMENT AND BUILDING RELOCATION, IT TALKED ABOUT
13 SIGNIFICANT OR LESS THAN SIGNIFICANT, AND I THOUGHT ISN'T
14 IT MITIGATABLE? BUT MAYBE YOU ARE NOT TALKING ABOUT
15 MITIGATION AT THAT POINT WHEN YOU'RE -- OKAY.

16 ALLISON VANDERSLICE: AND THEN THAT TABLE IS
17 ALSO MEANT TO BE PRIOR TO MITIGATION.

18 COMMISSIONER NAGESWARAN: GOT IT. OKAY. THAT
19 MAKES SENSE. OKAY.

20 AND AS FAR AS THE MITIGATION MEASURES, THEY WERE
21 QUITE EXTENSIVE AND DEVOTED TO THE HISTORIC RESOURCES.
22 YOU HAD CONSTRUCTION PLAN AND MONITORING DOCUMENTATION
23 OF INDIVIDUAL BUILDINGS AND DISTRICTS, PUBLIC
24 INTERPRETATION, ORAL HISTORY, SALVAGE PLAN, CONTEXT
25 STATEMENTS, AND COMMUNITY OUTREACH.

1 WITH SUCH A COMPREHENSIVE PLAN, WHERE WE'RE
2 DEVELOPING ALONG TRANSIT DOORS AND OUTLYING AREAS,
3 ALTHOUGH THESE ARE CONTAINED WITHIN THOSE AREAS, THEY DO
4 AFFECT THE HISTORIC RESOURCES IN TERMS OF CUMULATIVE
5 IMPACT AND ALSO SETTING.

6 SO I THINK ONE OTHER THING CAME TO MIND, AND IT
7 MAY BE SOMEWHERE IN THERE BURIED IN THERE, GUIDELINES
8 FOR NEW DEVELOPMENT, SO THAT WE ARE CREATING NEW CONTEXTS
9 THAT ARE CONSIDERATE AND HISTORIC, BUT ALSO IN THE
10 FUTURE WE ARE NOT LOOKING BACK AND SAYING, OH, YEAH,
11 THAT'S WHERE WE DEVELOPED SOMETHING DURING THAT
12 REDEVELOPMENT ERA.

13 SO I THINK HOWEVER THAT CAN COALESCE, THAT WOULD
14 BE VERY HELPFUL.

15 IN TERMS OF THE ALTERNATIVES, NO PROJECT,
16 DEVELOPING THE EAST SIDE, PRESERVATION, DISPERSED
17 GROWTH, AND PLAN BAY AREA, IT WAS INTERESTING TO NOTE
18 THAT THE NO PROJECT AND PRESERVATION HAD THE LEAST
19 IMPACT AND THE PRESERVATION ALLOWED FOR AS MANY UNITS AS
20 THE PROPOSED PROJECT.

21 AND I WAS GRAVITATING TO THOSE OBVIOUSLY, BUT AT
22 THE SAME TIME, ONLY DEVELOPING THE EAST SIDE JUST DIDN'T
23 SEEM QUITE RIGHT. WE ARE GOING TO HAVE SO MUCH CONGESTION
24 THAT WE NEED TO HAVE A LITTLE BIT MORE BREATHING ROOM IN
25 THAT. OVERALL, I AM JUST INCREDIBLY IMPRESSED WITH ALL

1 OF THE DESCRIPTIONS AND THE CORRELATIONS AND THE DEPTH
2 OF THE ANALYSIS. THAT WAS FANTASTIC. THANK YOU.

3 PRESIDENT MATSUDA: THANK YOU. COMMISSIONER
4 BLACK.

5 COMMISSIONER BLACK: ONCE AGAIN, COMMISSIONER
6 NAGESWARAN GOT IN AHEAD OF ME.

7 I COULDN'T AGREE MORE THAT THE COMPARISON, THIS
8 COMPARISON TABLE WAS FASCINATING. IN COMPARISON TO ALL
9 THE ALTERNATIVES, THE PRESERVATION ALTERNATIVE WHICH IS
10 INTENDED, AND IT'S WITHIN OUR SCOPE OF DISCUSSION TO
11 REDUCE IMPACTS ON BUILT-ENVIRONMENT HISTORIC RESOURCES,
12 HAS -- IS THE ONLY ALTERNATIVE THAT HAS EITHER SIMILAR
13 IMPACTS TO THE PROPOSAL OR FEWER.

14 ALL OF THE OTHER ALTERNATIVES HAVE MORE IMPACTS
15 OR SIMILAR IMPACTS. AND SO, BEING A LITTLE BIT MORE
16 SPECIFIC, IT'S REALLY NOTABLE THAT THIS HAS QUITE A
17 DISTINCTION IN THAT RESPECT.

18 CAN I JUST QUICKLY A LITTLE BIT MORE DETAIL IN
19 THE TIMING OF THIS APPROVAL AND THE CITYWIDE SURVEY?
20 YOU KNOW, WE'VE GOT THE INFORMATION HERE ON THE EIR. I AM
21 NOT REALLY CLEAR EXACTLY WHEN THE BOARD OF SUPERVISORS
22 WILL TAKE ACTION AND/OR THE HCD. OR MAYBE THE BOARD OF
23 SUPERVISORS DON'T TAKE ACTION. I ASSUMED THEY WOULD.

24 ALLISON VANDERSLICE: SO THE EIR IS PLANNED TO
25 GO AHEAD FOR CERTIFICATION AT THE PLANNING COMMISSION

1 EARLY IN 2023. AND THEN AS YOU KNOW THE CITYWIDE SURVEY
2 IS A MULTIYEAR PROJECT.

3 SO JUST TO BE CLEAR ABOUT THAT IS THAT AS
4 PROJECT REVIEW CONTINUES, WE WILL ALSO BE IN THE FIELD
5 DOING THE CITYWIDE SURVEY. SO AS THAT INFORMATION COMES
6 IN THAT WILL THEN INFORM PROJECT REVIEW.

7 SO WHILE WE HAVE HISTORIC RESOURCES THAT ARE
8 IDENTIFIED IN THIS DOCUMENT THAT ARE SORT OF A SNAPSHOT
9 OF 2021, BUT IT DOESN'T MEAN THAT AS PROJECT REVIEW
10 MOVES FORWARD THAT WE ARE TIED TO THOSE PARTICULAR
11 HISTORIC RESOURCES.

12 SO AS THE CITYWIDE SURVEY UPDATES OUR HISTORIC
13 RESOURCE INFORMATION, THAT WILL CONTINUE TO INFORM THE
14 PROJECT REVIEW THAT WE DO. AND THEN ONCE WE HAVE AN
15 IDENTIFIED HISTORIC RESOURCE EITHER THROUGH THE
16 CITYWIDE SURVEY OR THROUGH THE CEQA REVIEW PROCESS, THEN
17 WE WOULD DETERMINE, YOU KNOW, PROJECT IMPACTS AND THEN
18 APPROPRIATE MITIGATION MEASURES.

19 COMMISSIONER BLACK: I APPRECIATE THAT. THAT IS
20 WHAT I ASSUMED, BUT I WANTED BE CLEAR BECAUSE THIS IS A
21 PROGRAMMATIC EIR, WHICH MEANS -- I DON'T THINK MANY
22 PEOPLE UNDERSTAND HOW MASSIVE THIS IS. THIS IS A
23 MASSIVE PROJECT AND A MASSIVE DOCUMENT, AND IT HAS
24 LONG-RANGE IMPACTS ON THE CITY, AND I WANTED TO MAKE
25 SURE IT WAS CLEAR HOW THE CITYWIDE SURVEY, WHICH

1 CLEARLY ISN'T GOING TO BE DONE PRIOR TO THIS, WOULD BE
2 EFFECTIVE UNDER THAT. SO THANK YOU VERY MUCH.

3 ALLISON VANDERSLICE: SURE.

4 PRESIDENT MATSUDA: THANK YOU. COMMISSIONER
5 WRIGHT.

6 JASON WRIGHT: YES. SO I HAD A SIMILAR QUESTION
7 AS COMMISSIONER BLACK AND JUST TO CONFIRM THAT THE -- IF
8 THE PRESERVATION ALTERNATIVE IS SELECTED, THAT THIS
9 WOULD BE KIND OF PRESCRIPTIVE OR PROGRAMMATIC AS
10 COMMISSIONER BLACK WAS MENTIONING, AND THAT PROPERTIES
11 THAT ARE FOUND TO BE HISTORIC IN THE FUTURE WOULD KIND OF
12 BE ADDRESSED IN THE SAME WAY, AND THAT MIGHT CHANGE THE
13 HOUSING NUMBERS MAYBE IN THE END. IS THAT CORRECT?

14 BUT THE MITIGATIONS AND REVIEWS AND SUCH WOULD
15 BE KIND OF DRIVEN IN THE SAME WAY? IS THAT CORRECT OR
16 CLEAR?

17 ALLISON VANDERSLICE: LET ME REPHRASE THE
18 QUESTION TO MAKE SURE.

19 ARE YOU ASKING SPECIFICALLY ABOUT THE
20 PRESERVATION ALTERNATIVE THAT THAT WAS IMPLEMENTED
21 RATHER THAN THE PROPOSED ACTION? OR ARE YOU ASKING IN
22 GENERAL ABOUT THE PROPOSED ACTION? OR BOTH?

23 JASON WRIGHT: GOOD QUESTION. I WAS THINKING
24 ABOUT THE PRESERVATION ALTERNATIVE, BUT I THINK, I
25 GUESS, ANY SELECTED ALTERNATIVE OR PROPOSED ACTION.

1 I AM JUST CURIOUS ABOUT HOW PROPERTIES THAT ARE
2 FOUND TO BE HISTORIC UNDER/THROUGH THE CITY SURVEY OR
3 OTHERWISE WOULD BE ADDRESSED, OR MAYBE THIS IS KIND OF
4 YOUR ANSWER PREVIOUSLY.

5 ALLISON VANDERSLICE: YES, I MEAN, IT WOULD BE
6 THE SAME PROCESS, SO THAT PROCESS IS LAID OUT IN THE
7 EIR, AND THAT WOULD BE CORRECT FOR THE PROPOSED ACTION
8 OR FOR THE PRESERVATION ALTERNATIVE.

9 THE DIFFERENCE WITH THE PRESERVATION ALTERNATIVE
10 IF THAT WAS TO MOVE FORWARD, IT WOULD ALTER SOME OF THE
11 POLICIES TO PRESERVE HISTORIC RESOURCES ALONG WITH
12 PROJECTING NEW HOUSING GROWTH. SO THAT'S A LITTLE BIT
13 OF THE CHANGE.

14 AND THEN THERE'S ALL OF THE MODELING THAT WAS
15 DONE FOR THE PROPOSED ACTION AND THEN THE PRESERVATION
16 ALTERNATIVE SORT OF SHIFTS SOME OF THE FUTURE HOUSING
17 GROWTH TO DIFFERENT AREAS OF THE CITY, AND IT'S JUST A
18 MINOR SHIFT, REALLY, IN COMPARISON TO THE PROPOSED ACTION.

19 BUT THE SAME PROCESS WOULD BE FOLLOWED, SO WE
20 WOULD STILL CONTINUE TO DO ENVIRONMENTAL REVIEWS OF
21 PROJECTS. THEY WOULD COME IN; WE'D DETERMINE IF WE
22 WOULD HAVE AN HISTORIC RESOURCE IDENTIFICATION; IF NOT,
23 WE WOULD DO THAT AS LONG AS THE PROJECT, YOU KNOW, ROSE
24 TO A LEVEL OF NEEDING THAT EVALUATION TO BE COMPLETED.

25 AND THEN IF WE DO HAVE AN HISTORIC RESOURCE WE

1 WOULD REVIEW WHETHER OR NOT THE PROJECT RESULTED IN AN
2 IMPACT TO THAT HISTORIC RESOURCE, AND THEN IF IT DID WE
3 WOULD HAVE THAT WHOLE RANGE OF MITIGATION MEASURES WHICH
4 ARE AVAILABLE TO US.

5 AND AS I EXPLAINED, WE WOULDN'T BE USING ALL OF
6 THOSE MITIGATION MEASURES, BUT THERE WOULD BE A NEXUS
7 BETWEEN THE TYPE OF HISTORIC RESOURCE IT WAS, IF IT'S
8 SIGNIFICANT FOR ARCHITECTURE OR FOR CULTURAL
9 SIGNIFICANCE OR BOTH, THE MITIGATIONS WOULD BE A
10 LITTLE BIT DIFFERENT, AND IT WOULD ALSO RELY ON WHAT THE
11 PROPOSED IMPACT OF THE PROJECT WAS CAUSING TO THAT
12 HISTORIC RESOURCE.

13 DOES THAT MAKE SENSE?

14 JASON WRIGHT: YEAH, YEAH. NO, IT DOES. I
15 THINK THAT SOUNDS GOOD.

16 AND I AM JUST CURIOUS: IS THERE TO BE ANY
17 FUTURE REVIEW BY THIS COMMISSION ON THIS EIR?

18 ALLISON VANDERSLICE: NO.

19 JASON WRIGHT: OKAY.

20 PRESIDENT MATSUDA: THANK YOU. COMMISSIONER
21 JOHNS.

22 RICHARD JOHNS: OH, THANK YOU. AT THIS POINT, THE
23 COMMENTS THAT I WAS GOING TO MAKE HAVE ALREADY BEEN MADE.
24 SO I JUST HAVE ONE MORE WHICH IS I THINK THIS IS REALLY A
25 VERY THOUGHTFUL AND NUANCED ANALYSIS AND PRESENTATION OF AN

1 EXTRAORDINARILY LARGE AND COMPLEX SITUATION, AND I THINK
2 THAT EVERYBODY WHO WORKED ON THIS SHOULD BE COMMENDED.

3 I DO THINK IT FAIRLY AND ADEQUATELY FOCUSES ON
4 THE PERTINENT ISSUES AND PROBLEMS AND MAKES A REALLY
5 WELL-REASONED AND WELL-THOUGHT OUT COMMENTS AND
6 APPROACHES TO THEM.

7 PRESIDENT MATSUDA: I TOTALLY AGREE. AND I
8 REALLY, REALLY WANT TO THANK THE PLANNING STAFF AND ALL
9 OF YOU FOR BEING INVOLVED AND REALLY PUTTING SOME VERY
10 SERIOUS AND CONSIDERATE THOUGHT INTO THIS.

11 I DON'T KNOW IF -- THIS IS JUST A TOTALLY
12 DIFFERENT DOCUMENT FROM WHAT WE HAVE SEEN IN THE PAST
13 WHEN WE LOOK AT HISTORIC RESOURCES AND THE ANALYSIS. I
14 DON'T KNOW WHY IF IT IS BECAUSE THE HPC IS A RELATIVELY
15 NEW COMMISSION THAT WE SAW IT GO FROM A ONE PARAGRAPH
16 KIND OF MITIGATION MEASURE, ALTERNATIVE KIND OF THING
17 TO WHAT WE ARE KIND OF SEEING TODAY.

18 BUT THIS IS A REALLY SPECIAL DOCUMENT AND
19 I THINK YOU SHOULD ALL BE REALLY PROUD OF IT.

20 AND I FEEL THAT WITHIN THE WORLD OF EQUITY THAT
21 HISTORIC RESOURCES HAVE FINALLY REACHED THAT LEVEL OF
22 EQUITY WHERE IT'S DEFINITELY A CONSIDERED SUBJECT MATTER
23 WHEN LOOKING AT THE WHOLE CITY AND COUNTY OF SAN
24 FRANCISCO, SO I THANK YOU FOR DOING THAT.

25 AND I DON'T THINK WE HAVE ANY FURTHER COMMENTS

1 FROM THE COMMISSION, JONAS.

2 JONAS IONIN: VERY GOOD. THEN IN THAT CASE, WE
3 CAN MOVE ON.

4 [END OF ITEM 7, 1:26 P.M.]

5
6 ---OOO---

REPORTER'S CERTIFICATION

I, MIA CAMERA, A SHORTHAND REPORTER, DO HERBY
CERTIFY:

THAT THE FOREGOING WEBEX TRANSCRIPTION
PROCEEDINGS WERE TRANSCRIBED STENOGRAPHICALLY INTO
TYPEWRITTEN FORM UNDER MY DIRECTION; THAT THE FOREGOING
IS A TRUE RECORD TO THE BEST OF MY ABILITY OF
PROCEEDINGS TAKEN AT THAT TIME.

IN WITNESS WHEREOF, I HAVE HEREUNTO DIGITALLY
SUBSCRIBED MY NAME.

DATED: JUNE 16, 2022


MIA CAMERA

ATTACHMENT 4

Revised Housing Element Update Policies and Implementing Actions (draft 4, October 2022) (EIR Appendix B)

Text changes have been made to EIR Appendix B, Housing Element Update Policies and Implementing Actions to reflect the fourth draft of the San Francisco Housing Element 2022 Update, October 2022. Some policies have been refined based on community engagement and feedback from the California Department of Housing and Community Development but the intent remains similar to the original.

Housing Element Goals, Objectives, Policies, and Actions

DRAFT 4 – OCTOBER 2022

Prepared as Part of the
San Francisco Planning Department's

Housing Element Update 2022



**San Francisco
Planning**

Overview of Goals and Objectives

1. Recognize the right to housing as a foundation for health, and social and economic well-being.
 - a. Ensure housing stability and healthy homes. (*Policies 1, 2, 3, 9, 39*)
 - b. Advance equitable housing access. (*Policies 1, 2, 3, 5, 6, 7, 9, 27*)
 - c. Eliminate homelessness. (*Policies 8, 9, 22*)
2. Repair the harms of historic racial, ethnic, and social discrimination against American Indian, Black, and other people of color.
 - a. Make amends through truth-telling of the historic harms. (*Policy 10*)
 - b. Offer reparations for communities directly harmed by past discriminatory government action¹ and bring back their displaced people. (*Policies 11, 12*)
 - c. Increase accountability to American Indian, Black, and other communities of color. (*Policies 2, 13, 14, 18, 21, 29*)
3. Foster racially and socially inclusive neighborhoods through equitable distribution of investment and growth.
 - a. Build intergenerational wealth for American Indian, Black, and other communities of color.² (*Policies 5, 11, 12, 15, 16, 17, 18, 38*)
 - b. Create a sense of belonging for all communities of color within [Well-resourced neighborhoods](#)³ through expanded housing choice. (*Policies 19, 20, 31*)
 - c. Eliminate community displacement within [areas vulnerable to displacement](#).⁴ (*Policies 1, 3, 11, 18, 21, 29*)
4. Provide sufficient housing for existing residents and future generations for a city with diverse cultures, family structures, and abilities.
 - a. Substantially expand the amount of permanently affordable housing for extremely low- to moderate-income households. (*Policies 3, 8, 15, 19, 22, 23, 24, 26, 27, 28, 29, 30*)
 - b. Expand small and mid-rise multi-family housing production to serve our workforce, prioritizing middle-income households. (*Policies 4, 20, 25, 26, 27, 28, 29, 30, 31*)
 - c. Diversify housing types for all cultures, family structures, and abilities. (*Policies 7, 32, 33, 34, 35, 36*)
5. Promote neighborhoods that are well-connected, healthy, and rich with community culture.
 - a. Connect people to jobs and their neighborhood with numerous, equitable, and healthy transportation and mobility options. (*Policies 17, 37, 38*)
 - b. Advance environmental justice, climate, and community resilience. (*Policies 38, 39, 40*)
 - c. Elevate expression of cultural identities through the design of active and engaging neighborhood buildings and spaces. (*Policies 12, 37, 41, 42*)

1 Discriminatory programs led or sanctioned by government action, include but are not limited to urban renewal, redlining, segregated public housing, racial covenants, and exclusionary zoning regulations, such as single-family zoning and communities directly harmed include American Indian, Black, Japanese, Filipino, and other communities.

2 For the purpose of the Housing Element these communities are defined as [Priority Equity Geographies](#) that are identified and updated by [Department of Public Health's Community's Health Needs Assessment as Areas of Vulnerability](#).

3 These areas are identified under [California Housing and Community Development Opportunity Area Maps](#), as high and highest resource.

4 Areas identified in the [Urban Displacement Project's displacement and gentrification analysis](#) as vulnerable or undergoing displacement or gentrification. This analysis is undergoing an update and a new version will be released early 2022, which will inform changes to the definition used under this objective.

Notes to Reader

The following is organized in two sections is organized:

- I. *Goal* and underlying *Objectives* with brief framework narratives
- II. *Policies* and underlying *Actions* listed with corresponding objectives, related programs, *responsible agencies*, and the timeframe for action initiation as follows:

Short (0-2 years)
Medium (3-5 years)
Long (6-8 years)
Ongoing

Census data cited in the goal and objective narratives has been updated since its last release in January 2022. This new data reflects population definitions based on conversations with the American Indian community. Data from other sources, such as MOHCD and HSH, however, were not able to be updated along this new definition.

A glossary of terms is provided at the end of this document as a reference.

The following is a list of acronyms used to identify the agencies responsible for each Housing Element action:

APD	Adult Probation Department	OCII	Office of Community Investment and Infrastructure
ARTS	Arts Commission	OEWD	Office of Economic and Workforce Development
BOS	Board of Supervisors	ORE	Office of Racial Equity
DBI	Department of Building Inspection	ORCP	Office of Resilience and Capital Planning
DPH	Department of Public Health	OSB	Office of Small Business
DPW	Department of Public Works	Planning	Planning Department
DSW	Department on Status of Women	SF Port	Port of San Francisco
HSA	Human Services Agency	SFFD	Fire Department
HRC	Human Rights Commission	SFHA	San Francisco Housing Authority
HSH	Department of Homelessness and Supportive Housing	SFMTA	San Francisco Municipal Transportation Agency
Mayor	Mayor's Office	SFPUC	San Francisco Public Utilities Commission
MOD	Mayor's Office on Disability		
MOHCD	Mayor's Office of Housing and Community Development		

Goal 1.

Recognize the right to housing as a foundation for health, and social and economic well-being.

Challenge - Access to safe and affordable housing is a social determinant of health. Several studies have found that housing instability contributes to children and youth being more vulnerable to mental health problems – including developmental delays, poor cognitive outcomes,⁵ and depression⁶ - and inferior educational opportunities.⁷ This trauma can compound to impact health, education, and employment outcomes that can affect people throughout their lives and their descendants' lives. The racial and social disparities associated with housing instability are well documented and include rent burden (paying more than 30% of their income on rent), homelessness, overcrowded living (more than one person per room, including the living room), and health conditions (see Figure 1).

The COVID-19 pandemic further exposed longstanding racial disparities. Communities of color have endured higher infection and death rates partially due to poor living conditions (such as overcrowding) and poor health conditions.

Path Forward - The United Nations (UN) defines the right to adequate housing as “the right to live somewhere in security, peace and dignity.” The UN sees the right to adequate housing as enacting policies, strategies, and programs that “are needed to prevent homelessness, prohibit forced evictions, address discrimination, focus on the most vulnerable and marginalized groups, ensure security of tenure to all, and guarantee that everyone’s housing is adequate.”⁸ For the first time, San Francisco is formally recognizing the right to housing. By doing this, the City is making a commitment to offer housing solutions that are healthy and dignified to vulnerable households: those who are unhoused, poorly housed, have been subject to discrimination, or are exposed to instability or inequities due to disabilities, disorders, criminal records, traumas, immigration status, tenure, income, sexual orientation, gender identity, or race.

In response to the current COVID-19 health crisis, the City prioritized housing and shelter for our unhoused populations embracing the connection between housing and health. A commitment to the right to housing will direct the City to scale up its resources in the long-term to offer these equitable outcomes through series of investments and prioritizations. Achieving this goal will mean eliminating

5 Coley, R. L., Leventhal, T., Lynch, A. D., & Kull, M. (2013). Relations between housing characteristics and the well-being of low-income children and adolescents. *Developmental psychology*, 49(9), 1775.

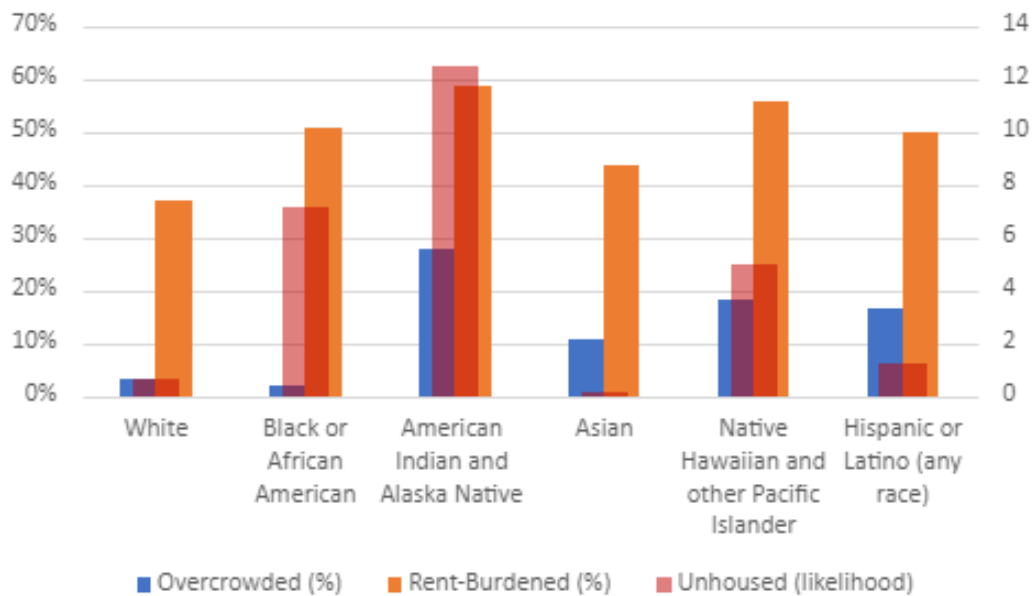
6 Hatem, C., Lee, C. Y., Zhao, X., Reesor-Oyer, L., Lopez, T., & Hernandez, D. C. (2020). Food insecurity and housing instability during early childhood as predictors of adolescent mental health. *Journal of Family Psychology*, 34(6), 721.

7 Ziol-Guest, K. M., & McKenna, C. C. (2014). Early childhood housing instability and school readiness. *Child development*, 85(1), 103-113.

8 Office of the United Nations High Commissioner for Human Rights, The right to adequate housing - Fact Sheet No. 21/Rev. 1 (2009). Geneva; United Nations. https://www.ohchr.org/documents/publications/fs21_rev_1_housing_en.pdf

homelessness, ensuring housing stability and reversing inequities in housing access for those who are vulnerable.

Figure 1. Overcrowding, Housing Rent Burden, and Homelessness by Race (San Francisco)



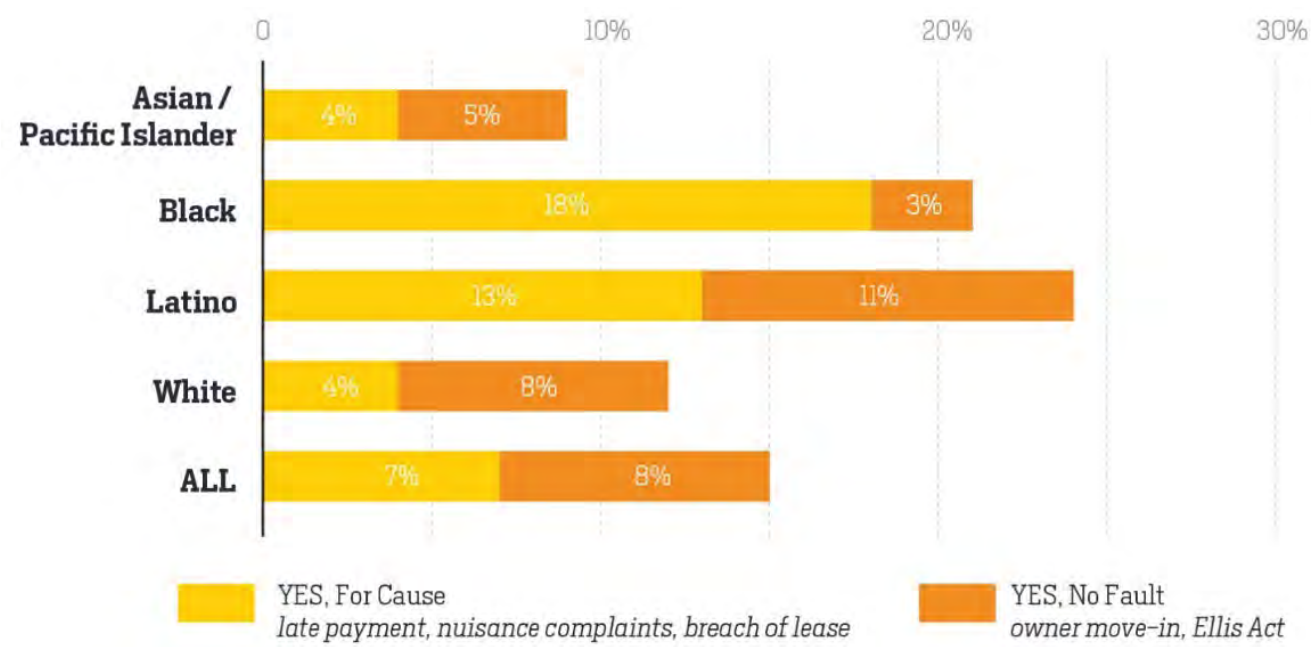
Source: ACS 2019 1-year Estimates; 2019 San Francisco Point-In-Time Homeless Count and Survey Report, Department of Homeless and Supportive Housing.

OBJECTIVE 1.A
ENSURE HOUSING STABILITY AND HEALTHY HOMES

Challenge - Around two thirds of San Francisco's households are renters. The majority of San Francisco's rental housing stock is subject to the [Rent Control Ordinance](#), which limits annual rent increases and includes eviction protections. Rent control, however, has been critical but insufficient to fully protect low-and moderate-income residents, as well as American Indian, Black, and other people of color from being at risk of eviction or displacement (see Figure 2). Evictions and displacement increased during recent economic booms during which time rental prices in San Francisco rose to among the highest in the country. The increase in rental prices far outpaced wage growth for low- and moderate-income renters. Now over 80% of very low-income renter households in San Francisco are rent burdened (paying more than 30% of their income on rent). More low- and moderate-income renters are severely cost burdened (paying more than 50% of their income on rent) today compared to 1990 (see Figure 3). Over the past two decades, the city has more households in the low-income category than any other income group (see Figure 4). A survey of around 3,200 renters indicated that about one third would have no housing choice if displaced from their current residence, and another third would have to leave San Francisco to find housing (see Figure 5).

Path Forward - Recognizing a right to housing must start ensuring housing stability for tenants, especially those with limited housing choices and who experience racial and social disparities. San Francisco will expand investment in rental assistance programs as a strong form of protection against housing instability, especially for low-income tenants. These programs have proven critical in preventing evictions during the recent pandemic and have received increased funding at the federal level. San Francisco continues to maintain some of the strongest eviction protections in the region and the country. For effective implementation of these protections, San Francisco passed an ordinance to create a new [rental housing inventory](#). Implementing this inventory will allow proactive enforcement and monitoring of our already strong protection measures, such as regulations controlling [Owner Move-Ins](#) or [Ellis Act Evictions](#). Full implementation will also inform a series of new improvements to these protections. The City will also focus on minimizing the abuse of temporary and nuisance related evictions. Ensuring housing stability also relies on preserving affordability of existing units with deed restrictions. The City's acquisition and rehabilitation programs have been in effect in the past decade and will need to be revamped to ensure the investments are effective and reach those who have been underserved. A renewed interest and focus on co-operative housing will offer expanded opportunities, whether through protections of existing cooperative housing or creating new shared equity and cooperative ownership models.

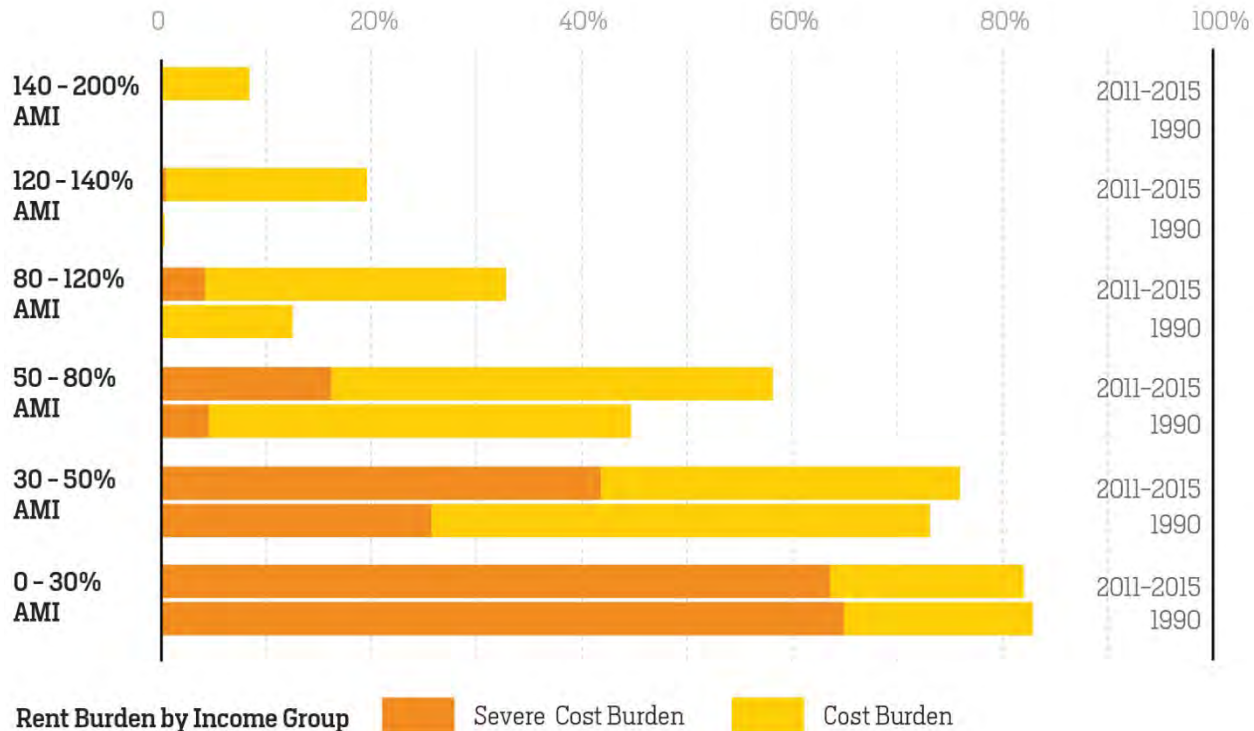
Figure 2. Percentage of the 2018 San Francisco Housing Survey respondents who reported being threatened with an eviction in the previous 5 years by race.



Source: San Francisco Housing Needs and Trends Report; San Francisco Planning Department 2018 Housing Survey.

Figure 3. Percentage of San Francisco households that were rent burdened* by income group (1990 vs 2015).

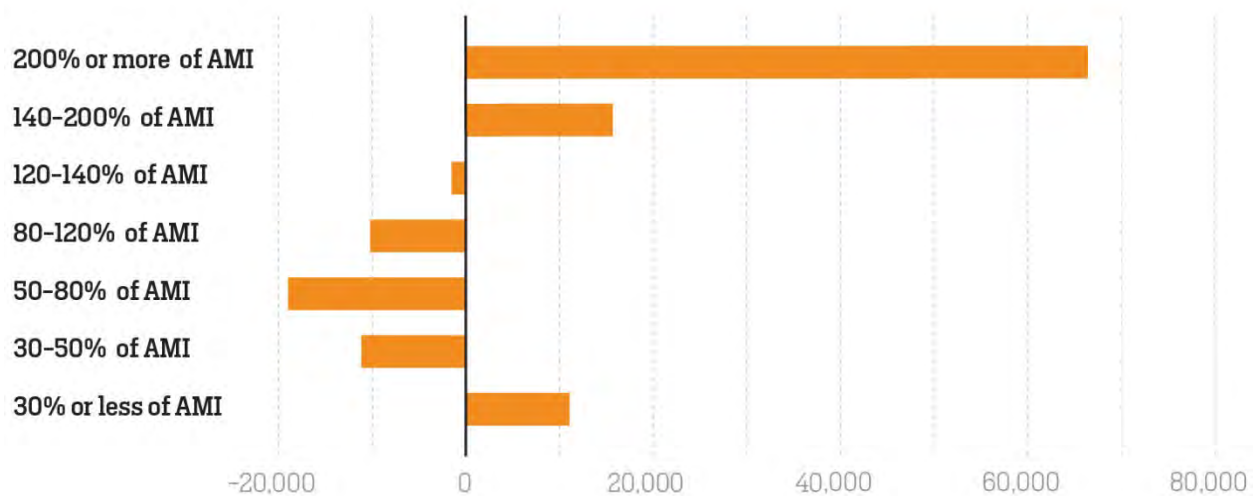
*Rent burden means paying between 30% and 50% of the household's income in rent; severe cost burden means paying more than 50% of the household's income in rent.



Source: San Francisco Housing Needs and Trends Report; 1990 Decennial Census (IPUMS-USA); ACS 2015 5-year Estimates IPUMS-USA).

Figure 4. Change in the number of households by household income group from 1990 to 2015.

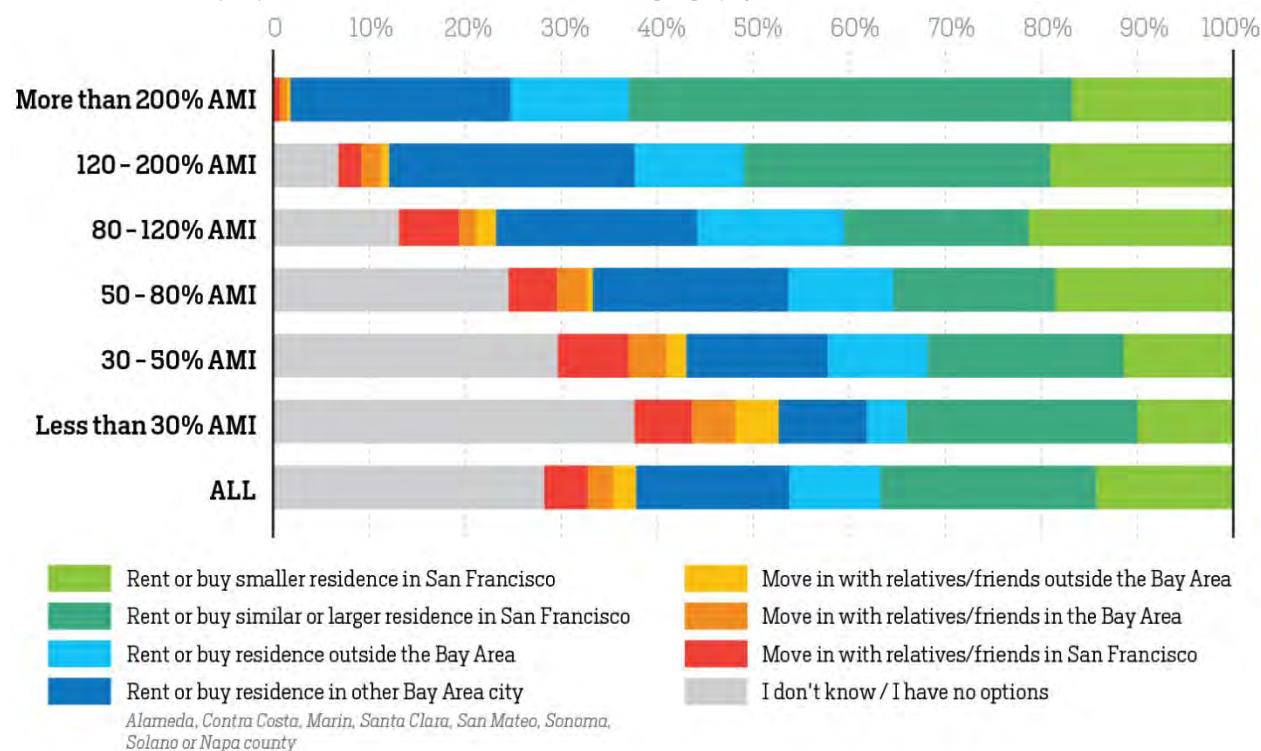
Area median income (AMI) is a normalized measure of income in a geography. 100% AMI is the median income for SF.



Source: San Francisco Housing Needs and Trends Report; 1990 Decennial Census (IPUMS-USA); ACS 2015 5-year Estimates IPUMS-USA).

Figure 5. Housing choices for 2018 San Francisco Housing Survey respondents if forced out of their current residence by income group.

Area median income (AMI) is a normalized measure of income in a geography. 100% AMI is the median income for SF.



Source: San Francisco Housing Needs and Trends Report; San Francisco Planning Department 2018 Housing Survey.

OBJECTIVE 1.B

ADVANCE EQUITABLE HOUSING ACCESS

Challenge - Federal fair housing laws prohibit discrimination based on race, ability, sexual orientation, gender identity, and household type. Despite these laws, racial and social disparities in housing access are stark. A major hurdle to housing equity is housing cost. More than half of Black households are rent burdened (paying more than 30% of their income on rent), and households of color overall are more likely to be rent burdened compared to white households (see Figure 6). The American Indian population is 17 times more likely to be homeless compared to their share of population, and Black households are seven times more likely (see Figure 7). The transgender and gender non-conforming (TGNC) community in San Francisco faces specific, heightened, and disproportionate challenges in accessing fair housing opportunities. Half of respondents to the US Transgender Survey report having experienced homelessness in their lifetime, and approximately fifty percent (50%) of transitional aged youth experiencing homelessness in the 2019 point in time count identified as LGBTQ+. Seventy percent

(70%) of transgender people living in shelters nationally have reported being harassed,⁹ contributing to the 24% of homeless transgender people in California that have reported avoiding in staying in a shelter for fear of mistreatment.¹⁰ Seniors and transitional aged youth (between the ages of 18 to 24) collectively made up more than half of the homeless population in 2019 (see Figure 8). Seventy-four percent (74%) of respondents of the 2019 Point-In-Time Homeless Count and Survey¹¹ reported living with chronic physical illnesses, physical disabilities, chronic substance use, and severe mental health conditions (see Figure 9). Amongst tenants, renters of color continue to be disproportionately affected by evictions in San Francisco. In a survey of around 3,200 renters, 24% of Latino/e/x renters and 21% of Black renters reported being threatened with eviction as opposed to only 9% of white renters (see Figure 2). While Black, American Indian, and other people of color would most benefit from greater affordable housing access, federal regulations and California Proposition 209, which bans institutions from affirmative action based on race, sex, or ethnicity, pose a challenge to the City to implement preference programs for the communities of color most affected by homelessness, eviction and displacement, such as the American Indian, Black and Latino(a,e) communities.

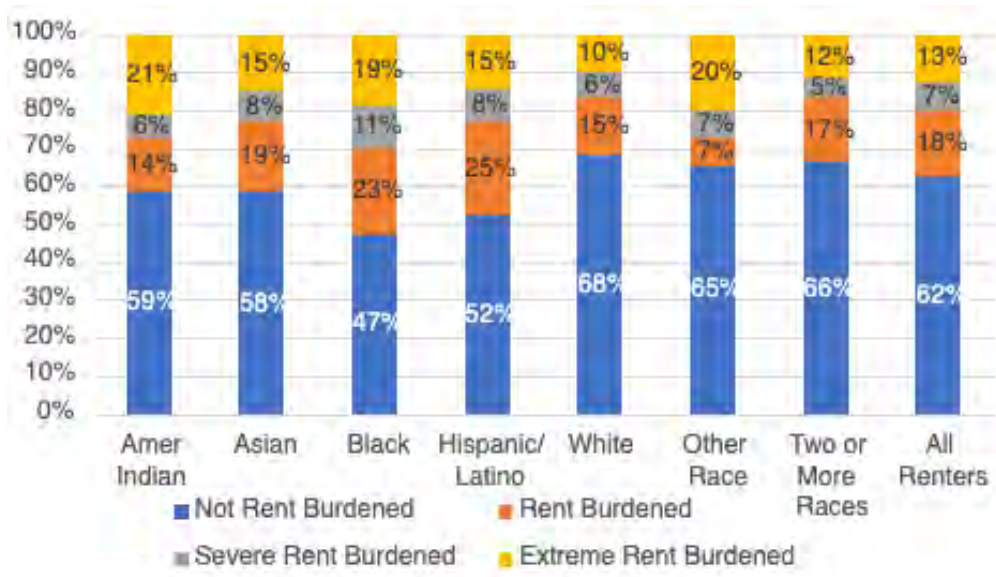
Path Forward - San Francisco has adopted various strategies including [programs](#) designed to ensure access for historically disadvantaged or currently vulnerable households in awarding below market rate units. These programs include the Displaced Tenant Housing Preference Program, Neighborhood Preference Program, and the Certificate of Preference Program. To effectively advance equity, the City will revise existing and implement other programs to improve access to permanently affordable housing for underserved racial and social groups. The City will identify clearer strategies to remove barriers to housing access for transgender, LGBTQ+, seniors, people with disabilities, formerly incarcerated individuals, and other specific vulnerable populations, to inform and strengthen current and new programs.

9 National Center for Transgender Equality (2016). 2015 US Transgender Survey: Executive Summary. Washington, DC. Accessible at: <http://www.transequality.org/sites/default/files/docs/USTS-Executive-Summary-FINAL.PDF>

10 National Center for Transgender Equality (2017). 2015 US Transgender Survey: California State Report. Washington, DC. Accessible at: <http://www.transequality.org/sites/default/files/docs/usts/USTSCAStateReport%281017%29.pdf>

11 Due to COVID-19, San Francisco did not conduct a PIT Count in 2021. The most recently available data at the time of this report is from 2019. New data from the 2022 PIT Count will be available in the summer of 2022. The final version of this report will be updated to contain the 2021 counts.

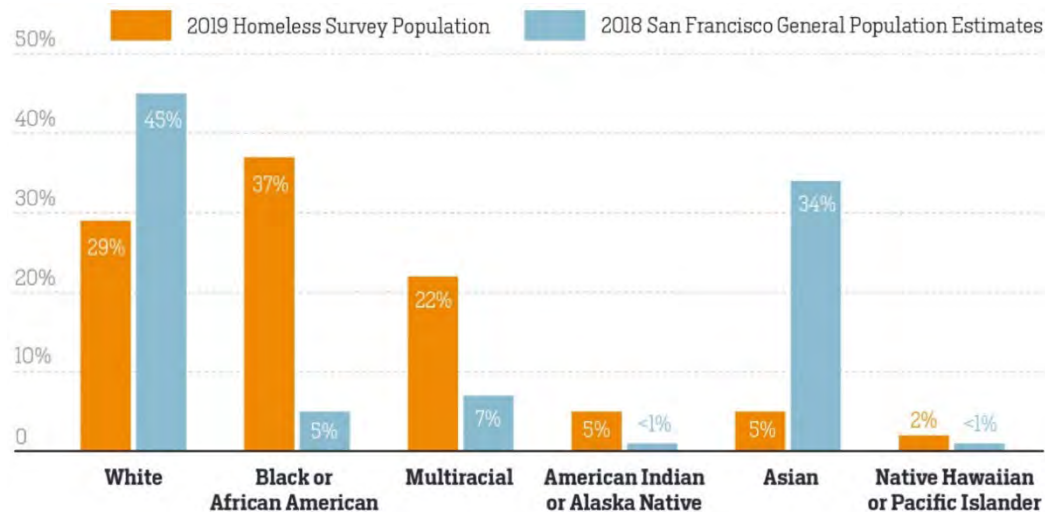
Figure 6. Percentage of households that are rent burdened* by race and ethnicity (2018).



*Rent burden means paying between 30% and 50% of the household's income in rent; severe cost burden means paying more than 50% of the household's income in rent.

Source: ACS 2018 5 Year Estimates (IPUMS-USA).

Figure 7. Percentage of people experiencing homelessness by race and ethnicity (2019).



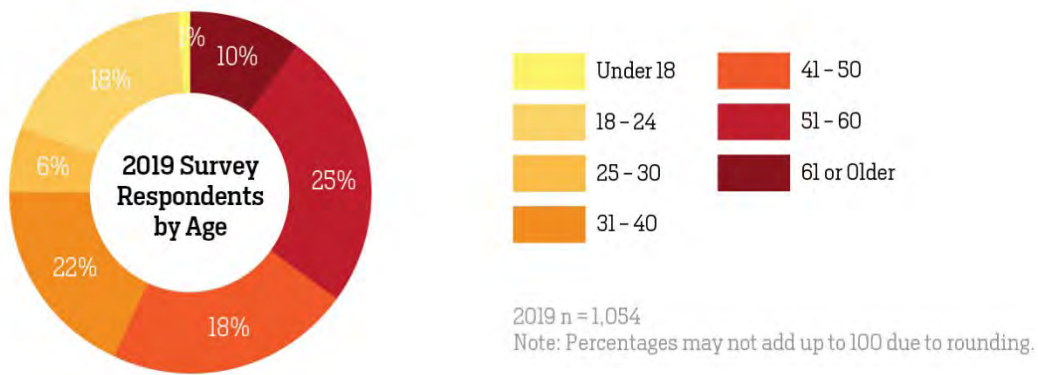
Homeless Survey Population n = 1,025

Note: Percentages may not add up to 100 due to rounding.

Source: San Francisco 2019 Point-In-Time Homeless Count and Survey Report, Department of Homeless and Supportive Housing.

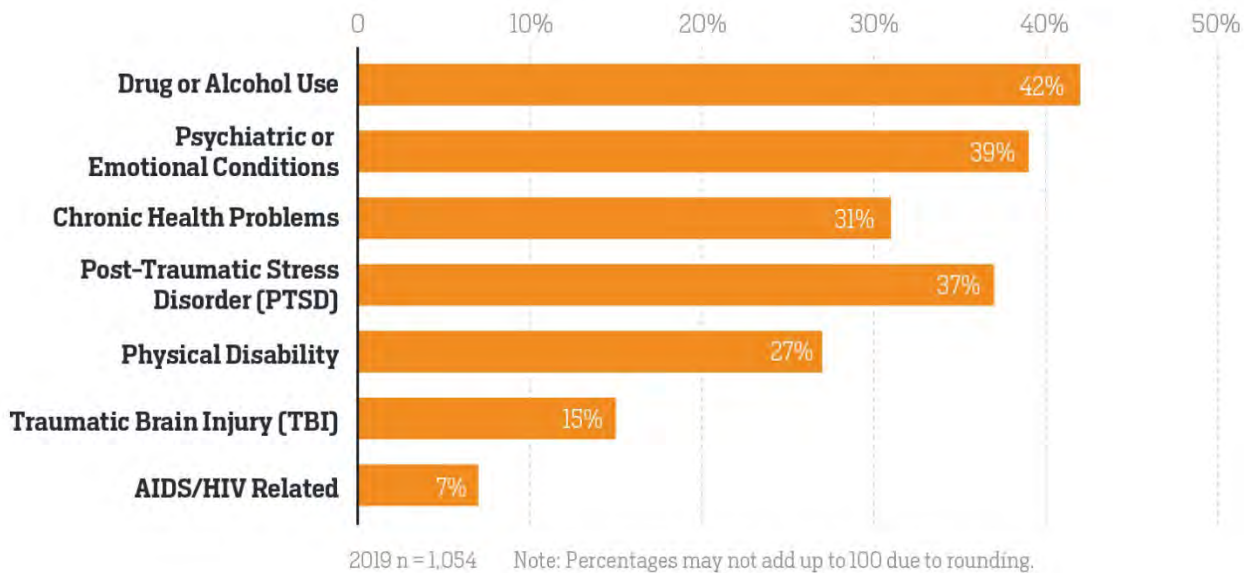
Note: Hispanic/Latino/e/x was represented in a separate chart: 18% of respondents identified as Hispanic/Latino/e/x for 2019 Homeless Survey Population, 15% identified as Hispanic/Latino/e/x for the 2019 San Francisco General Population Estimates.

Figure 8. Percentage of people experiencing homelessness by age group (2019).



Source: San Francisco 2019 Point-In-Time Homeless Count and Survey Report, Department of Homeless and Supportive Housing.

Figure 9. Percentage of people experiencing homelessness with different health conditions (2019).



Source: San Francisco 2019 Point-In-Time Homeless Count and Survey Report, Department of Homeless and Supportive Housing.

OBJECTIVE 1.C

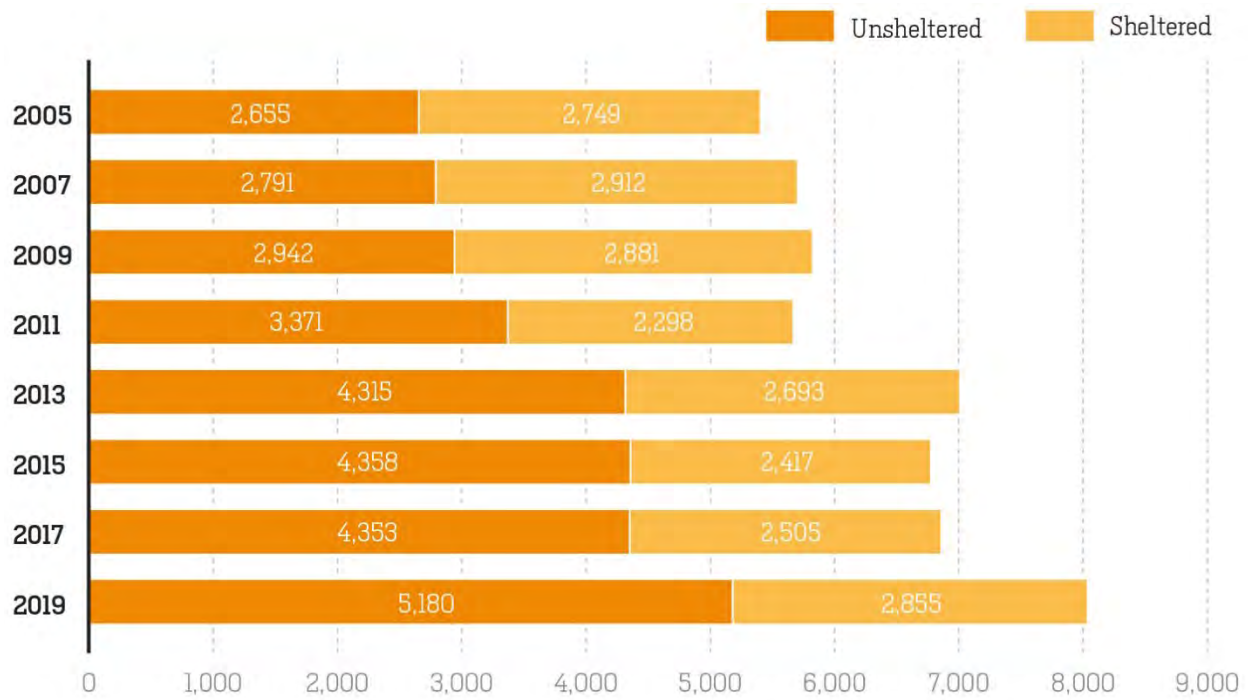
ELIMINATE HOMELESSNESS

Challenge - From 2005 to 2019,¹² the biennial Point-in-Time (PIT) Count of people experiencing homelessness increased from just over 5,400 individuals to approximately 8,000 individuals. Compared to 2015, homelessness increased by 17% (see Figure 10). Of these, 64% were unsheltered and 38% were experiencing chronic homelessness. Since 2015, the City has expanded considerably the number of Permanent Supportive Housing units, subsidies for operation, and temporary shelters. This will include approximately 4,000 units of additional Permanent Supportive Housing by end of 2022. The City has also reduced the number of unsheltered families. In 2016, the City and County of San Francisco created a new department, the Department of Homelessness and Supportive Housing (HSH), to make a significant and sustained reduction in homelessness in San Francisco through the coordinated provision of services. While improvements have been made at multiple levels, the number of unhoused residents has continuously grown over the years. Moreover, homelessness disproportionately impacts specific populations, such as Black and American Indian residents, transgender and LGBTQ+ people, people with disabilities, domestic violence survivors, and veterans. These inequities require targeted and tailored solutions to effectively meet their housing needs.

Path Forward - Recognizing the right to housing means providing basic access to healthy and dignified living for everyone. Eliminating homelessness is a foundation for this goal, which relies on a comprehensive set of strategies. The City will scale up investments in Permanent Supportive Housing and services, in addition to supporting and promoting other solutions such as housing vouchers, short and long-term rental assistance. For example, in July 2020, the city launched the Flexible Housing Subsidy Pool, a scattered-site Permanent Supportive Housing strategy that matches people experiencing homelessness to private market apartments across the city and provides supportive services so that they remain stably housed. The City will also increase the supply of deeply affordable housing as a homelessness prevention strategy for extremely low- and very low-income households as those households bear a higher risk of homelessness. The City prioritizes addressing chronic homelessness. San Francisco's current goal is to end family homelessness and reduce chronic homelessness by 50% by December 2022. Eliminating homelessness goes beyond focusing on what is urgent. In the long-term, meeting this objective means securing investments and solutions to also prevent households with less severe vulnerabilities from falling into homelessness.

¹² Due to COVID-19, San Francisco did not conduct a PIT Count in 2021. The most recently available data at the time of this report is from 2019. New data from the 2022 PIT Count will be available in the summer of 2022. The final version of this report will be updated to contain the 2021 counts.

Figure 10. Number of counted people experiencing homelessness in San Francisco by shelter status from 2005 to 2019.



Source: San Francisco 2019 Point-In-Time Homeless Count and Survey Report, Department of Homeless and Supportive Housing.

Goal 2.

Repair the harms of racial and ethnic discrimination against American Indian, Black, and other people of color.

Challenge - Our nation, from its inception, has initiated and perpetuated harm against people of color, including the genocide, exploitation, and dispossession of American Indian people, the enslavement of Black people, and the systematic denial of suffrage and civil rights to American Indian, Black, and other people of color. San Francisco has participated in this national legacy by creating or enforcing laws, policies, actions, and institutions that have perpetuated racial discrimination and led to disparate outcomes for American Indian, Black, and other people of color (see Figure 11). In San Francisco land use, racial discrimination is evident in the City's 1870 Cubic Air Ordinance and 1880 Laundry Ordinance which targeted San Francisco's Chinese population by limiting where they could live or work. In the 20th Century, housing discrimination in San Francisco occurred through direct government action such as [urban renewal](#) or redevelopment and through a failure of the City to act to provide equal protection to all San Francisco's residents in the face of private instruments of racial discrimination including bank [redlining](#) (see Figure 12), [racial covenants](#), and predatory subprime loans. Furthermore, the City has at times directly removed targeted communities from their homes through local use of eminent domain or stood quietly by while federal actions like WWII Japanese American incarceration unjustly targeted San Francisco citizens based on their race. Lastly, the majority of American Indian people who live in San Francisco today are here due to the Indian Relocation Act of the 1950s.¹³ This policy removed American Indian peoples from their reservations and relocated them to cities nationwide. The policy enticed American Indian youth to come to seven large urban areas, including the San Francisco Bay, with promises of job training, housing, and stipends. The promises often fell short; checks did not arrive, job training was for menial labor, and people were housed in inferior housing, separated from their families and extended tribal communities. The cumulative effects of these discriminatory acts have contributed to the economic oppression that pushed and continues to push American Indian, Black and other people of color out of San Francisco. As a result, American Indian, Black, and other people of color continue to face significant income inequality, poor health outcomes, exposure to environmental pollutants, low homeownership rates, high eviction rates, and poor access to healthy food, quality and well-resourced schools, and infrastructure.

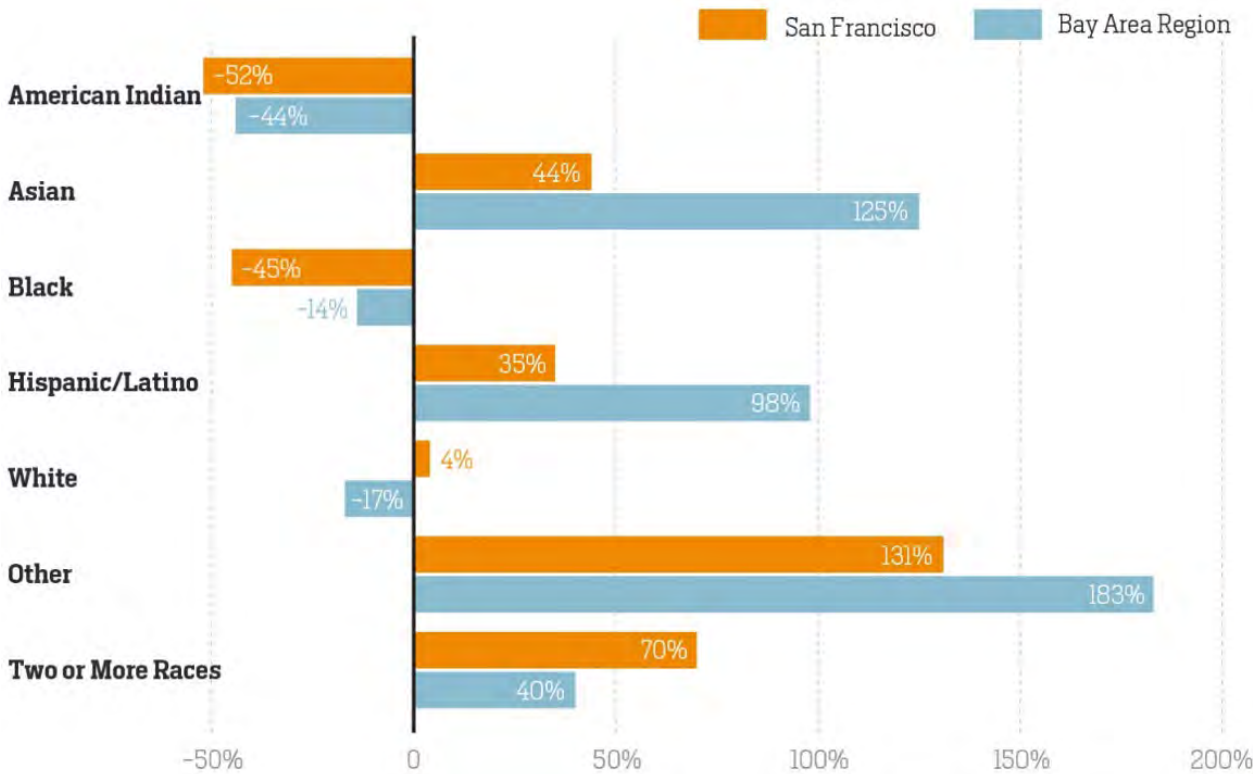
Path Forward - San Francisco has a role to play in redressing the compounding effects of racial discrimination against American Indian, Black, and other people of color perpetuated at all levels of government and throughout American society. While federal action is required to redress the harms of American Indian genocide or the enslavement of Black people, San Francisco can incrementally work towards healing these deep wounds and the disparities that have resulted from centuries of oppression. The San Francisco Planning Commission passed a [resolution](#) on June 11, 2020, that acknowledges and

13 SF Human Rights Commission. Discrimination by Omission: Issues of Concern for Native Americans in San Francisco. August 23, 2007. Accessed online March 16, 2022 at: https://sf-hrc.org/sites/default/files/Documents/HRC_Publications/Articles/Discrimination_by_Omission_Issues_of_Concern_for_Native_Americans_in_San_Francisco.pdf

apologizes for the history of racist, discriminatory, and inequitable planning policies and practices that have resulted in racial disparities. The resolution provides direction for the Planning Department to develop proactive strategies to address and redress structural and institutional racism. The resolution explicitly directs the Planning Department to redress the consequences of government-sanctioned racial harm via meaningful City-supported, community-led processes.

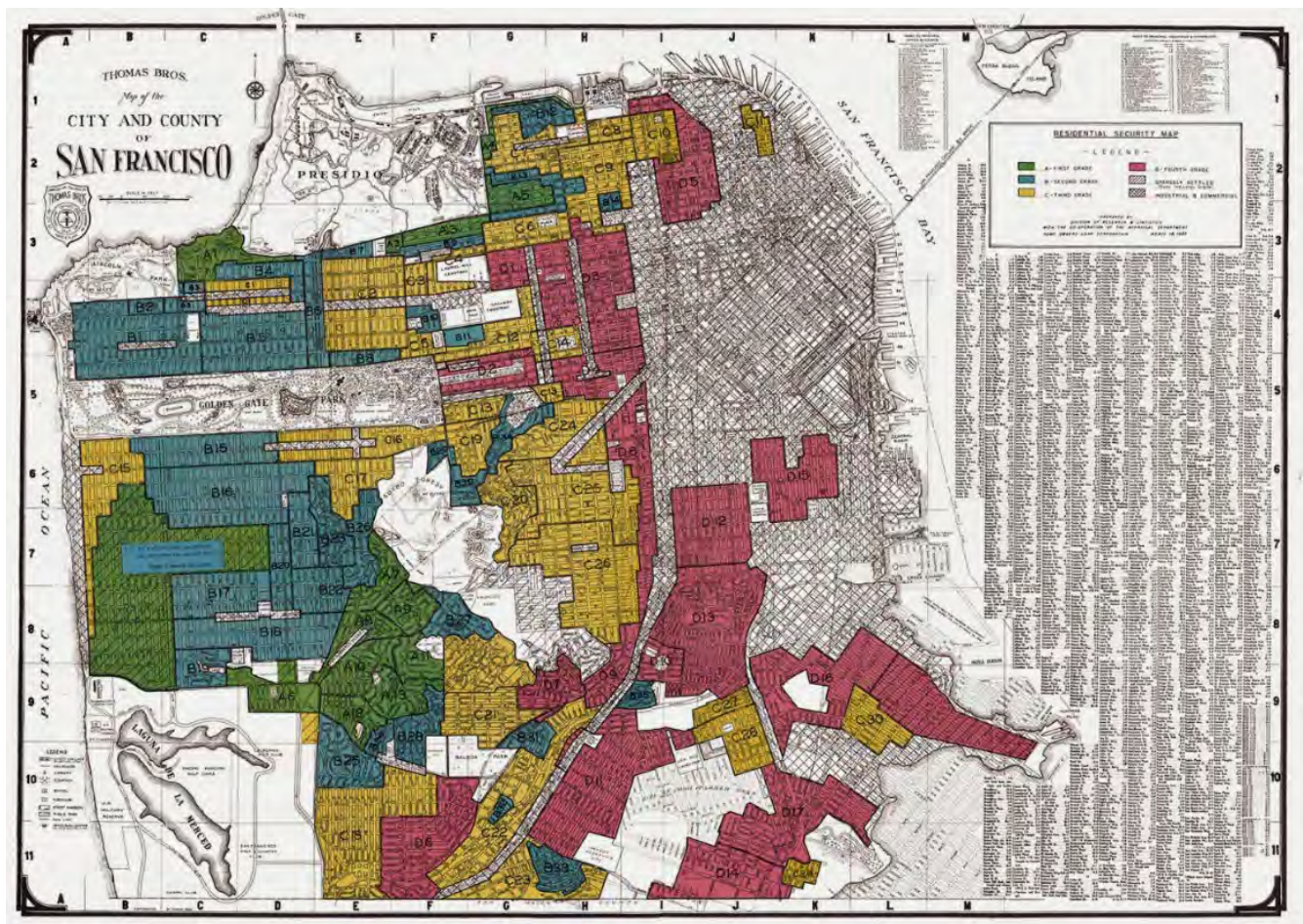
To advance this transformative work, the City must deepen its understanding of the direct harm that discriminatory housing programs and policies caused to American Indian, Black, Japanese, Filipino, and other communities of color in San Francisco. It must also understand the multiple ways in which broader mechanisms of racial and social discrimination reduce a person’s access to housing, such as job discrimination or racial disparities within the criminal justice system. The City must actively dismantle these discriminatory policies by reallocating resources to increase housing access, financial stability, economic opportunities, and community building investments for these communities. Lastly, the City must remain accountable to these communities and transparent in the processes it undertakes to redress harm.

Figure 11. Percentage change of population by race and ethnicity from 1990 to 2015.



Source: 1990 Decennial Census (IPUMS-USA); ACS 2015 5-year Estimates (IPUMS-USA).

Figure 12. Redlining map shows in red neighborhoods that were discriminated for home and improvement loans.



Source: The University Of Richmond's Mapping Inequality Project.

OBJECTIVE 2.A

MAKE AMENDS AND INFORM REPARATIVE ACTIONS BY TELLING THE TRUTH ABOUT DISCRIMINATORY ACTIONS AND THE RESULTING HARM

Challenge - Throughout history, communities of color have been the targets of federal, state and locally sponsored and supported programs which have segregated neighborhoods, displaced, and stripped wealth from communities, and undermined their general health and well-being. The impact of these discriminatory actions on American Indian, Black and other communities of color has yet to be fully documented or understood. While historians have described national events such as the Japanese Internment Bill of 1942 or the Indian Relocation Act of 1956, or government endorsed practices such as [redlining](#) (see Figure 12), [racially restrictive covenants](#), and [urban renewal](#), the City needs to study and understand how these actions specifically impacted the residents of San Francisco in order to take reparative action. The City cannot make amends or take steps to repair past harm without identifying the persons who suffered these acts of discrimination and, by speaking with them, documenting the nature and magnitude of the harm. In many cases, this will mean tracking how harm to an individual

repercussed through generations and communities. This level of investigation and documentation, centering the voices of the American Indian, Black and other communities of color, has been limited in San Francisco to date. For example, the Planning Department has constructed historical narratives to explain segregation in public housing or development patterns resulting from [redlining](#) and [urban renewal](#) to inform the department's regulatory review; however, the department is only just beginning to apply this information in a reparative framework to ask, "What actions must we take as a department and a city to redress the harm that resulted from these events?" This is a challenging and urgent task because truth-telling will necessarily rely on oral histories to reveal the largely undocumented stories of impacted communities, and first-hand accounts of these events will become rarer as members of those communities pass on. Moreover, the opportunity to repair harm for those individuals will be lost.

Path Forward - To begin to repair and redress the harm, it is crucial that the City undergoes a truth-telling process to acknowledge the impacts government-sanctioned actions that led to wealth loss, disparate housing outcomes and displacement in the American Indian, Black, Japanese, Filipino and other communities of color. This process of investigation, documentation, and acknowledgment is essential for establishing accountability, raising consciousness, and informing the mechanisms and magnitude of resources required to repair the harm. The City must support the affected communities to lead this investigation and documentation, and acknowledgement of harms and their disparate outcomes must be communicated at all levels of power. This truth-telling can illuminate how City agencies build programs that are harm reductive, culturally competent, accessible, and that do not reproduce racist practices from the past. Lastly, truth-telling can begin to correct the erasure from the historic record, both in its written form and in the city's built-form, that these communities have suffered.

OBJECTIVE 2.B

OFFER REPARATIONS FOR COMMUNITIES DIRECTLY HARMED BY DISCRIMINATORY ACTION AND BRING BACK THEIR DISPLACED PEOPLE

Challenge - Racial discrimination has led to disparate outcomes in income for American Indian, Black and other communities of color, leaving them vulnerable to housing insecurity and limiting their ability to build intergenerational wealth. The median income for Black households was \$30,442 in 2018, 23% of median income for a white household, and for American Indian households' median income was \$61,250 (see Figure 13), 46% of a white household's median income. As a result, these communities are far more impacted by displacement as discussed also in objective 2.b. San Francisco has a moral obligation to repair the harms of racial discrimination, especially those harms for which it holds the greatest responsibility. Calls for reparations from the federal government have occurred since the Civil War, but it was only in 2021 that House Resolution 40, first introduced in 1989 to create a commission to study slavery and discrimination and potential reparations, moved out of committee. In California, Assembly Bill 3121 was enacted on September 30, 2020 to establish the Task Force to Study and Develop Reparation Proposals for Black Americans. And in May 2021, San Francisco's Board of Supervisors appointed the city's African American Reparations Advisory Committee, described as the first body of its kind to create a comprehensive reparations plan for Black Americans.

Path Forward - The City can build on current and past local and state initiatives to pursue reparations for American Indian, Black, as well as Japanese American and Filipinos harmed by government actions to

create local programs that use housing as tool of repair that addresses persistent housing disparities for these groups and continued community displacement. Reparative acts through housing tools targeted to harmed communities could include dedicating land or housing, offering homeownership loans and grants, ensuring access to below market rate units, facilitating communal forms of land or housing ownership, creating pathways for displaced people and their descendants to return, and strengthening and sustaining their cultural anchors, such as businesses, community and cultural centers, and historic sites.

The city should use the [Cultural District program](#) to help anchor and stabilize American Indian, Black and other communities of color by leveraging the community-government partnerships the program has created to lead community planning and guide resource allocation. The program's mandate requires that the City coordinate resources to assist in stabilizing the districts, which house and provide for vulnerable communities facing, or at risk of, displacement or gentrification. Their community-led processes such as their Cultural History, Housing, and Economic Sustainability Strategies (CHHESS) and direct services, provide a culturally competent framework for stabilizing harmed communities and devising ways to bring back their displaced members.

To incrementally repair the harm inflicted on American Indian and Black people throughout our nation's history and to reverse the displacement and overrepresentation in homelessness of American Indian and Black residents, the City should support these groups for homeownership opportunities, rental housing assistance and other housing services programs. Similarly, to address direct displacement caused by government actions, the City will explore implementing the newly passed State Assembly Bill 1584 that expands the [Certificate of Preference program](#) to serve the descendants of households displaced.

The goal of such actions is to erase racial and ethnic disparities across indicators such as homelessness, homeownership, and rent burden, to improve life outcomes for residents in vulnerable communities, and to grow the city's communities of color whose populations have been diminished by displacement. Housing reparative acts should work in concert with more comprehensive local, state, and federal efforts to redress the nation's history of harm against American Indian, Black and other communities of color.

OBJECTIVE 2.C

INCREASE ACCOUNTABILITY TO AMERICAN INDIAN, BLACK AND OTHER COMMUNITIES OF COLOR

Challenge - Limited commitment at the local, state, and federal levels to adequately fund housing programs to meet the City's existing housing need has contributed to profound public frustration and distrust in the agencies that are meant to serve them. In focus groups for the Housing Element with communities of color and vulnerable groups in 2021, participants reported the sense of powerlessness that they have experienced when attempting to access city programs and resources. Participants shared housing-related experiences that have left them feeling unheard, overwhelmed, exhausted, and powerless to improve housing challenges that seem insurmountable. Participants expressed that existing housing programs and systems sometimes contribute to this sense of powerlessness by de-humanizing

already vulnerable community members, and by operating without enough transparency, or accountability to the communities served.

More needs to be done to improve information sharing with the public about why their needs are not being met, how decisions are being made, and why resources have been inadequate. Unmet housing needs for low-income people are the norm around the state and nation as represented by only one Section 8 voucher available for every four qualified households, and very-low-income renters everywhere face cost burdens and a scarcity of affordable housing. Locally, hundreds of households apply for each new affordable housing unit (see Figure 14). American Indian, Black and other people of color are disproportionately impacted by the failure to adequately fund our housing systems. These are the same communities that are most marginalized from the electoral process and therefore, have fewer means to impact political and government decisions regarding housing policy and resource allocation and to hold those in power accountable to their needs. Likewise, communities of color have not been sufficiently elevated in the City's outreach and engagement efforts or adequately represented in decision-making bodies, further marginalizing their voices.

Path Forward - The City must create systems of accountability that empower American Indian, Black and other communities of color with the knowledge and means to effect positive change for their communities. Elevating the voices of communities of color and other marginalized groups will require that the City proactively support community-based organizations in leading community engagement, and planning. Working with community organizations that serve American Indian, Black and other people of color will help expand access to housing programs and ensure that new policies and larger programmatic changes effectively meet the housing needs of these communities. Outreach and engagement processes should be community-led, culturally appropriate, long-term, and with clear expectations about the outcome of the engagement. Whenever possible, the time and knowledge shared by community advisors should be compensated. Elevating the voices of communities of color also means increasing representation of American Indian, Black, and other people of color in advisory and decision-making bodies.

Improving accountability to advance racial and social equity in housing outcomes will require identifying priorities in this housing plan. While the City needs to significantly expand its resources, priority actions will guide City agencies to prioritize their existing limited resources into actions that carry the highest impact in serving the needs of communities of color, and improving housing affordability for all. Working with bodies and organizations that represent American Indian, Black, and other Communities of color, such as the Community Equity Advisory Council, the African American Reparations Committee, or Cultural Districts, the City will update those priorities frequently, and report on their performance. This process will equip communities of color with more knowledge of the functions and performance of housing programs and policies and the means to hold agencies accountable and support efforts to hold greater power in the decisions that affect their communities. The dissemination of information to and capacity building with American Indian, Black, and other communities of color should expand access to housing programs and result in more effective policies and strategies for meeting the housing needs of their communities.

Additionally, transparent processes and interagency coordination will support the City to continuously identify the funding gaps to implement those priorities and inform the City's budgeting process. A new racial and social equity analysis framework will help evaluate the impact of the Housing Element's









policies and programs to ensure timely adjustments to increase accountability and effectiveness in advancing racial and social equity. This new framework will include metrics to evaluate progress, and investment solutions to prevent and reverse adverse impacts and to advance equity. Overall, these new tools should make possible a healthier democratic system in which the needs of all residents are more equitably addressed.

Figure 13. Median household income by race and ethnicity (2018).

SAN FRANCISCO	\$104,552
American Indian / Alaskan Native	\$61,250
Black or African American	\$30,442
Hispanic or Latino/e/x (Any Race)	\$72,578
Native Hawaiian and Other Pacific Islander	\$76,333
Some Other Race	\$ 59,497
Two or More Races	\$114,399
White (Non-Hispanic)	\$132,154

Source: ACS 2018 5-year Estimates (IPUMS-USA).

Figure 14. Below Market Rate Rental Applicants vs Occupants by Race and Ethnicity.

Demographics for BMR Rentals*		
589 units (new and re-rental)	Applicants	Occupants
 American Indian or Alaska Native	1,818	4
 Asian	36,301	214
 Black or African American	19,045	71
 Hispanic or Latino	28,005	140
 Native Hawaiian or Other Pacific Islander	1,710	6
 White	18,392	90
 Other or Multi-Racial	6,597	24
 Unknown	8,169	51
Total	120,037	602

Source: 2019-2020 MOCHD Progress Report

Goal 3.

Foster racially and socially inclusive neighborhoods through equitable distribution of investment and growth.

Challenge - Racial and economic segregation is defined by the UC Berkeley Othering and Belonging Institute (OBI) as “an attempt to deny and prevent association with another group, and a strategy that institutionalizes othering of racial or social groups through inequitable resource distributions.”¹⁴

Racial concentrations overlapped with concentration of low-income households are strongly visible in San Francisco (Mission, Fillmore and Bayview, Chinatown, SoMA) indicating segregated living patterns (Figure 15). Many of these neighborhoods have hosted most of the new growth, with 85% of new housing built since 2005 concentrated in the eastern and central parts of the city: Downtown/South Beach, SoMa, Mission Bay, Potrero Hill/ Dogpatch, Bayview Hunters Point, the Mission, Tenderloin, and Hayes Valley (see Figure 16). While these investments in housing development brought new infrastructure, jobs, and residents to the east side, many lower income communities of color were locked out of access to these benefits and are still contending with the lingering effects of discrimination that make them more vulnerable to homelessness, evictions, and displacement. At the same time, well-resourced neighborhoods with greater access to parks, quality schools, better environmental conditions, and with higher median incomes have experienced the lowest rates of new housing development over the last few decades. Multi-family homes in these neighborhoods are either not currently allowed or zoning restrictions render them too expensive to deliver. These restrictions have the effect of excluding low- and moderate-income households from being able to live in these neighborhoods and in that way serve to maintain racial and economic segregation in San Francisco (see Figure 17).

Path Forward - A new state law, [Affirmatively Furthering Fair Housing \(AFFH\)](#), requires that all public agencies administer programs and activities related to housing and community development in a manner that promotes fair housing. Affirmatively furthering fair housing means “taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity.”¹⁵ The California Department of Housing and Community Development (HCD) prescribes that in order to prevent further segregation and concentration of poverty, and to increase access to opportunity and redress past actions that led to current inequities, city agencies and decision-makers “must create land-use and funding policies to increase affordable housing in high resource neighborhoods that have often been exclusionary (explicitly or indirectly due to costs or zoning policies) and bring additional resources to traditionally under-resourced neighborhoods.”¹⁶

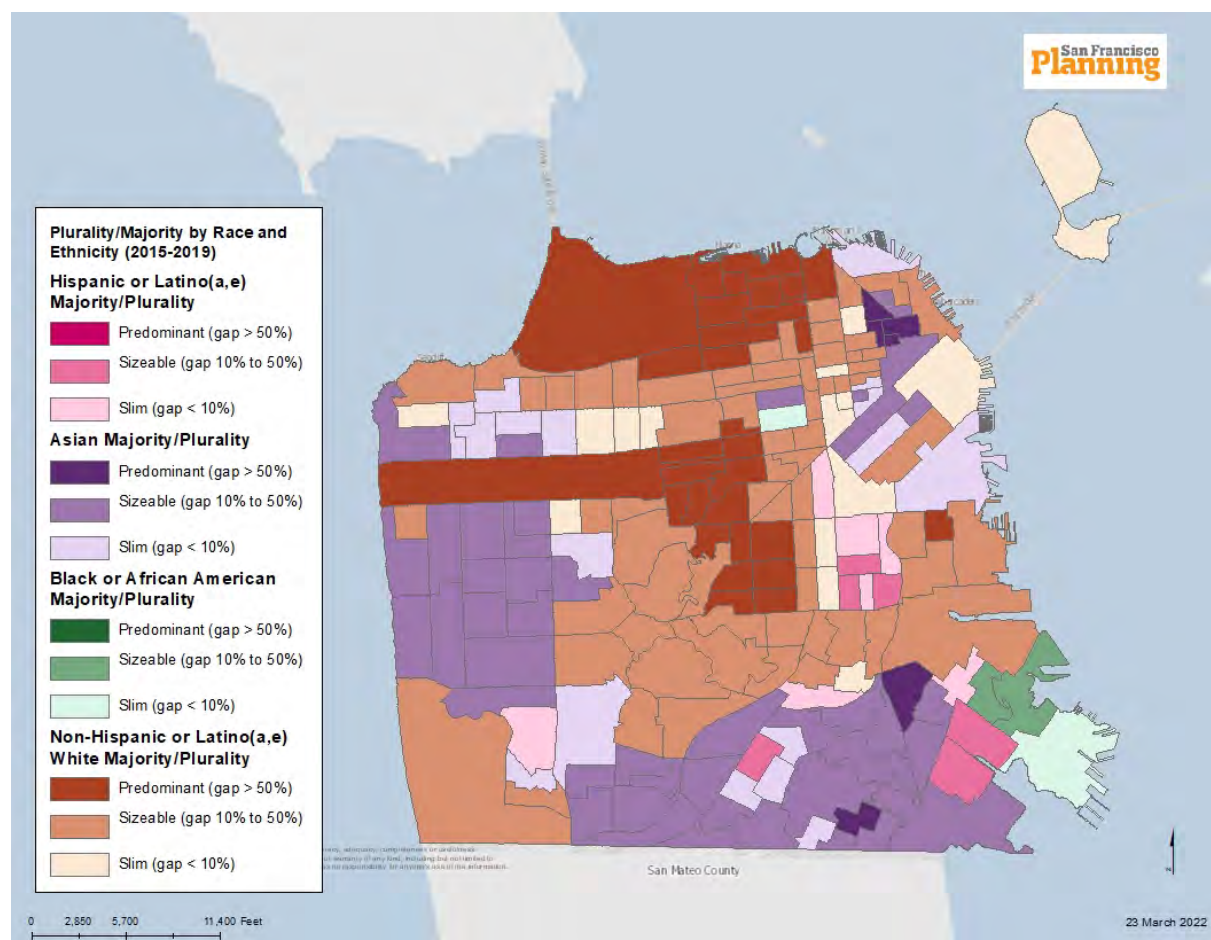
14 <https://www.otheringandbelonging.org/the-problem-of-othering/>

15 AB 686 https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201720180AB686

16 https://www.hcd.ca.gov/community-development/affh/docs/affh_document_final_4-27-2021.pdf#page=16

The goal of greater integration, and racially and socially inclusive neighborhoods, relies on building intergenerational wealth within areas¹⁷ with high concentration of American Indian, Black, or other communities of color. This goal requires the City to ensure low-income communities and communities of color can also benefit from investment in housing, including the opportunity to build wealth. The goal also requires the City to open wealthy, white, and well-resourced neighborhoods to all communities of color and low-income households in order provide access to high-quality neighborhood resources that foster positive economic and health outcomes. To prevent further inequities as an unintended impact of investments, targeted anti-displacement investments are needed to stabilize existing racially and socially inclusive communities.

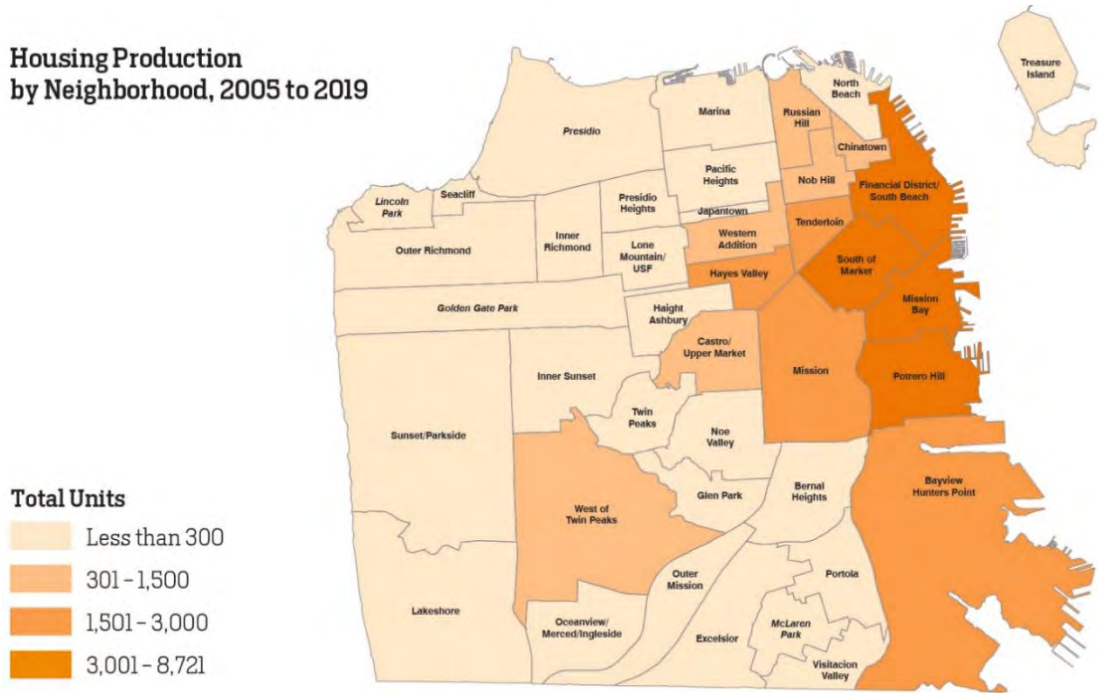
Figure 15. Map of predominant racial and ethnic concentrations and Racially and Ethnically Concentrated Areas of Poverty (R/ECAP) (2017).



Source: Esri, Predominant Race/Ethnicity by Block Group, 2013-2017 (2013-2017 American Community Survey 5 Year)

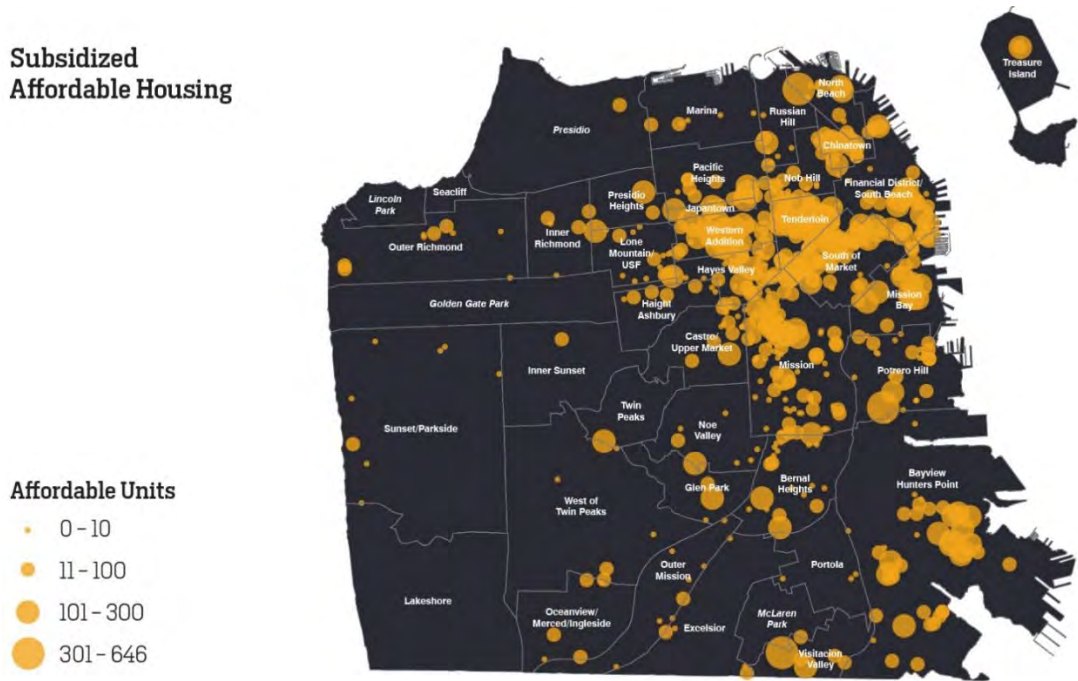
17 Ibram Kendi, "How to Be an Antiracist" (One World, August 13, 2019).

Figure 16. Map of housing production by neighborhood from 2005 to 2019.



Source: San Francisco Housing Affordability Strategies (2020).

Figure 17. Map of permanent affordable housing by units per building (2018).



Source: San Francisco Housing Affordability Strategies (2020) with data from the San Francisco's Mayor's Office of Housing and Community Development (2018).

OBJECTIVE 3.A

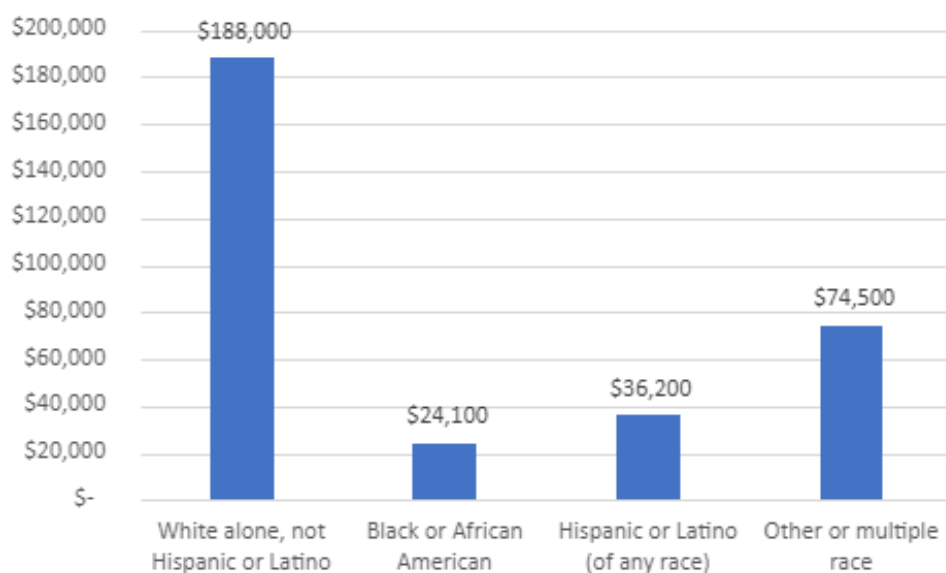
BUILD INTERGENERATIONAL WEALTH FOR AMERICAN INDIAN, BLACK, AND OTHER COMMUNITIES OF COLOR.

Challenge - Government actions in the form of [redvelopment and urban renewal](#) have dispossessed specific communities in San Francisco, such as American Indian, Black, Japanese, Filipino, and other communities, of homes and entire neighborhoods. The median household wealth (the difference between total assets and total debts) for white households is more than five times greater than Latino/e/x households and more than seven times greater than Black households (see Figure 18). Income data from San Francisco echoes these national trends (see Figure 13). The median income for Black households is less than one fourth of non-Hispanic white households. Similarly, the median household income for American Indians (\$61,250), Latinos/es/x (\$72,578), and Asians (\$88,016) was also lower than non-Hispanic white households.

These wealth gaps have left households of color more likely to experience housing instability and cycles of intergenerational poverty, and often unable to build wealth to pass down to their children over decades. Wealth allows people and families to secure safe and healthy housing, open businesses, sustain themselves in retirement, and facilitate education and access to homeownership for their children. Homeownership is one of the primary sources of building wealth for most U.S. families. But decades of lost opportunity due to housing discrimination and neighborhood disinvestment, along with educational and workplace discrimination, have locked many people of color out of homeownership and contributed to the racial wealth gaps we see today. While some neighborhoods with the high concentration of low-income American Indian, Black, and other communities of color in San Francisco have experienced significant housing and infrastructure investments in the past two decades, these communities have experienced limited benefits and, in some cases, experienced displacement of residents and businesses. In addition, these low-income communities of color have had limited access to the new permanently affordable housing units due to income or credit requirements beyond their reach.

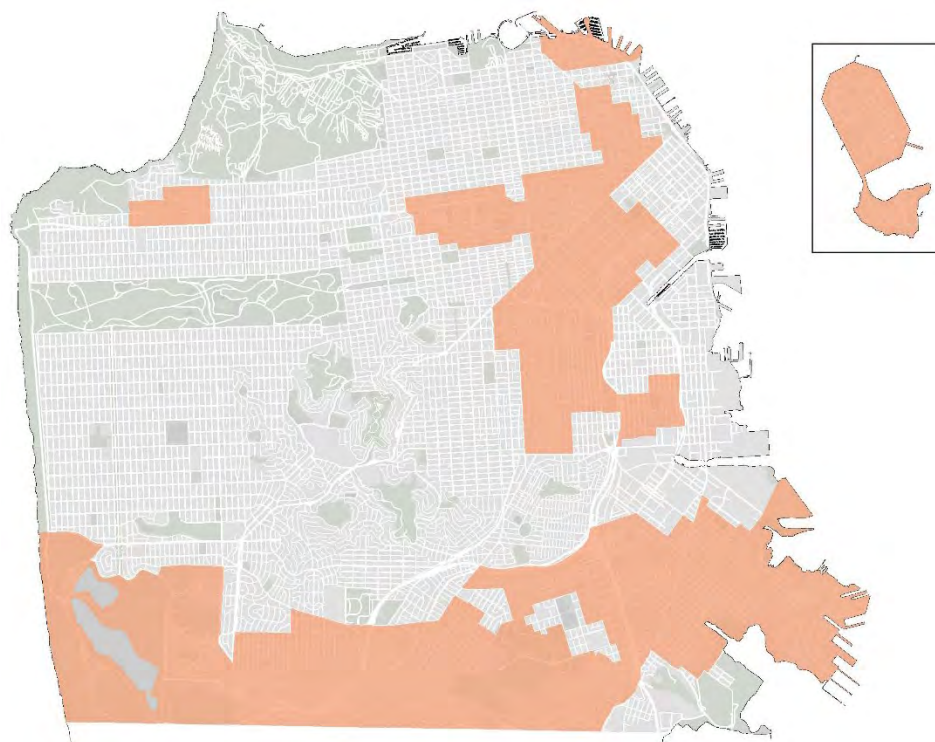
Path Forward - Racially and socially inclusive neighborhoods rely on low-income American Indian, Black, and other communities of color having the opportunity to build wealth to pass on to future generations. This Housing Element defines [Priority Equity Geographies](#), as places where the city will target direct investments to achieve this outcome and implement reparative strategies described in the previous goal (see Figure 19). Wealth building strategies should start with a people-based approach and include access to affordable housing and homeownership, as well as trainings for well-paid jobs, business ownership, and fostering financial literacy and readiness. Wealth building strategies will also include place-based strategies to improve access to opportunity: resources in one's neighborhood that are linked to positive economic, social and health outcomes for communities, such as quality public schools, affordable and accessible transportation options that connect residents to educational and economic development opportunities, affordable community serving businesses, and a healthy environment. These resources create the conditions for thriving neighborhoods that, along with people-based approaches, can build lasting wealth that can be passed on from one generation to the next.

Figure 18. National median household wealth (2019).



Source: [US Federal Reserve \(2019\)](#)

Figure 19. Map of Priority Equity Geographies



Source: San Francisco Department of Public Health's [Areas of Vulnerability map](#).

Note: Priority Equity Geographies are areas with a higher density of vulnerable populations as defined by the San Francisco Department of Health, including but not limited to people of color, seniors, youth, people with disabilities, linguistically isolated households, and people living in poverty or unemployed.

OBJECTIVE 3.B

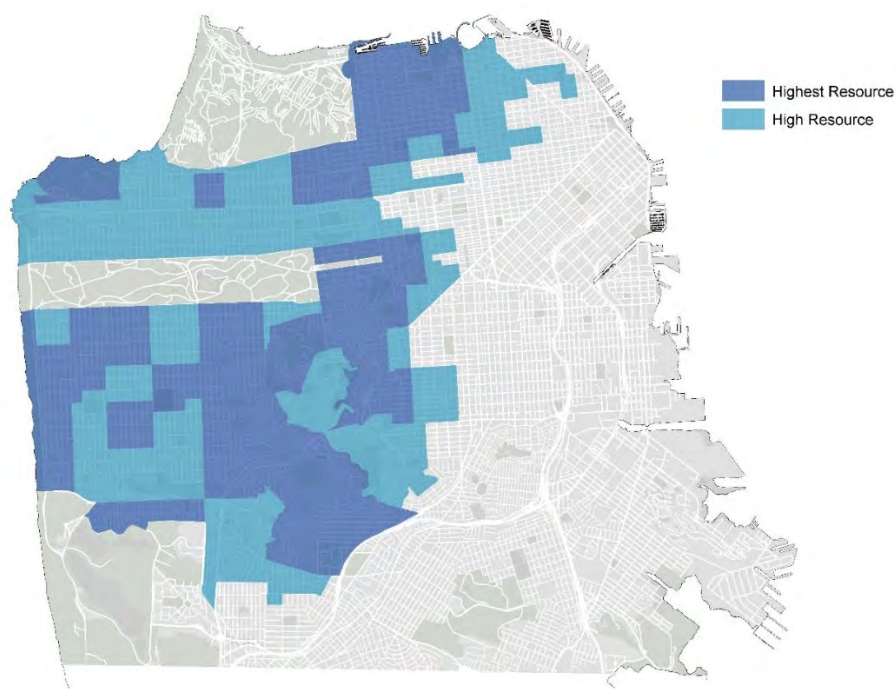
CREATE A SENSE OF BELONGING FOR ALL COMMUNITIES OF COLOR WITHIN WELL-RESOURCED NEIGHBORHOODS THROUGH EXPANDED HOUSING CHOICE

Challenge - [Well-resourced Neighborhoods](#) are areas the state has identified in each jurisdiction as places that have a high concentration of resources that have been shown to support positive economic, educational, and health outcomes for low-income families — particularly long-term outcomes for children (see Figure 20). Since 2005, just 10% of all new housing in San Francisco and 10% new affordable housing has been built in [Well-resourced Neighborhoods](#) though these areas cover nearly 52% of the residential land in the city (see Figures 16 & 17). In part this is because 65% of land in these areas is limited to one or two units and most of the rest also has fixed restrictions on the number of units allowed- even near major commercial districts and transit lines (see Figure 21). This pattern of development has had a two-fold effect on low-income communities and communities of color which mostly reside outside of these neighborhoods. First, these communities disproportionately carry the burden of accommodating growth in our city. Second, a lack of new housing, particularly affordable housing, in neighborhoods with better services and amenities means those neighborhoods remain largely inaccessible to low-income communities and communities of color.

Current restrictions on the number of homes that can be built on most of the city's residential land date largely to the 1970s, when the city faced a substantially different housing context. The city had lost population from 1950 to 1980 as many middle- and high-income households, who were typically white, moved to rapidly growing suburban communities of single-family homes. Jobs were also growing quickly in suburban areas including manufacturing, logistics, and new suburban office parks. The amount of housing produced regionally was significantly higher than today and housing costs were lower to what people earned at the time. These zoning changes from the 1970s often were an indirect way to institutionalize and perpetuate racial and social exclusion from affluent, white neighborhoods in San Francisco. These practices and regulations are known as [exclusionary zoning](#).

Path Forward - Fostering racially and socially inclusive neighborhoods throughout the city means increasing housing choice for all in all neighborhoods. It means ensuring access to housing for American Indian, Black, and other communities of color across all neighborhoods. To promote a sense of belonging for all communities in [Well-resourced Neighborhoods](#), the City needs to shift course regarding where new housing is built, so more diverse communities can call these neighborhoods home. The new [Affirmatively Furthering Fair Housing Law](#) also requires local jurisdictions to create programs that would reverse segregation and promote inclusive neighborhoods, including allowing for more housing, particularly affordable housing, to be built in [Well-resourced Neighborhoods](#). Increasing housing development capacity through changes to zoning in [Well-resourced Neighborhoods](#), focusing on small- to mid-rise multifamily buildings is the first step the City must pursue to shift development patterns. Increasing housing choice in these areas also will rely on incentives and community benefits in order to provide housing choices affordable to not just to low-income residents, but also to middle-income residents, families with children, seniors and people with disabilities. Opening access to housing choices in the [Well-resourced Neighborhoods](#) must be supplemented with strategies to foster openness to new neighbors, support to those previously excluded in accessing new neighborhoods, and financial strategies for affordable housing.

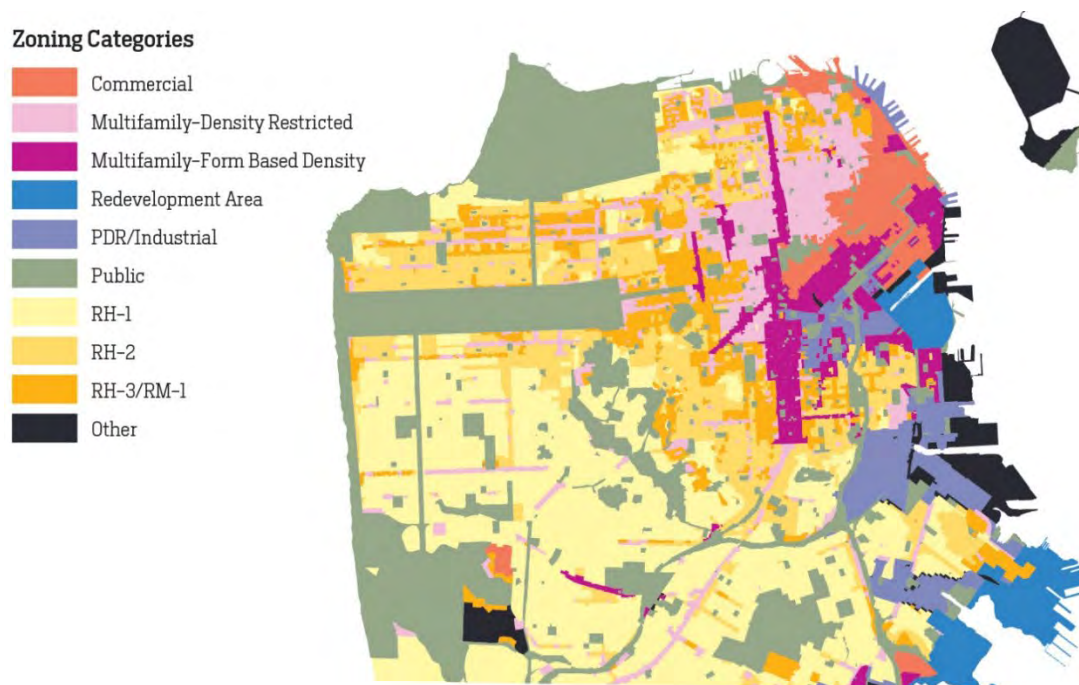
Figure 20. Map of Well-resourced Neighborhoods



Source: [2020 TCAC/HCD Opportunity Map](#).

Note: Well-resourced Neighborhoods are shown below and defined as “High Resource/Highest Resource” by the [California Fair Housing Task Force](#). The purpose of this map is to identify every region of the state whose characteristics have been shown by research to support positive economic, educational, and health outcomes for low-income families—particularly long-term outcomes for children.

Figure 21. Map of simplified zoning categories for the Housing Affordability Strategies analysis.



Source: San Francisco Housing Affordability Strategies.

OBJECTIVE 3.C

ELIMINATE DISPLACEMENT OF VULNERABLE COMMUNITIES AND COMMUNITIES OF COLOR

Challenge - Due to social and economic inequities, low-income households and households of color are particularly vulnerable to displacement. The impacts of displacement, the involuntary or forced movement of households due to causes outside of the household's ability to control on communities are deep and destabilizing. Members of displaced communities report feelings of loss, anxiety, and fear,¹⁸ experience the disintegration of social fabrics,¹⁹ face greater food insecurity,²⁰ and self-report poorer health outcomes.²¹ In San Francisco, economic booms are often accompanied with an increase in eviction rates (see Figure 22).

Eviction notices are only one metric to measure displacement. The Urban Displacement Project has measured displacement through a variety of social and economic indicators (see Figure 23),²² including new metrics such as in and out migration to neighborhoods.²³ Displacement constitutes not only loss of people but also cultural heritage, businesses and services, and social networks, all of which provide vital spaces for immigrants, transgender and LGBTQ+ residents, people of color, and other groups. These resources are also essential to the fabric of San Francisco. Displacement is more likely to occur in neighborhoods with high populations of seniors, low-income households, and Black, American Indian, and other communities of color, making these populations even more vulnerable and disadvantaged. Studies have suggested that major infrastructure improvements, such as new rail or major transit investments, could result in displacement impacts if parallel anti-displacement investments have not been made.²⁴ Low-income communities of color also have expressed concerns about displacement due to rental and price adjustments which can occur along with major zoning changes, or major new market-rate buildings. At the same time neighborhoods without such investments have also experienced high eviction rates and have been identified as [vulnerable to displacement, such as places in the](#) Richmond and Sunset.

Path Forward - Preventing further displacement is key to the goal of racial and socially inclusive neighborhoods as it contributes to greater neighborhood and individual stability and cultivates culturally

18 Atkinson, Rowland, Maryann Wulff, Margaret Reynolds, and Angela Spinney. "Gentrification and displacement: the household impacts of neighborhood change." AHURI Final Report 160 (2011): 1-89.

19 Betancur, John. "Gentrification and community fabric in Chicago." Urban studies 48, no. 2 (2011): 383-406.

20 Whittle, Henry J., Kartika Palar, Lee Lemus Hufstедler, Hilary K. Seligman, Edward A. Frongillo, and Sheri D. Weiser. "Food insecurity, chronic illness, and gentrification in the San Francisco Bay Area: an example of structural violence in United States public policy." Social science & medicine 143 (2015): 154-161.

21 Izenberg, Jacob M., Mahasin S. Mujahid, and Irene H. Yen. "Health in changing neighborhoods: A study of the relationship between gentrification and self-rated health in the state of California." Health & place 52 (2018): 188.

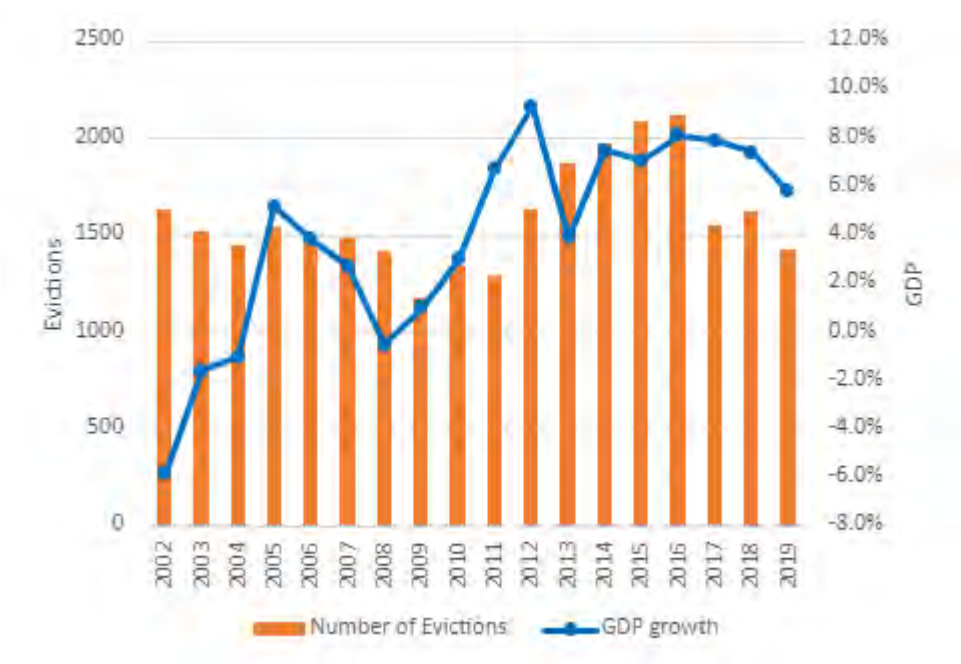
22 Social and economic indicators include: household income, change in household income, housing costs, rent increases, and housing affordability

23 Chapple, K., & Thomas, T., and Zuk, M. (2021). Urban Displacement Project website. Berkeley, CA: Urban Displacement Project.

24 Zuk, Miriam, Ariel H. Bierbaum, Karen Chapple, Karolina Gorska, and Anastasia Loukaitou-Sideris. "Gentrification, displacement, and the role of public investment." Journal of Planning Literature 33, no. 1 (2018): 31-44.

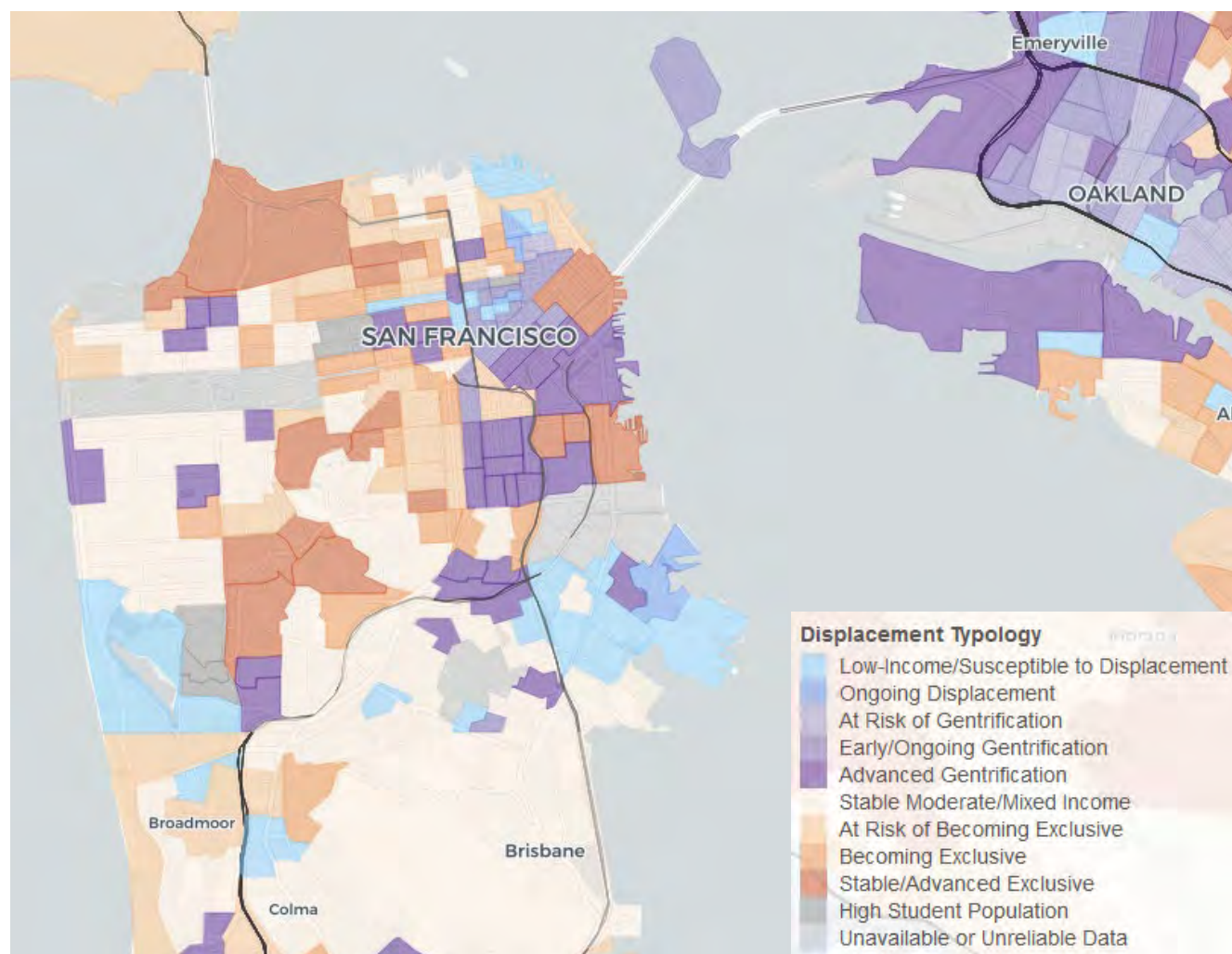
appropriate commercial and social spaces for the most vulnerable communities. The City must understand and measure displacement impacts more clearly and directly to prevent further displacement. Upcoming analyses will identify metrics to measure displacement, especially in [geographies identified as vulnerable to displacement](#). The findings of that analysis will inform anti-displacement investments that will ameliorate, and ideally reverse the displacement impacts. Anti-displacement investments include funding eviction defense programs, such as right to counsel and tenant rights education, bolstering and enforcing existing eviction protections and rent stabilization laws, and providing relief through emergency or targeted rent subsidies, as well as medium- to long-term investments such as preservation of affordability of existing housing that primarily house low-income households and households of color, and building new permanently affordable housing targeted to [communities vulnerable to displacement](#).

Figure 22. GDP growth and eviction notices in San Francisco from 2002 to 2019.



Source: San Francisco Rent Board, US Bureau of Economic Analysis

Figure 23. San Francisco Bay Area gentrification and displacement map.



Source: San Francisco Bay Area Gentrification and Displacement Map, Urban Displacement Project; accessed in January 2022.

Goal 4.

Provide sufficient housing for existing residents and future generations for a city with diverse cultures, family structures, and abilities.

Challenge - San Francisco has been in a state of affordability crisis in the past couple of decades, a crisis felt by low-, moderate-, and, more recently, middle-income households. Current residents or workers wanting to call San Francisco home cannot afford the housing they need. While this crisis is fueled by the consistent housing shortage throughout the state, San Francisco has become one of the least affordable cities in the nation. The median condominium price of \$1.2 million is affordable to households making \$222,000 annually. Less than 25% of San Francisco households earn this income and less than 10% of San Francisco workers have this salary. In 2022, median rent was \$3,800 for a 2-bedroom apartment, affordable to a household earning \$137,000, that is less than 40% of our households.

During the economic boom of the last decade, the city attracted major job growth particularly high salaried jobs. The increasing demand for city living by high earning households, along with historic low housing production rates drove up the rental and sales prices (see Figure 24), and triggered waves of displacement especially in low-income communities of color (see Figure 4). This challenge has been compounded by a significant decline of public funding for affordable housing from the Federal and State governments over the past four decades. High housing costs in our region mean that this disinvestment has had an even greater impact. Securing State affordable housing funds has become more competitive recently, and San Francisco does not fare well due to high costs of construction. Staggeringly high costs of housing development also mean that new homes delivered by private investment are only affordable to higher-income earners, further aggravating the affordability crisis. High costs of construction material, skilled labor priced out of living in the region, and complex review and permitting processes, and with increased investment risk all contribute to increases in the cost of building homes.

As the cost of living in San Francisco has ballooned over the years, the city has lost much of the diversity that once defined its identity. Seniors, families with children and middle-wage workers are confronted with very limited choices. Many are forced to find housing choices that meet their needs across the bay or further away and endure long commute hours. Many are forced to leave the Bay Area or California completely. The City has been unable to provide the needed housing for the diversity of workers that our economy requires and most importantly the housing for our diverse cultures and communities that define the essential values of San Francisco.

Path Forward - There has been a growing commitment to address housing scarcity in California. Cities throughout the state are required to facilitate sufficient housing that not only responds to natural population growth but also address existing housing needs. These needs are measured by the share of households who bear high housing cost burden (paying more than 30% of their income on rent), or by those living in overcrowded conditions (more than one person per room, including the living room), or by low rates of available units on the market for rent or sale. San Francisco's [Regional Housing Needs](#)

[Allocation](#) for the 2023-2031 cycle is 82,069 units, over three times the targets of the most recent regional planning cycle (2014-2022) (See Figure 25).

Many studies illustrate the importance of increasing the supply of housing to address the affordability crisis throughout California. New market-rate housing is generally only affordable to high-income earners. In San Francisco, new housing is also mostly limited to certain neighborhoods, and often in certain typologies within high-rise or mid-rise buildings that may not serve families with children, multi-generational living, or seniors.

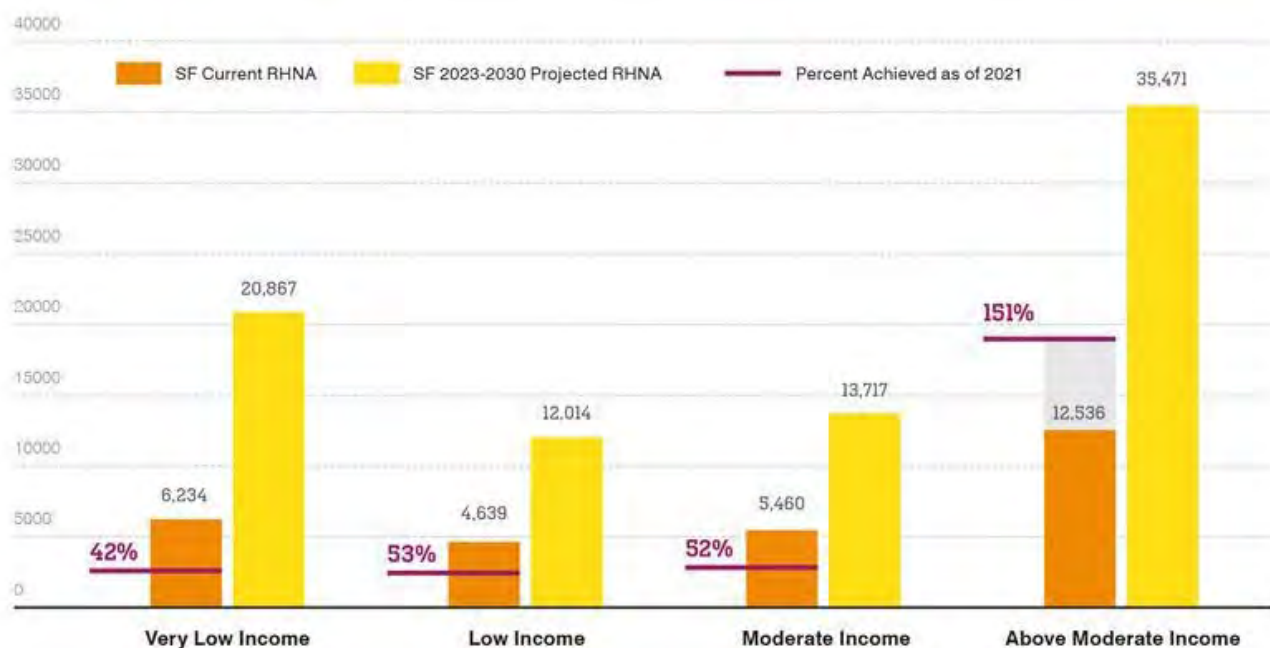
Achieving the goal of providing sufficient housing will require providing an abundance of permanently affordable housing, which requires a substantial increase in public funding. It also means continuing production of market-rate housing for all segments of San Francisco's workforce. It means supporting private investments to build housing for middle-income households. Small and mid-rise multi-family buildings have been a typology that historically played this role without public subsidies or income restrictions. This is a typology that fits the scale of most of San Francisco's neighborhoods, and new strategies can promote the feasibility of these buildings. The City's future diversity also relies on ensuring that new housing responds to the needs of a diversity of cultures, incomes, household types and family structures, age, and abilities.

Figure 24. Percentage change in job growth compared to percentage change in housing unit production from 2010 to 2019.



Source: 2010, 2019 BLS QCEW; ACS 2010 and 2019 1-Year Estimates.

Figure 25. San Francisco Regional Housing Needs Allocation by income level (Cycle 5 vs Cycle 6).



Source: ABAG

OBJECTIVE 4.A

SUBSTANTIALLY EXPAND THE AMOUNT OF PERMANENTLY AFFORDABLE HOUSING FOR EXTREMELY LOW- TO MODERATE-INCOME HOUSEHOLDS.

Challenge - Building housing permanently affordable to people with extremely low- to moderate-incomes requires subsidy to cover the gap between the cost of development and operations and the reduced revenue due to lower rents and prices. Annual affordable housing production has varied from year to year over the past decade, generally following overall housing production (see Figure 26). Federal funding for affordable housing has continually decreased for the past several decades. In the past 15 years, San Francisco has only built or preserved 13,320 units permanently affordable to extremely low- to moderate-income households, 33% of our regional targets. San Francisco also lost a significant and continuous source of funding due to State dissolution of Redevelopment Agencies in 2011. To continue building affordable housing, non-profit developers piece together a variety of public and private funding sources. The City also created new sources of local funding to make up for the loss of redevelopment funds. These include:

- Affordable housing trust fund, established in 2012, a general fund set aside of approximately \$50 million/yr for 30 years.
- Employer gross receipts tax, established in 2018, expected to create \$300 million per year for supportive housing

- Real Estate Transfer tax for properties valued at \$10 million or higher, expected to create \$196 million per year²⁵
- Affordable Housing General Obligation Bonds, \$310 million in 2015, and \$600 million in 2019, and \$147 million in the Health and Recovery G.O. Bond in 2020.

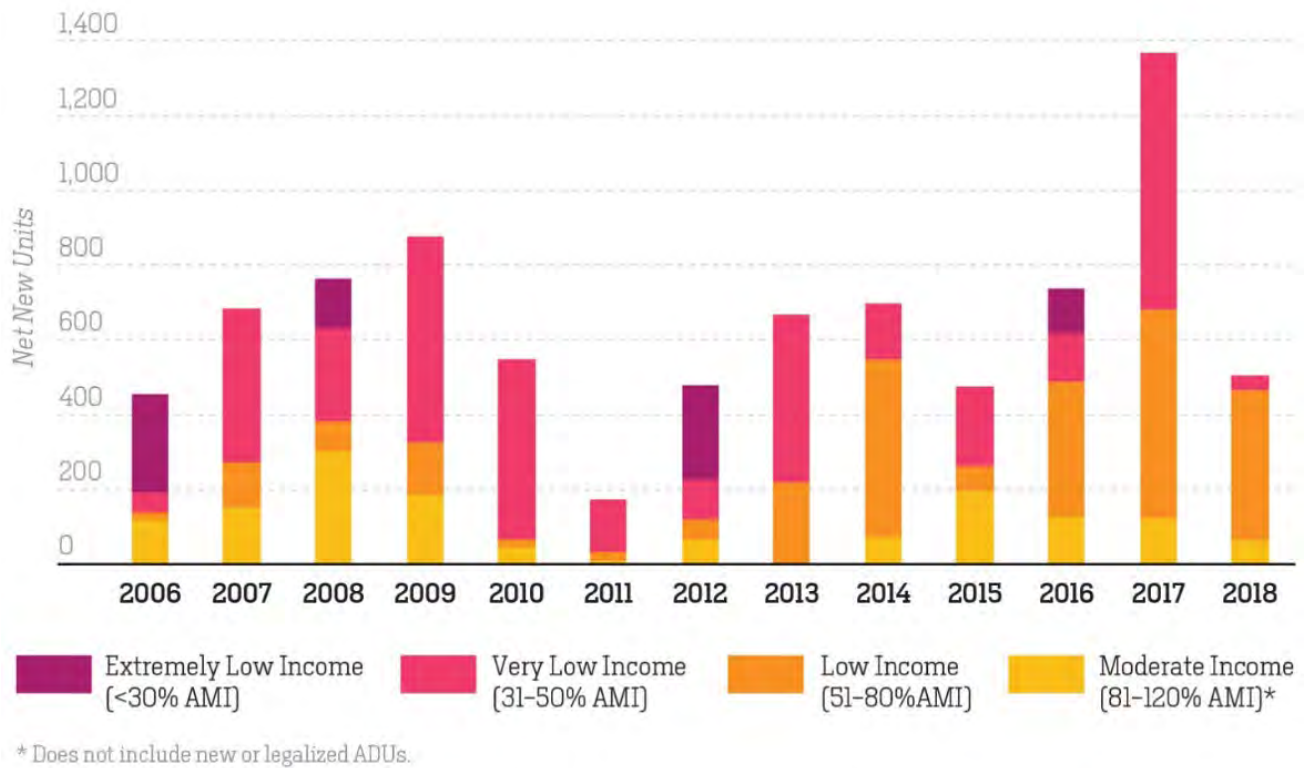
Despite limited funding sources, San Francisco continues to build affordable housing at a faster rate than most other cities. According to the Housing Affordability Strategies report, the City needs to spend over \$517 million per year on building or preserving permanently affordable housing to secure 30 percent affordability of 5,000 new or preserved units (see Figure 27a). This study assumed an average cost of construction of \$700,000 per unit and a subsidy of \$350,000. The City was able to reach the high funding target in 2019. With the additional funding from the new gross receipts tax for Permanent Supportive Housing, the City reached approximately \$650 million in 2021 for production and preservation of affordable housing. However, the new RHNA goals have increased significantly and will require substantially larger investments. Initial analysis shows a significant deficit per year to meet the affordability targets ranging from \$1.3 billion in the 2023 to \$2.5 billion in 2031. This gap also relies on private development providing a portion of our affordable housing units through inclusionary requirements, and contributing to housing related fees such as jobs housing linkage fees.

Path Forward - Substantial expansion of permanently affordable housing for extremely low to moderate-income households is a critical pillar of addressing housing needs and housing our workforce. Without that investment the City will continue to lose its racial, social and cultural diversity. To achieve this objective, the City must seek new paths to substantially expand funding sources for affordable housing whether through new local sources, or expanded State and Federal funding. Figure 27(b) shows projected funding that is fairly certain. The City should utilize the two new sources of funding, gross receipts tax, and the Real Estate Transfer tax, to partially meet our funding gap, and consider new funding sources such as a new affordable housing bond, and other sources to meet the gap. Reducing the cost per unit for building affordable housing is also a critical path forward, which can be possible with streamlined review, and neighborhood support of mid-rise buildings for permanently affordable housing in all neighborhoods. The City will continue and expand streamlined review of all permanently affordable housing, reduce the cost of construction in regulatory review processes, and rely on innovative materials to make more efficient use of limited public funds. The City must also distribute affordable housing investments across all neighborhoods, including investments in Well-resourced Neighborhoods where the production of affordable housing has been limited. Expanding the types of permanently affordable housing beyond non-profit owned and operated or privately-owned below market rate rental units into cooperative housing, shared equity models, and land trusts will expand paths to increase affordable homeownership opportunities. The City must also target its investment to provide permanently affordable housing that serves the particular needs of vulnerable groups, such as transgender and LGBTQ+, transitional-aged youth, seniors and people with disabilities, and families with children. As the City, state and federal governments, continue to expand investment in affordable housing, it is important to recognize the role of private housing developers in building permanent affordable housing, through [inclusionary requirements](#), or affordable housing fees. Beyond the distinct contributions of the

²⁵ This funding source is for the general fund and is subject to annual appropriation. For FY20-21, \$10M of supplemental appropriation was approved for affordable housing

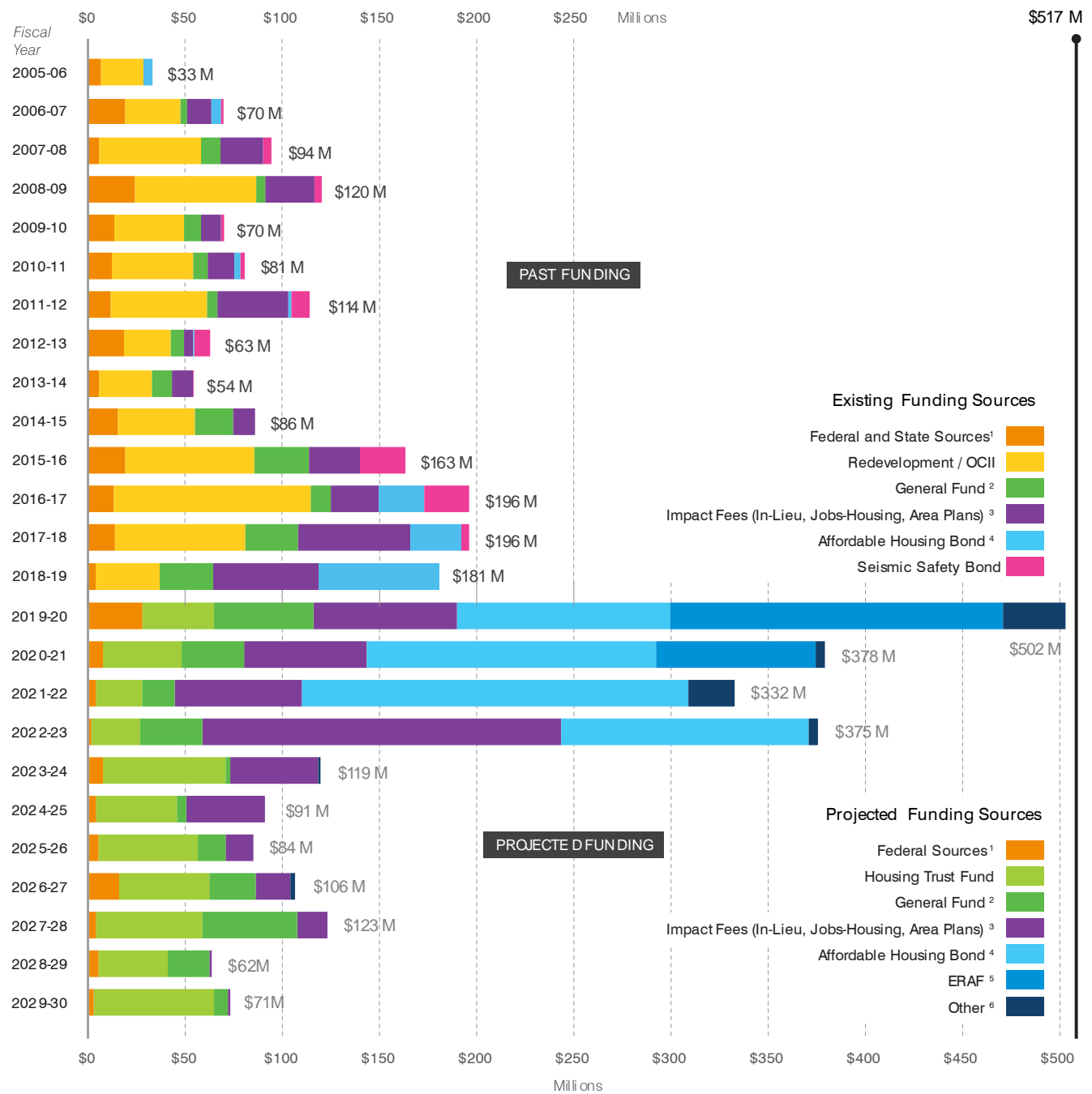
government and private sectors, the City must continue to support public-private partnerships to leverage public funds with private investments to maximize the number of affordable housing units produced.

Figure 26. Affordable housing production by income level from 2006 to 2018.



Source: City of San Francisco Planning Department Housing Inventory Reports, 2006 to 2018; Strategic Economics, 2020.

Figure 27b. Affordable Housing Expenditures by Source Past (2006-2019) and Projected (2020-2030)



Note: OCII will fund about 2,500 new affordable units on specific sites to meet its enforceable obligations in coming years and these units are accounted for in the 50,000 unit, 30-year total. Redevelopment and OCII are included in past expenditures above because they were the main affordable housing funding source. Projected expenditures by funding source shown above and the \$517 million estimate of annual funding need are for MOHCD-funded affordable units and do not include OCII.

(1) Includes HOME and CDBG

(2) Includes land sales and Certificates of Participation (COPs)

(3) Includes area-specific fees, inclusionary housing fees, and jobs-housing linkage fees

(4) Includes 2015 Proposition A and 2019 Proposition A housing bonds In 2019

(5) The Board of Supervisors passed an ordinance to establish the use of excess Education Revenue Augmentation Fund (ERAF) revenue for affordable housing production and preservation

OBJECTIVE 4.B

EXPAND SMALL AND MID-RISE MULTI-FAMILY HOUSING PRODUCTION TO SERVE OUR WORKFORCE, PRIORITIZING MIDDLE-INCOME HOUSEHOLDS.

Challenge - While middle income households in San Francisco were not cost burdened (paying more than 30 percent of their income for housing) at all in 1990 more recent data shows that middle-income households are now cost-burdened (see Figure 3). San Francisco's housing costs are so high that even middle-income households – such as teachers, nurses, or first responders - are increasingly finding it hard to remain in the city. Data from the San Francisco Unified School District, for example, shows that anywhere from 300 to 700 educators leave San Francisco every year, leading to a shortage of teachers. While middle-income households may find rental housing affordable in many neighborhoods, median sales prices are completely out of reach. Middle-income households can find homeownership opportunities more easily across the bay, and that alone presents an incentive to leave the city.

Middle-income households have been increasingly left out as a target for newly built private market housing. While San Francisco has consistently met or exceeded regional housing targets for “above moderate-income households,” this housing is not affordable to middle-income households. Factors contributing to this high cost include: land value, construction material costs, labor shortages, a complex regulatory environment, lengthy permitting processes, as well as uncertainties of discretionary approval processes. The high cost of developing housing increases investment risk and focus on projects that can endure uncertainty and yield higher rents and sales prices.

The cost of housing is also conditioned by the city's attractiveness to workers, businesses and investors from the region, the country and the world²⁶. San Francisco has been an attractive place for many high-income workers and investors around the world. This attractiveness makes housing in San Francisco a valuable global commodity. The availability of resources to pay for housing partially defines what is being produced by the private market for new housing and drives the market for renovations and modification to existing housing stock. These trends have resulted in market rate housing that is only affordable to higher-income earners.

These pressures leave middle-income households with very limited choices, as federal and state funding resources only target lower income households for affordable housing. The City has recently created programs, such as educator housing, that would produce deed restricted units for eligible middle-income households. [Inclusionary requirements](#) for market rate housing have also been updated to include below market rate units that are affordable to households earning up to 150% of AMI, or \$179,850 for a three-person household. Relying on City housing subsidies to serve middle-income households would certainly mean taking away limited public funding resources from moderate-, low-, and very low-income households who are left without choices in most of the region.

Path Forward - Finding new paths to ensure that the private housing market serves the middle-income workforce is key to maintaining our city's diversity. Expanding where small and mid-rise buildings can be constructed throughout the city provides a path for the market to provide more middle-income housing

²⁶ San Francisco is the third city in the world with the highest concentration of billionaires Source and the Bay Area has concentrated around 20 percent of global venture capital, half of 'unicorn' companies and 8 out of 13 valued over \$10 billion.

opportunities without public subsidy. This objective will be met not only by increasing development capacity for small and mid-rise buildings in areas where they are not currently allowed, but also by removing uncertainty from regulatory review processes, streamlining review, and cost abatements. The smaller scale of these buildings fit within the existing scales of most of the neighborhoods in the city which provides better opportunities for a clearer regulatory framework and streamlined processes, including units that serve middle-income households without deed restrictions. Adding new units to our existing housing stock on vacant lots, and through demolition and reconstruction is a critical strategy to increase small multi-family homes particularly for middle income households. However, new units should meet the affordability rates of existing units and tenants should be offered competitive relocation programs during construction. As building multi-unit buildings has been legalized in areas designated for single-family homes throughout the city and the State, the City must encourage multi-family buildings whenever possible. The retention of single-family homes should include contributions towards affordable multi-family housing given the missing opportunities and high use of land and infrastructure resources by a single household.

OBJECTIVE 4.C

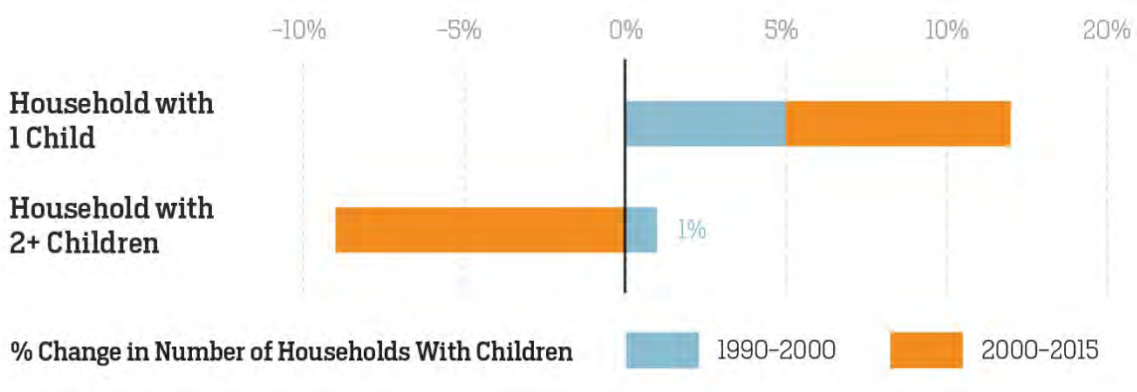
EXPAND AND DIVERSIFY HOUSING TYPES FOR ALL

Challenge - San Francisco is home to a diverse range of family and household structures including multigenerational families, LGBTQ+ families, single parents, roommate living, artist co-ops, single-person households, couples, or families with multiple children among many others. As people's lifestyles change, children move out, families grow, partners move in or out, or physical abilities change, their housing needs change as well. San Francisco residents are finding it increasingly challenging to find housing that meets their changing needs, either within their current neighborhood, or anywhere in the city. Households with children, particularly those with two or more children are having an increasingly hard time staying in San Francisco (see Figure 28), and households with children in San Francisco experience high rates of overcrowding (more than 1 person per room, including the living room) as well (see Figure 29). Other household types are also experiencing pressure: many have been doubling or tripling up to live in the City as roommates or related adults (see Figure 29). Many are forced to live in these arrangements or leave the City because they cannot find housing that is within their financial reach and meets their needs. Seniors, aging adults, and people with disabilities are unable to afford living conditions that match their abilities. A two-person educator household is likely cost burdened (paying more than 30% of their income on rent) or may not live in housing that meets their needs if interested in growing their family. Artists who once found a haven in San Francisco, and who are often the promoters of the city's diverse cultures, are turned away without viable housing choices.

Path Forward - Ensuring a diversity of housing types at various affordability levels is critical to maintaining and advancing the diversity that once defined San Francisco. The City must employ targeted programs and products that serve the particular needs of seniors, people with disabilities, transgender and LGBTQ+, transitional aged youth, or families with children. To meet these unique needs, new housing must offer varying design and amenities, promote certain typologies, be located in certain

neighborhoods, or in proximity to transit amenities. For example, promoting co-housing²⁷ will address the growing interest among some communities in living in small rooms with shared amenities (kitchen, living room, etc.). Housing for seniors and people with disabilities, at variety of income levels, must be promoted along transit corridors to address limited mobility issues. Transgender and LGBTQ+ households are interested in living in neighborhoods where they have built a community over decades. Families with children, at a variety of income levels, need improved access to child friendly amenities, and shared open spaces. All neighborhoods should provide a range of housing types, at a range of affordability levels, as well as amenities that serve the changing needs of seniors, children, people with disabilities, young individuals, and various family structures.

Figure 28. Percentage change in number of households with children from 1990 to 2015.

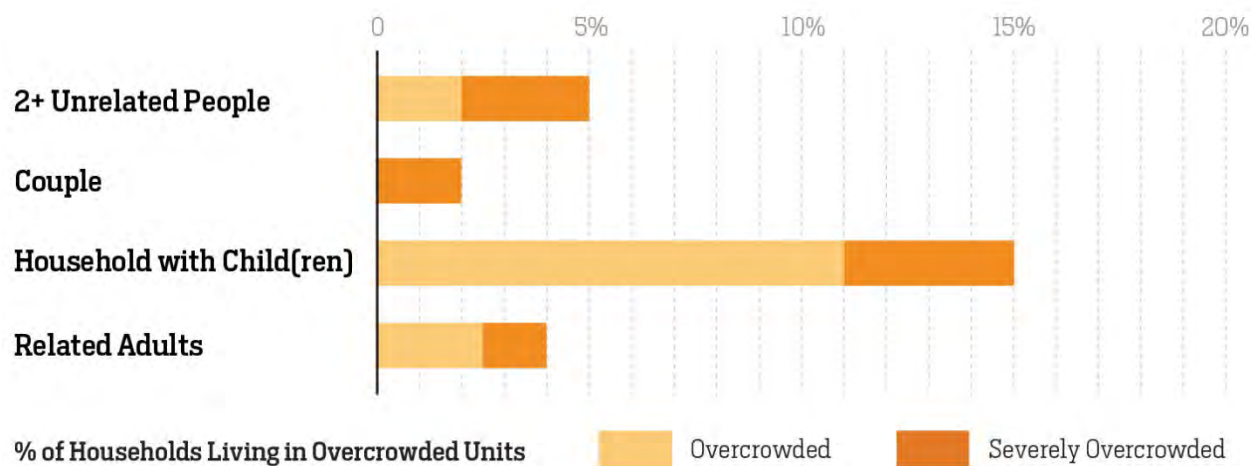


Source: San Francisco Housing Needs and Trends Report. Data: Decennial Census (1990 and 2000) and ACS (2015)

27 Co-housing, group housing, or co-living rooms are a type of housing that may have limited cooking facilities and do not contain a full kitchen in each room. Co-housing may include (but is not limited to) communes, fraternities and sororities, or Residential Hotels.

Figure 29. Percentage of households living in overcrowded* units by household type (2015).

* Overcrowded conditions are defined as more than one person per room, including the living room.



Source: San Francisco Housing Needs and Trends Report. Data: ACS 2015 5-year Estimates.

Goal 5.

Promote neighborhoods that are well-connected, healthy, and rich with community culture.

Challenge - San Francisco's neighborhoods have unique qualities and histories that enrich their residents and communities, but they also are the result of incremental decision-making and discriminatory practices that have left disparities in public services, resources, and impacts from environmental damage. Government agencies have sometimes organized past public investment around the location of new housing or land-use changes rather than an accounting for equity, which may consider needs, and quality of public investments.

Additionally, private enterprise that supports essential services like healthy food, healthcare, laundry, or childcare, has become increasingly pushed to serve high earners as their economic margins have dropped, even prior to the pandemic. Small businesses provide some of these essential services in addition to serving as neighborhood centers. However, according to the California Employment Development Department, the number of retail establishments with fewer than 10 employees in San Francisco dropped over 8%, between 2007 and 2017. As land values and online shopping and delivery services have increased and brick-and-mortar retail declined, the health of neighborhood commercial corridors varied with some corridors struggling, reducing residents' access to nearby services and opportunities to support community culture and cohesion.

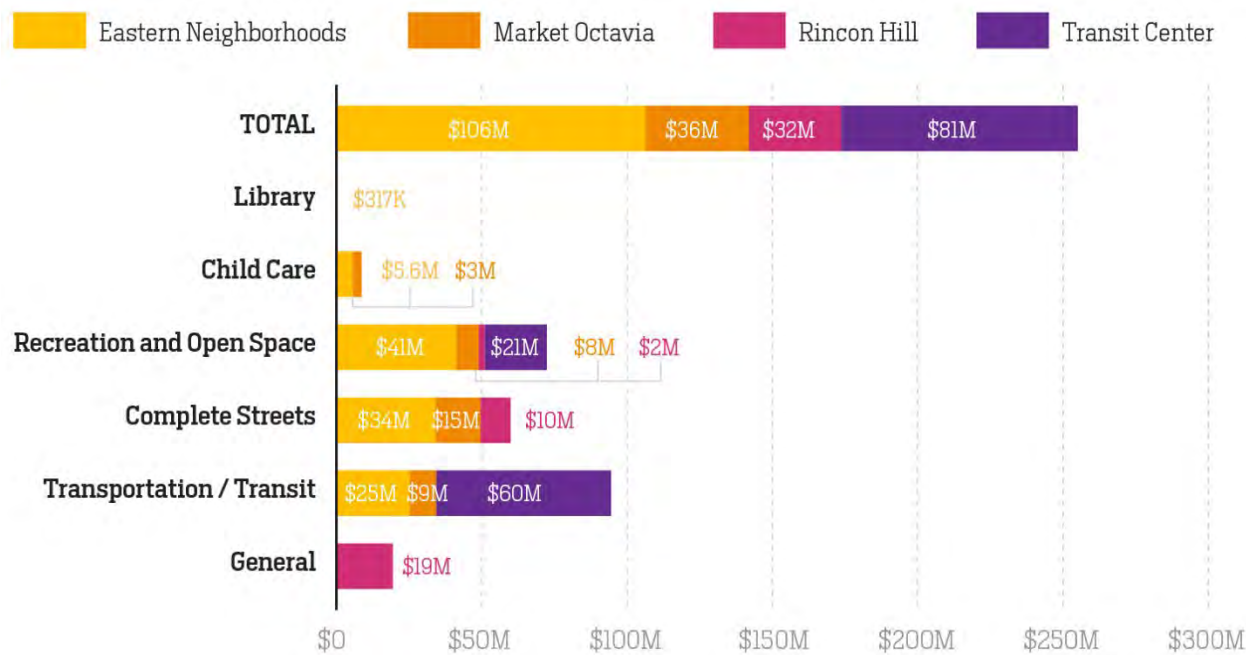
Path Forward - Having a safe, sustainable, nurturing home means more than inhabiting an indoor structure, it must be in and connected to a larger place that fulfills residents' social, cultural, and physical growth. For a neighborhood to house people, it must provide access to good quality grocery stores, healthcare, schools, community services, arts and cultural institutions. It must create a healthy environment with clean air, water, and soil and be prepared for the heightened impacts of the climate crisis, especially protecting those most at-risk. It must connect us to areas and resources beyond the neighborhood and across the city and region through equitable transit and transportation infrastructure. While a set of amenities may not be the same across neighborhoods, the City should support the unique ecosystem of each one that will nourish its communities and center equity in government investments.

This Goal provides a solid framework for the allocation of resources where changes are more urgent. To achieve healthy neighborhoods for housing residents, the City must focus on repairing past harms through environmental justice and equitable mobility strategies to address the disparate outcomes in wealth and health in [Priority Equity Geographies](#) while protecting these communities against displacement.

At the same time, as San Francisco population grows the existing community facilities and services, including parks, schools, libraries, police and fire departments, must address the growing need. Recent neighborhood zoning changes have included planning for infrastructure such as transit, open space, and street improvements using development impact fees to help fund such infrastructure, such as the [Southeast Framework](#) and [Greater SoMa Community Facilities Needs Assessment](#) (see Figures 30 to 32).

Housing in a neighborhood can foster relationships, identities, creativity, and individual well-being. Neighborhoods that express individual personalities and shared connections across cultures, race, and ethnicity, or art and architectural heritage provide a sense of community. Considering housing proximity and access to goods and services can reduce burdens, enhance the experience, or encourage healthy habits in daily life. Each neighborhood is a result of its people and histories and their efforts and challenges and should reflect these specific experiences, undo past harms and adapt to changing conditions.

Figure30. Infrastructure impact fees generated from development in Area Plans.



Source: SF Planning and DBI.

Figure 31. Nearly half of the cost of, In Chan Kaajal Park, a park built in 2017 in the Mission was funded by development impact fees.



Photo: San Francisco Recreation & Parks

Figure 32. Streetscape improvements along 22nd street to improve pedestrian safety was largely funded by development impact fees.



Rendering: San Francisco Public Works

OBJECTIVE 5.A

CONNECT PEOPLE TO JOBS AND THEIR NEIGHBORHOOD WITH NUMEROUS, EQUITABLE, AND HEALTHY TRANSPORTATION AND MOBILITY OPTIONS

Challenge - As the city and region have developed through decades of changes in economic, living, and land use patterns, transportation infrastructure has often been deployed to reconnect people's needs, primarily around jobs and housing. However, local governmental agencies often focused on the needs of middle- and high-income workers (e.g. freeways, regional commuter transit) and left many populations, especially those of color or with low-wage jobs or those outside the workforce or with other needs, with few or burdensome options. For example, Golden Gate Park, with its world-class cultural institutions and well-maintained open space full of programs and activities, is an hour-long bus ride from the areas in the city with the highest percentage of children, including Bayview, Outer Mission, and the Excelsior.

It has become increasingly difficult and more expensive to complete new infrastructure projects, including transportation projects. Thus the City is challenged to keep up with growth, which, limits persons quality and life and access to opportunities (e.g., jobs, parks, schools, etc.). Those living in historically underserved communities and those with limited mobility options continue to face greater challenges than those able-bodied persons with more resources.

Additionally, the past two decades have transformed former mostly industrial neighborhoods into more mixed-use neighborhoods, including with housing. This has occurred primarily in the southeast portion of the city where historically there was less investment and stability in the types of small businesses that serve residents. These redeveloping areas include public benefits such as new or improved infrastructure. However, some residents may feel some benefits are oriented to future residents rather than supporting the needs of existing residents and businesses.

Path Forward - A more equitable San Francisco requires planning for how housing, jobs, services, institutions, and resources are interconnected in and between vibrant neighborhoods.

Some areas of the city, primarily lower density neighborhoods in the middle, western, and northern neighborhoods, have had greater per capita public investment in infrastructure. This includes more per capita investments in schools, transit, parks, and other community facilities. Providing more housing in these locations opens access to these benefits to more people. The City will address how new housing impacts existing neighborhoods depending on their geography, history, cultural identity, and past discrimination. These efforts address and support neighborhood life, such as economic development, facility planning, collaboration across agencies, and community-based organizations. The priority is to help people thrive by meeting their needs and providing opportunities that are easily accessible, which also supports San Francisco's goals for of healthier transportation and climate.

San Francisco has been a Transit First City for 45+ years, with a clear intention of supporting public transportation and walkable and bikeable neighborhoods. In the past decade, it has also significantly invested in [Vision Zero](#), a program to get to zero traffic fatalities by 2024; the [Climate Action Plan 2021](#), to reduce carbon emissions; and [ConnectSF](#) a fifty-year vision for San Francisco's mobility. [ConnectSF](#) relates directly to housing considerations, for example that we should preserve permanently affordable housing. Maintaining – and increasing – the City's stock of permanently affordable housing is critical, especially in areas receiving new infrastructure investment and add new low- and moderate-

income housing near essential services and schools. The city's transportation policies will also be anchored in the upcoming [Transportation Element Update](#) which will be designed to center racial and social equity to redress historic harms, prioritize undoing damage, promote equity, and prioritize those most at-risk of being excluded from transportation resources.

One of the City's climate goal is to have 80% of trips be made using low carbon modes by 2030 – such as transit, walking, biking, or electric vehicle. Building multi-family housing near transit helps the City meet these goals. It helps the City meet climate goals by providing access to transit for more people; it improves the cost-effectiveness of existing transit investments and makes the City more competitive for regional, state, and federal funds to expand transit; and it provides a larger customer base for businesses located along or nearby transit lines.

OBJECTIVE 5.B

ADVANCE ENVIRONMENTAL JUSTICE, CLIMATE, AND COMMUNITY RESILIENCE

Challenge – Many environmental perils exist for residents of San Francisco, some natural and others exacerbated by human action, resulting in inequitable consequences. In San Francisco, as in many other cities, low-income households and people of color are more likely to live in neighborhoods with environmental hazards, such as toxic groundwater, polluting industrial activities, congested freeways, and hazardous and solid waste facilities. In large part, this is the direct result of [racial covenants](#), [redlining](#), [urban renewal](#) and other discriminatory programs that have historically restricted where people of color may live. Furthermore, these communities may be less likely to have access to health-supportive resources, such as grocery stores, safe parks and open spaces, adequate and stable employment, health facilities, and frequent public transit. These disparities result in worse health outcomes and shortened life expectancy for our most vulnerable populations. For instance, in San Francisco, the average life expectancy for Black men (68 years) is more than a decade shorter than the citywide average (80 years), and 15 years shorter than the group with the longest life expectancy, Asian men (83 years).²⁸

The COVID-19 pandemic has exacerbated the consequences of these existing health disparities. To date, the pandemic has disproportionately impacted communities of color, with those in the Latino/e/x and Black communities at highest risk (see Figure 33). The same health conditions that are more prevalent in neighborhoods most impacted by environmental injustice – asthma, heart disease, diabetes, hypertension – have also been identified as major risk factors for COVID-19.

San Francisco is increasingly vulnerable to climate crisis-related hazards like sea level rise, poor air quality, and extreme heat events. For example, approximately 37,200 people in San Francisco live in areas vulnerable to flooding from sea level rise (see Figure 34) and recent wildfires have shown that the entire city is vulnerable to poor air quality. Environmental pollution also affects certain neighborhoods that

28 "Mortality." SFHIP. San Francisco Health Improvement Partnership. Accessed January 14, 2022. <http://www.sfhip.org/chna/community-health-data/mortality/>

are identified by the State as “disadvantaged communities.”²⁹ Similarly, earthquakes have been a historic hazard to San Francisco residents despite the city having the highest building code rating for structural safety required in new buildings. The city has had programs that require or encourage seismic upgrades to existing buildings, with the aim of fostering a housing stock resilient to possible future earthquakes. This continues to be a challenge, along with the possible massive disruptions to infrastructure.

Even under normal conditions, housing is in constant need of repair and rehabilitation to remain safe and supportive. Those who have housing instability are more likely to stay in housing that is unsafe or inadequate where either landlords or low-income homeowners defer improvements, with the latter facing increasing pressure to sell and leave the city altogether. Or in cases where the housing is maintained, households may have a higher occupancy than is safe, rendering fire codes insufficient in case of emergency.

Path Forward - Addressing both safe housing and a safe environment for neighborhoods requires substantial investment, planning, and inter-agency coordination. The City’s [Climate Action Plan 2021](#), [Earthquake Safety Implementation Program](#), and the [Environmental Justice Framework](#) (see Figure 35) currently in process are three significant efforts across the city to address the many environmental challenges in relation to housing. In 2019, San Francisco declared a climate emergency in accordance with the Paris Climate Agreement and committed to eliminating greenhouse gas emissions by 2050. This commitment relies on the transformation of energy supply, buildings, transportation and waste system to reduce emissions. New housing development can help contribute to these goals by meeting the City’s Green Building Code standards. Emissions from buildings stem mostly from the use of natural gas for water and from space heating, recently eliminated as an option through the City’s New Construction Ordinance. San Francisco has committed to zero emissions in new construction by no later than 2030.

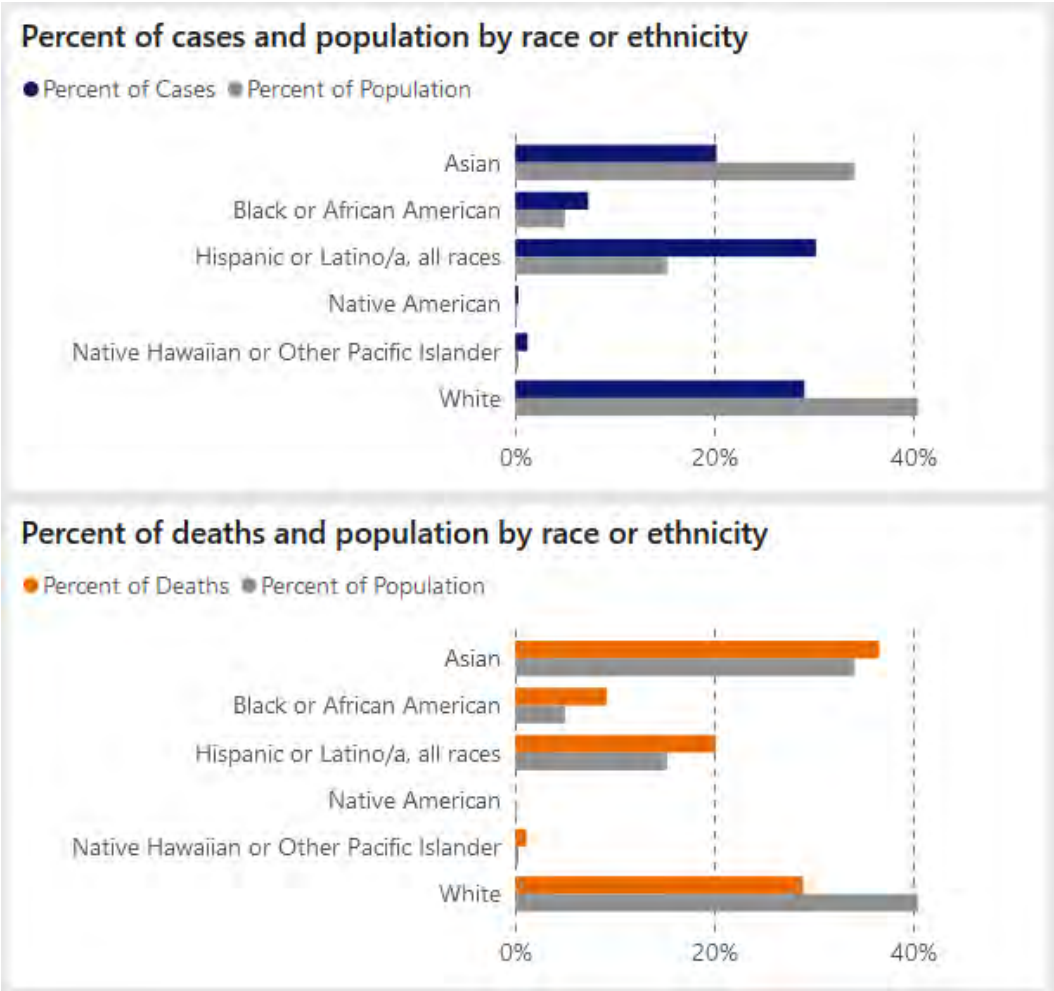
As most of San Francisco’s housing was built before the middle of the last century, many buildings may require upgrades to improve resiliency against these hazards as well as general habitability. Older and inadequately maintained buildings are less able to weather the impacts of these climate and environmental challenges. When these buildings fail, the outcomes are worse for lower-income households and those with health conditions and other existing vulnerabilities. As local, state, and federal resources are made available to address efficiency and resiliency of residential buildings, for example the State-funded and locally run [CALHome program](#), and the [Capital Improvement Program](#), these resources should be prioritized to address existing inequities faced in vulnerable neighborhoods. The city should continue to support seismic upgrades and lead remediation, in such programs as DPH’s [ChildHood Prevention Lead Program](#), prioritizing homeowners in Environmental Justice communities.

New housing development can also include neighborhood retail and other services on the ground floor, such as grocery stores, childcare, stores, restaurants, community centers, health facilities, etc. that meet the needs of residents. Finally, new housing can provide open space as required by SF Planning Code, community gardens, living roofs as required by the SF [Better Roofs Ordinance](#) (see Figure 36), and street trees as required by the [SF Better Streets Plan](#) that benefit existing and new neighbors. Integrating

29 “Disadvantaged communities” is an area identified by the California Environmental Protection Agency pursuant to Section 39711 of the Health and Safety Code or an area that is a low-income area that is disproportionately affected by environmental pollution and other hazards that can lead to negative health effects, exposure, or environmental degradation.” Source: CA Office of Planning and Research, General Plan Guidelines, Chapter 4: Required Elements, June 2020

and designing sites to accommodate nature, through requirements such as [Bird Safe Building Standards](#), throughout our streets and buildings improves air quality, plant and wildlife health, human wellness, and climate adaptation.

Figure 33. Percent of cases and death by race or ethnicity.



Source: Data SF; extracted January 14, 2022.

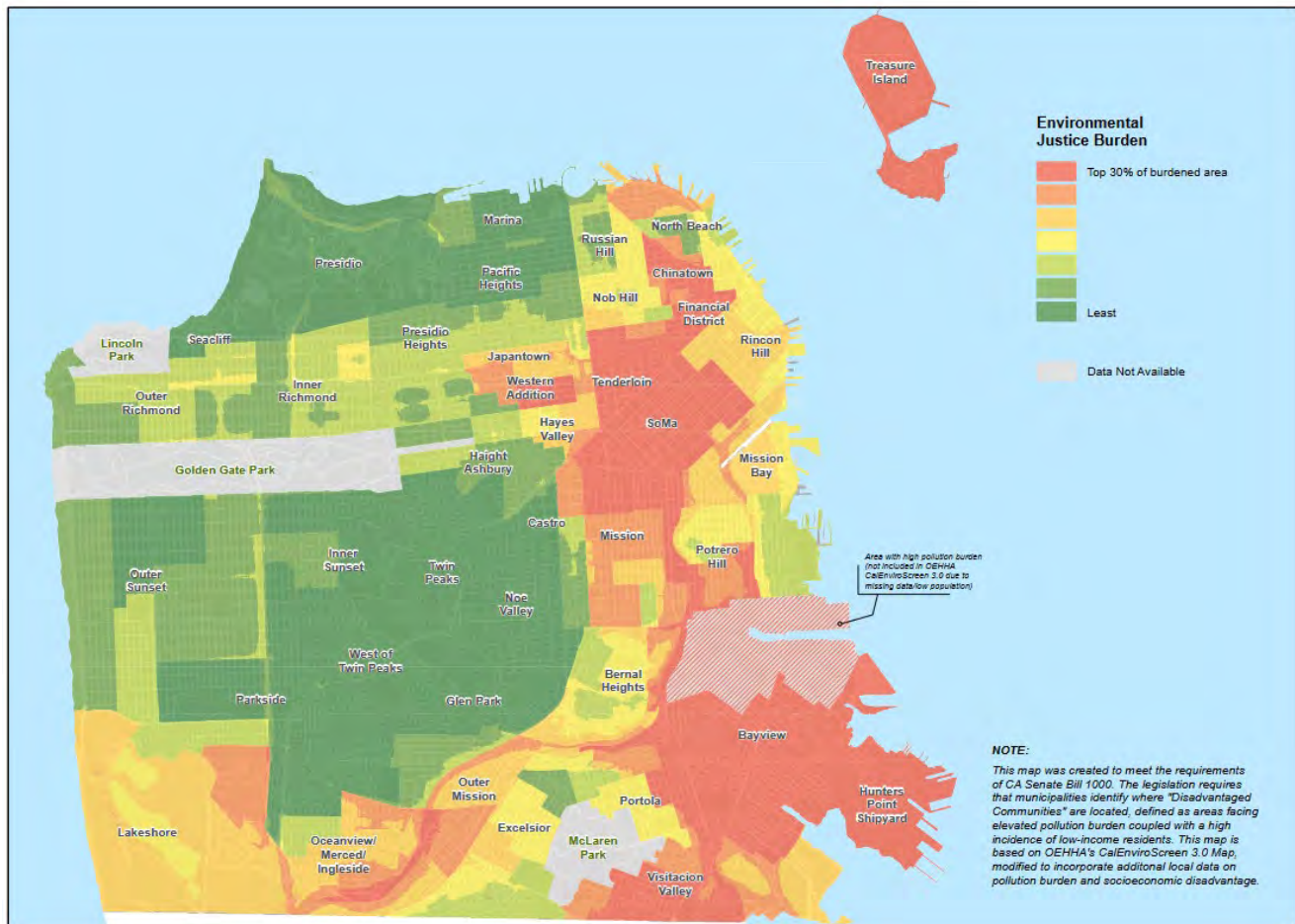
Figure 34. Areas vulnerable to sea level rise.



Source: San Francisco Sea Level Rise Action Plan

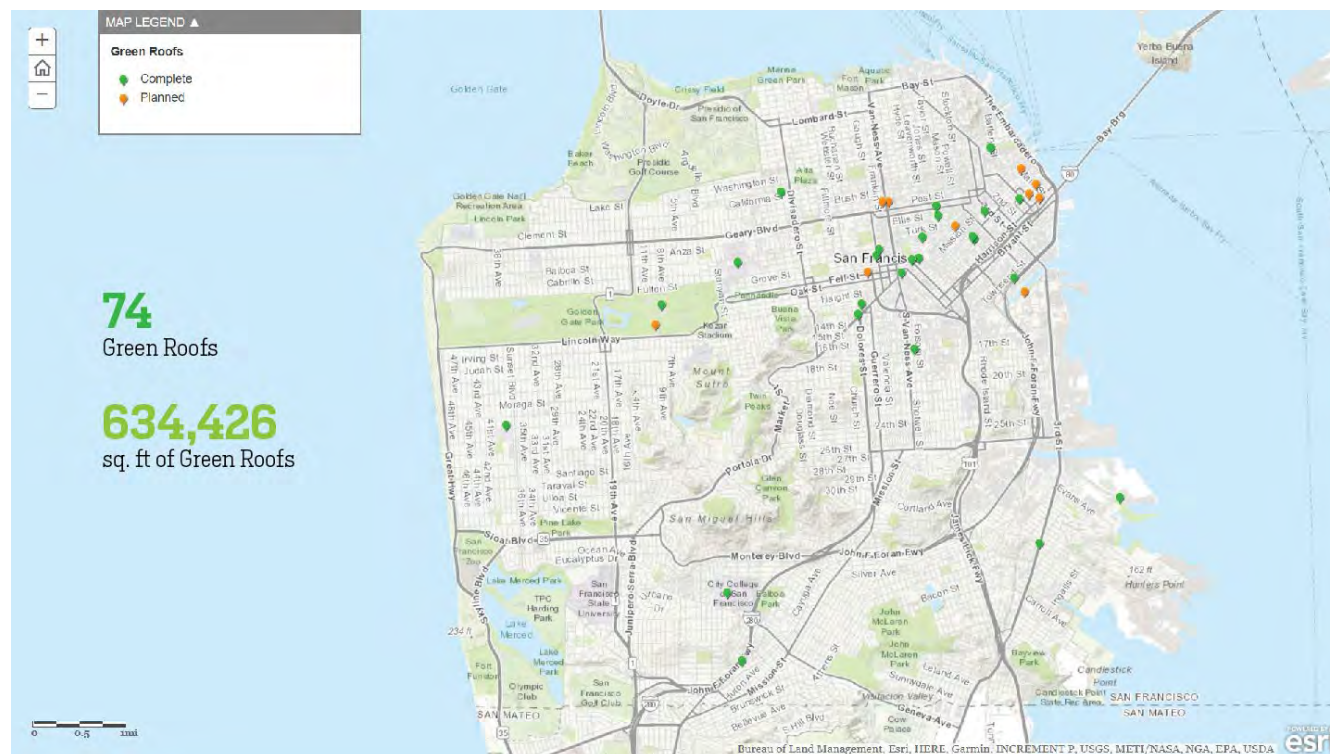
Figure 35. Draft Environmental Justice Communities [2021].

Areas of San Francisco that have higher pollution and are predominately low-income. This map is based on [CalEnviroScreen](#), a tool created by CalEPA& OEHHA that maps California communities that are most affected by pollution and other health risks. "EJ Communities" are defined as the census tracts with the top 30% of cumulative environmental and socioeconomic vulnerability across the city.



Source: SF Planning's Environmental Justice Framework.

Figure 36. San Francisco has recently required certain development projects to provide a 'living roof'.



Source: San Francisco Planning

OBJECTIVE 5.C

ELEVATE EXPRESSION OF CULTURAL IDENTITIES THROUGH THE DESIGN OF ACTIVE AND ENGAGING NEIGHBORHOOD BUILDINGS AND SPACES

Challenge - The cultural diversity of San Francisco's neighborhoods is threatened by the displacement of racial, ethnic and other marginalized cultural groups, such as transgender and LGBTQ+ residents. While San Francisco's neighborhoods still retain a high level of cultural identity which contributes to their sense of place and to the residents' sense of belonging, this aspect of community stability is hard to sustain when the culture bearers and community members that embody that identity can no longer afford to live in the neighborhood. Across communities of color and other marginalized groups, the forces of displacement are making it difficult for cultural groups to transmit the traditions, practices, and artistic expressions that define them and their heritage. This erodes the health and cultural richness of the community, which can be witnessed through the loss of culturally significant businesses, community spaces, art and cultural programming.

As an example of this challenge to retain the city's cultural diversity, the city has lost significant Legacy Businesses³⁰ over the past decade due to displacement pressures and lower income communities of

30 In order to be designated by the Board of Supervisors as a Legacy Business, businesses must generally have operated in San Francisco for 30 or more years, have contributed to the city's history and/or the identity of a particular neighborhood or community, and be committed to maintaining the physical features and traditions that define the business, including crafts, cuisines, art forms, or activities.

color have been hit particularly hard. A 2014 report by the City's Budget and Legislative Analyst's Office showed the closure of small businesses in San Francisco had reached record numbers with almost 4,000 small businesses closing in 2014 alone. In contrast, only 693 small businesses closed in 1994, the first year of the study. The report drew connections to San Francisco's skyrocketing rents and the high level of commercial evictions, which continue today. The [Legacy Business Registry](#) and corresponding fund were created in 2015 in recognition of this loss and to mitigate or reverse the trend.

Similarly, the city's [Cultural Districts](#) Initiative was formalized in 2018 with the aim of stabilizing vulnerable communities facing or at risk of displacement or gentrification, and to preserve, strengthen and promote our cultural assets and diverse communities. While both of these innovative programs provide potentially effective models for government interventions to fight community displacement and elevate expressions of cultural identity, the funding needs of both programs to date have far exceeded the allocated resources.

While many parts of the city, such as the Cultural Districts, aim to reinforce cultural identities that are at-risk, other parts of the city not identified as such may expect new housing opportunities to arrive subject to more general design guidance. Historically, San Francisco design guidance has reinforced existing patterns, whether in massing or façade or roofline expression, even though some of the original housing stock was mass-produced with little individual character or architectural quality. While this desire for compatibility was intended to prevent vast and dramatic changes in scale, in practice over time scale has mostly been addressed through code or zoning requirements and these have mostly limited creativity, architectural expression, and muted the voices of an expanding diversity of residents. While continuity of place is essential in cities, public space, facades, and street environments should also reflect the evolutions in personal and cultural expression.

Path Forward - As new development comes to San Francisco's neighborhoods, good building design should remain sensitive to the unique neighborhood context while enhancing these neighborhoods. New buildings can improve the experience of existing and new neighbors through architecture, services or retail provided on the ground floor, or the streetscape improvements on the fronting street. New development should help maintain neighborhoods' historic architectural heritage and landmarks as well as their cultural heritage: objects, beliefs, traditions, practices, artistic interpretation, and significant places that develop a sense of belonging and identity. New development must also recognize the erased histories and heritage from American Indian, Black and other communities of color.

[Cultural Districts](#) will be an important platform to move forward; they have been defined by the city as areas containing a concentration of cultural and historic assets, culturally significant enterprise, arts, services, or businesses and a significant portion of its residents or people who spend time in the area, are members of a specific cultural community or ethnic group that historically has been discriminated against, displaced or oppressed. By reflecting the cultural identities of their residents in new development, building design can create environments that cultivate understanding and appreciation of diverse peoples, that honor the stories of all communities, and that foster a sense of belonging for all residents. This can be achieved through design and artistic expression in the built environment – buildings, parks, sidewalks, streets, structures, and other public spaces – and through the activation and use of public and private spaces. By elevating expression of cultural identities, the City can encourage more equitable local economies, and advance social justice. In this way, this objective also furthers Objective 3a to “Build intergenerational wealth for American Indian, Black, and other communities of

color.” The creativity and sense of belonging resulting from this work will promote mental health while resulting in layered cultural landscapes and experiences for residents, workers, and visitors.

Achieving this objective will mean re-evaluating how existing and new design guidelines can be utilized to foster creativity while implementing foundational design principals and ensuring durable building materials. It also requires the Planning Department to explore how design, especially at the ground floor, supports social engagement and the vibrancy of neighborhoods. At the same time, it requires tools that ensure that existing expressions of cultural identity and places that hold cultural and historic meaning are respected. In other cases, the city should explore limiting or revising discretionary guidelines to balance the needs of new housing and neighborhood scale, which is already governed by definitive height and bulk controls. By creating and adopting objective standards that focus on the major concerns—light and air, dramatic shifts in scale—the city can allow for more flexibility in how neighborhoods look and feel, inviting new residents to join in and creative disciplines to deploy their talents.

The management of culturally and historically significant spaces must be guided by the culture bearers and descendants of those cultural groups, and special attention should be paid to those groups that have been marginalized from these decisions in the past. Ramaytush descendants and the American Indian community more broadly both hold special roles in guiding how the city manages tribal cultural resources and places significant for American Indian cultural practices. Consultation methods and information systems must be improved to ensure their full participation in decisions affecting the Ramaytush and American Indian community.

The City can utilize and expand existing historic preservation tools such as protective ordinances, rehabilitation incentives, and environmental laws to improve the management of places that express cultural identity. And the City can grow new and innovative programs such as the [Legacy Business Registry](#), the [Citywide Retail Strategy](#), and [Cultural District program](#) to guide cultural resource management and programs intended to support cultural uses and activities throughout the city.

POLICIES AND ACTIONS

POLICY 1: Minimize [no-fault](#) and [at-fault](#) evictions for all tenants, and expand direct rental assistance as a renter stabilization strategy.

Objective 1.A Ensure housing stability and healthy homes.

Objective 1.B Advance equitable housing access.

Objective 3.C Eliminate community displacement within areas vulnerable to displacement.

Implementing Program Areas: Antidisplacement and Tenant Support; Evict Accessible and Affordable housing; Homeless Prevention and Elimination

Actions

- a. Implement the digital [Rental Housing Inventory](#) to collect data that informs the evaluation of anti-displacement programs, including rental rates, [rent control](#) status, vacancy, and services provided. (Rent Board; Short)
- b. Fund the [Tenant Right-to-Counsel program](#) to match the need for eviction defense. (MOHCD, Mayor/BOS; Medium)
- c. Expand rental assistance programs, including those designed for emergency response, for population-specific assistance, ongoing tenant-based support, and time-limited assistance (such as Rapid Rehousing), as also referenced in Policy 9, action (d) as a homelessness prevention tool. (Mayor/BOS, MOHCD, HSH; Medium)
- d. Provide a priority in the allocation of direct rental assistance to vulnerable populations and in [areas vulnerable to displacement](#). (MOHCD, HSH; Short)
- e. Reduce severe cost burdens for extremely low and very low income tenants through rental assistance, for example by providing sufficient assistance to qualifying SRO tenants to pay no more than 30% of their household income. (MOHCD, Mayor/BOS; Medium)
- f. Increase [relocation assistance](#) for tenants experiencing either temporary or permanent evictions. (Mayor/BOS, Rent Board; Short)
- g. Increase the time period during which [relocation compensation](#) is required when using temporary evictions from three to six months. (Mayor/BOS, Rent Board; Short)
- h. Clarify and limit the definition of nuisance or other just cause evictions as needed to limit abuse. (Mayor/BOS, Rent Board; Short)
- i. Pursue proactive and affirmative enforcement of eviction protections programs, especially for [Owner Move-in](#) and [Ellis Act evictions](#), including annual reporting by owners that is enforced by site inspections and confirmation of owner occupancy and funded through owner fees. (Rent Board; Medium)

- j. Proactively enforce eviction protection and avoid predatory practices or tenant harassment by pursuing affirmative litigation models.³¹ (MOHCD; Medium)
- k. Adopt incentives for property owners to rebuild buildings struck by fire within two years to house prior tenants by when the transitional housing program timeline expires (HSA, DBI, Planning, Mayor/BOS; Short)
- l. As informed by Policy 21, action (d) and in coordination with community liaisons referenced under Policy 14, action (b), support and expand community-led navigation services and systems to provide tenants' rights education, similar to the existing culturally competent Code Enforcement Outreach Program that is offered within the Department of Building Inspection; and consider expanding this culturally competent program to other disadvantaged communities. (MOHCD; Medium)
- m. Advocate for State legislation to reform the [Ellis Act \(Government Code Chapter 12.75\)](#) to stabilize rental housing by, for example, imposing a minimum holding period of five years before the Act can be used to evict tenants. (Planning, Mayor/BOS; Medium)
- n. Advocate for State legislation to reform the [Costa-Hawkins Housing Law](#) to allow cities to better stabilize tenants by, for example, allowing cities to extend [rent control](#) to multifamily housing that is at least 25 years old. (Planning, Mayor/BOS; Medium)

31 Examples of similar programs in effect in 2021 include Oakland's Community Lawyering & Civil Rights program or Chicago's Residential Landlord and Tenant Ordinance.

POLICY 2: Preserve affordability of existing subsidized housing, government-owned or cooperative-owned housing, or [SRO hotel rooms](#) where the affordability requirements are at risk or soon to expire.

Objective 1.A Ensure housing stability and healthy homes.

Objective 1.B Advance equitable housing access.

Objective 3.C Eliminate community displacement within areas vulnerable to displacement.

Implementing Program Areas: Accessible and Affordable Housing; Antidisplacement and Tenant Support; Existing Housing Preservation and Affordability

Actions

- a. Conduct a comprehensive needs assessment of existing housing cooperatives to identify impediments to success and need for support (MOHCD; Short).
- b. Expand resources for preservation, rehabilitation, or rebuilding of cooperative buildings, and adopt requirements such as one-to-one replacement of affordability rates, right-to-return, and relocation plans as informed by the needs assessment referenced under Policy 2, action (a). (MOHCD; Medium)
- c. Expand technical assistance and support to limited equity cooperatives regarding governance, finance, management, and marketing. (MOHCD; Short)
- d. Expand resources to continue to negotiate preservation agreements for properties with expiring affordability restrictions to ensure permanent affordability and housing stability for tenants to the greatest extent possible. (MOHCD; Medium)
- e. Identify units in permanently affordable projects that can be used as temporary housing for those temporarily displaced by affordable housing rehabilitation or redevelopment. (MOHCD, Mayor/BOS; Medium)
- f. Identify [SRO residential hotels](#) in advanced states of disrepair where demolition and construction of new Permanent Supportive Housing may be more cost-effective than rehabilitation and requiring tenant relocation plans during construction and a right to return for tenants. (DBI, HSH, Planning; Medium)
- g. Increase fines for illegally converting [SROs](#) to new uses or illegally preventing residents from establishing tenancy by forcing short-term stays. (DBI; Short)
- h. Utilize zoning solutions to allow large affordable housing sites to leverage additional density and development to fund rehabilitation and preservation of existing affordable units for current residents while creating more affordable units. (Planning, MOHCD; Short)

POLICY 3: Acquire and rehabilitate privately-owned housing as permanently affordable to better serve residents and areas vulnerable to displacement with unmet affordable housing needs.

Objective 1.A Ensure housing stability and healthy homes.

Objective 1.B Advance equitable housing access.

Objective 4.A Substantially expand the amount of permanently affordable housing for extremely low- to moderate-income households.

Implementing Program Areas: Access to Housing; Existing Housing Preservation and Affordability

Actions

- a. Prioritize building purchases for the acquisition and rehabilitation program that serve extremely- and very-low-income and unhoused populations including purchase of [SRO residential hotels](#). (MOHCD, DBI; Medium)
- b. Implement the Community Opportunity to Purchase Act (COPA) to increase non-profit capacity-building investments to purchase and operate existing tenant-occupied buildings as permanent affordable housing in western neighborhoods, particularly for populations and [areas vulnerable to displacement](#). (MOHCD; Medium)
- c. Evaluate the feasibility of utilizing the Small Sites program to increase shared equity or cooperative ownership opportunities for tenants. This study would also inform expansion of shared equity homeownership models cited in Policy 11, action (f) and Policy 23, action (a). (MOHCD, Planning; Short)
- d. Incentivize private owners to sell residential buildings to non-profit affordable housing developers via transfer tax exemptions or other financial measure. (Planning, MOHCD, Mayor/BOS; Medium)

POLICY 4: Facilitate the legalization of unauthorized dwelling units while improving their safety and habitability.

Objective 4.B Expand small and mid-rise multi-family housing production to serve our workforce, prioritizing middle-income households.

Implementing Program Areas: Existing Housing Preservation and Affordability

Actions

- a. Facilitate and encourage more legalizations through financial support such as low-interest or forgivable loans for property owners. (MOHCD, Mayor/BOS, DBI; Medium)
- b. Update the Conditional Use findings requirements for removal of unauthorized dwelling units to account for tenancy and to identify alternative findings to financial hardship findings that account for the cost and construction burdens of legalization. (Planning, DBI, Mayor/BOS; Short)
- c. Reduce cost of legalization by removing Planning and Building Code requirements that are not critical for health or safety. (Planning, DBI, Mayor/BOS; Medium)

POLICY 5: Improve access to the available Affordable Rental and Homeownership units especially for disproportionately underserved racial and social groups.

Objective 1.B Advance equitable housing access.

Objective 3.A Build intergenerational wealth for American Indian, Black, and other communities of color.

Implementing Program Areas: Access to Housing; Accessible and Affordable Housing; Vulnerable Groups

Actions

- a. Identify racial, ethnic, and social groups who have been disproportionately underserved by MOHCD's available Affordable Rental and Homeownership units and the underlying reasons why those groups are underrepresented in obtaining such housing. These groups include but are not limited to previously identified groups such as American Indian, Black, Latinos, and other people of color, transgender and LGBTQ+ people, transitional aged youth, people with disabilities, and senior households. This study can inform the housing portal cited in Policy 14 (e). (MOHCD, Planning; Short)
- b. Through the Inclusionary Technical Analysis Committee, assess by 2024 whether affordability levels of rental and ownership units created through the [Affordable Inclusionary Housing Program](#) are accessible to groups underserved as studied in Policy 5, action (a), update those requirements in balance with ensuring financial feasibility as referenced in Policy 24 (a). (Planning, MOHCD; Mayor/BOS; Short)
- c. Evaluate and update existing policies and programs to increase the percentage of Affordable Rental and Homeownership units awarded to underserved groups identified through the studies referenced in Policy 5, action (a) and (f), including but not limited to [preferences](#), strengthening targeted outreach, education, housing readiness counseling, and other services specific to the needs of each group, ensuring accessible accommodations in these services, as well as increasing production of units affordable to extremely low, very low, and moderate income households as referenced under Policy 15, action (a), Policy 19, action (b), and Policy 23, action (b). (MOHCD; Short)
- d. Evaluate area median incomes and unit types and identify strategies to secure housing for applicants to the Affordable Rental and Homeownership unit lottery program who have not won the lottery after more than five years of submitting applications. (MOHCD, Mayor/BOS; Short)
- e. Expand the [Certificates of Preference](#) program as allowed per recent State Law in Assembly Bill 1584 (Health and Safety Code, SEC 13 – 16), to qualify low or moderate income descendants of those displaced by redevelopment projects for priority in renting or buying affordable housing. Conduct comprehensive outreach and engagement to identify the descendants of households who have been displaced. Expanding this program should rely on strategies that ensure such units meet the preferences and needs of eligible households as informed by Policy 5, action (f). (OCII, MOHCD; Short)
- f. Conduct a study to engage with [Certificates of Preference](#) holders and their descendants to identify their housing needs, preferences, and income levels and create a tracking system to better monitor

who has obtained or declined affordable rental and homeownership opportunities and why. (OCII, MOHCD; Short)

- g. Identify and adopt local strategies and advocate for State legislation to remove barriers to access permanently affordable housing for immigrants or people who lack standard financial documentation such as credit histories, bank accounts, or current leases; and for transgender people whose documentation may need corrections not possible due to immigration status, and/or non-California state laws. (MOHCD, Mayor/BOS; Short)
- h. Expand the Senior Operating Subsidy (SOS) program to allow extremely and very low-income seniors to be eligible for the senior Below Market Rate rental units. (MOHCD; Short)
- i. Expand existing culturally responsive housing counseling to applicants to MOHCD Affordable Rental and Homeownership Opportunities through a network of community-based housing counseling agencies, in consultation with Cultural Districts, and as informed by the needs identified under Policy 5, actions (a), (c), and (f). These programs include financial counseling, market-rate and below market rate rental readiness counseling, and other services that lead to finding and keeping safe and stable housing; expansion of such services should in coordination with Policy 21, action (d), and informed by community priorities working with liaisons referenced under Policy 14, action (b). (MOHCD; Short)
- j. Strengthen monitoring and enforcement of Below Market Rate units to avoid fraud and abuse of units and to unlock more units for those eligible and in need, through active enforcement of existing obligations, expedited leasing of new and turnover units, and completing the DAHLIA partners database. (MOHCD; Medium)
- k. Develop a housing portal for the DAHLIA database to provide a hub for applicants to access all housing programs and services including as rental assistance, affordable housing lotteries, vouchers, and public housing. (MOHCD; Medium)
- l. Amend the [Inclusionary Housing Program](#) regulations to allow existing homeowners of Below Market Rate units to purchase another Below Market Rate unit and sell their current unit in cases where household size changes or another reasonable accommodation is required, in order to respond to changing household needs. (MOHCD, Planning; Short)

POLICY 6: Advance equal housing access by eliminating discrimination based on race, ethnicity, immigration status, HIV+ status, gender identity, sexual orientation, disabilities, age, prior incarceration, or mental health and improving housing programs for underserved groups.

Objective 1.B Advance equitable housing access.

Implementing Program Areas: Access to Housing; Homeless Prevention and Elimination; Vulnerable Groups

Actions

- a. Identify and implement strategies to increase placement in Permanent Supportive Housing through the Coordinated Entry assessment for racial and social groups who are overrepresented in the unhoused population, such as extremely and very-low income American Indian, Black, and Latino(a/e) people, transgender people, or people with prior involvement in the criminal justice system. (HSH, MOHCD; Short)
- b. Evaluate and identify common cases of discrimination and violation of fair housing law and groups who continuously face such discrimination, including transgender and LGBTQ+, or people with disabilities, and implement solutions to strengthen enforcement of fair housing law in those cases. (HRC; Medium)
- c. Amend the City's Fair Chance Ordinance to incorporate best practices to expand housing access for people with criminal records to privately-owned units, Housing Choice Voucher units, and other federally funded units.³² (HRC, MOHCD, APD; Short)
- d. Study and remove barriers to entry for temporary shelters, transitional and Permanent Supportive Housing for unhoused individuals and families, particularly for individuals with mental health or substance abuse issues, and prior involvement with the criminal justice system. (HSH, DPH, APD; Medium)
- e. Conduct a Housing Needs Assessment³³ for seniors and people with disability every three years to inform strategies that meet their housing needs, as referenced in Policy 32. (HSA, Planning; ongoing)
- f. Identify new strategies to address the unique housing and service needs of specific vulnerable populations to improve housing access and security for each group, using the findings from the City's housing Consolidated Plans and through direct engagement of these populations. Studies should address the needs of veterans, seniors, people with disabilities, youth, transgender and LGBTQ+ populations. (MOHCD, HSH, Planning; Medium)

32 Examples of similar programs can be found in affect in Oakland, CA and Seattle, WA in 2021.

33 These studies were required by Ordinance 266-20, passed by San Francisco Board of Supervisors in December 2020.

POLICY 7: Pursue permanently affordable housing investments that are specific to the geographic, cultural, and support needs of recently arrived or newly independent residents or residents from marginalized groups, including transgender and LGBTQ+ people.

Objective 1.B Advance equitable housing access.

Objective 4.C Diversify housing types for all cultures, family structures, and abilities.

Implementing Program Areas: Accessible and Affordable Housing; Homeless Prevention and Elimination; Vulnerable Groups

Actions

- a. Study and identify programs that respond to the needs of transgender and LGBTQ+ groups, particularly those who are refugees, lack family connections, or previously incarcerated, to incorporate into permanently affordable housing investments that are concentrated in the neighborhoods where they have historically found community, such as the Castro for LGBTQ+ communities or the Tenderloin for transgender people of color, building upon research spearheaded by the [Castro LGBTQ Cultural District](#). (MOHCD, Planning; Short)
- b. Support implementing San Francisco's "Ending Trans Homelessness Plan" as referenced under Policy 8, action (n), as well as the ongoing housing placement for the transgender community. (HSH, OTI, MOHCD; Medium)
- c. Continue to provide housing affordable to HIV positive applicants on the [Plus Housing List](#). (MOHCD; ongoing)
- d. Expand housing for transitional aged-youth in permanently affordable housing including supportive programs that address their unique needs such as a past criminal record, substance abuse, sexual orientation, gender identity, or other specific needs, as informed by the strategies referenced in Policy 7, action (d). (MOHCD, HSH; Medium)
- e. Study and identify programs, geographies, and building types that respond to the needs of recently arrived immigrants to inform permanently affordable housing investments in the neighborhoods in which they initially settle, such as Chinatown, the Tenderloin, the Mission, and other gateway neighborhoods. (MOHCD, Planning; Short)

POLICY 8: Expand permanently supportive housing and services for individuals and families experiencing homelessness as a primary part of a comprehensive strategy to eliminate homelessness.

Objective 1.C Eliminate homelessness.

Objective 4.A Substantially expand the amount of permanently affordable housing for extremely low- to moderate-income households.

Implementing Program Areas: Access to Housing; Homeless Prevention and Elimination; Reduction of Constraints for Housing Development, Maintenance and Improvement; Vulnerable Groups

Actions

- a. Identify a numerical target for building Permanently Supportive Housing based on Point-in-Time Counts in 2022, to house approximately a third of the total unhoused population in Permanent Supportive Housing and services, and update this target based on the 2022 Strategy completed by the Department of Homelessness and Supportive Housing. (HSH; Short)
- b. Using the annual budget for capital, operating and services costs, increase funding needed to meet the targets set in Policy 8, action (a), in balance with funding needed for the actions in this policy including short and long-term rental subsidies. (Mayor/BOS, HSH, MOHCD; Medium)
- c. Prioritize people who are unhoused for direct rental assistance paired with social services. (SFHA, HSH; Short)
- d. Increase operating subsidy funding for services and rent in City-funded permanently affordable housing projects so that the share of housing units can increase to 30% or greater of all project units. (MOHCD; Medium)
- e. Expand and improve on-site supportive services within Permanent Supportive Housing projects including sustained care for mental health or substance abuse issues, case management, and childcare. (HSH, HSA, DPH; Medium)
- f. Utilize the state-wide streamlining opportunities to expedite and increase the production of Permanent Supportive Housing. (MOHCD, Planning; Short)
- g. Evaluate the current prioritization system of the Coordinated Entry System for housing placement and services for unhoused residents that currently focuses only on chronic homelessness; and adopt additional levels of priorities for other vulnerable applicants to avoid worsening their situation while waiting for housing and services, and to substantially reduce the vacancy rates of housing available. (HSH; Short)
- h. Expand the capacity of low barrier access, high service temporary shelter models, such as non-congregate shelter options and Navigation Center beds. Aim to increase temporary shelter

investments in proportion³⁴ to Permanent Supportive Housing and homelessness prevention investments to improve the rate of successful exits to stable housing. (HSH; Medium)

- i. Evaluate the needs for and create more types of shelters in the system with amenities and services tailored to their residents, examples could include wellness hubs, 'clean and sober' shelters, safe consumption shelters for legal and illegal substances, non-congregate shelters, transgender shelters, and off-street safe parking sites for those vehicle dwellers seeking conventional housing. (HSH; Medium)
- j. Secure and advocate for additional funding for building and operation of Permanent Supportive Housing from State and federal sources. (HSH; Medium)
- k. Provide housing navigation services and stability case management to people experiencing homelessness using rental assistance programs (e.g., Housing Choice Vouchers) during the housing search stage and ongoing to ensure tenant retention. (MOHCD, HSH; Short)
- l. Create and expand incentives for private landlords to use rental assistance programs (e.g., Housing Choice Vouchers) to rent their units to extremely and very low-income households. Incentives could include covering lease up fees, rent payment during the inspection period, providing tenant support for housing retention, and covering unit damage upon separation, as well as establishing a fund to support these incentives. (SFHA, MOHCD, HSH; Short)
- m. Strengthen the Housing Ladder³⁵ strategy to support residents of Permanent Supportive Housing to move to less-supportive settings, freeing up supportive housing units for unhoused people. Actions include revising San Francisco Housing Authority preference system to grant higher preference to these households in using direct rental assistance or other available subsidies or creating a new City-supported shallow subsidy for these households. (SFHA, HSH, MOHCD; Medium)
- n. Support and fund the San Francisco Ending Trans Homelessness Plan to end homelessness for transgender people in recognition of the severe disparities in housing access and safety experienced by this group. (HSH, OTI, MOHCD; Short)

34 All Home Plan recommends a proportion of 1-2-4 where for each four units of permanently supportive housing, two shelter beds and interim-housing options are added, along with homelessness prevention services for one individual. [210413_Regional_Action_Plan_Final.pdf](#) (allhomeca.org)

35 A rehousing approach that offers opportunities for residents of Permanent Supportive Housing (PSH) to move from intensive supportive housing to more independent living, thus freeing up their PSH unit for others.

POLICY 9: Prevent homelessness and eviction through comprehensive evidence-based systems, including housing and other services targeted to serve those at risk of becoming unhoused³⁶.

Objective 1.A Ensure housing stability and healthy homes.

Objective 1.B Advance equitable housing access.

Objective 1.C Eliminate homelessness.

Implementing Program Areas: Accessible and Affordable Housing; Antidisplacement and Tenant Support; Empowerment of Equity Priority Communities; Homeless Prevention and Elimination; Vulnerable Groups

Actions

- a. Prioritize those at risk of becoming unhoused for homeless prevention investments, such as flexible financial assistance or Step Up to Freedom³⁷ program and other programs that offer a continuum of care and wrap around services in addition to housing. (HSH, MOHCD, APD; Short)
- b. Increase the timeframe during which time-limited rental assistance is offered, through programs such as Rapid Rehousing,³⁸ to enable households to secure stable employment. (HSH, MOHCD; Short)
- c. Provide adequate legal services to support eviction prevention including support for rent increase hearings, habitability issues, or tenancy hearings with the Housing Authority. (MOHCD; Short)
- d. Expand tenant and project-based rental assistance programs, including federal, state and local operating subsidy programs, to meet the needs of extremely and very low-income households and households with fixed incomes, such as seniors and people with disabilities, as also referenced in Policy 1, actions (c), (d), and (e). (HSH, SFHA, MOHCD; Short)
- e. Expand the timeline during which transitional housing programs³⁹ are offered for people coming out of jails, prisons, immigration detention centers, and substance use treatment. (APD, HSH, DPH, MOHCD; Short)
- f. Expand and improve services for mental health and substance use care, social work, and other supportive services for residents of Permanent Supportive Housing, and those at risk of becoming unhoused.⁴⁰ (HSH, DPH; Medium)

36 People with prior experience of homelessness, with involvement with the criminal justice system, extremely-low and very-low income American Indian, Black, and Latino/es, domestic violence victims, transgender people, and those at imminent risk of losing housing (e.g. tenants with an eviction notice or subject to landlord harassment).

37 Step Up to Freedom is a reentry rapid rehousing and rental subsidy program for justice involved unstably housed/homeless adults who are between the ages of 18 – 35 years on parole or post release supervision.

38 A set of interventions that provides people with grants to pay for living expenses like first and last month's rent managed by the SF Department of Homelessness and Supportive Housing.

39 A list of transitional housing programs run by the San Francisco Adult Probation Office is catalogued [here](#).

40 People with prior experience of homelessness, with involvement with the criminal justice system, extremely-low and very-low income American Indian, Black, and Latinos/es/x, domestic violence victims, those at imminent risk of losing housing (for example with an eviction notice, or subject to landlord harassment).

- g. Expand on-site case management services that focus on removing barriers to housing stability to support non-profit housing providers in preventing evictions of their tenants. (HSH, MOHCD, APD; Medium)
- h. Expand housing retention requirements to prevent evictions and support tenants of non-profit housing. (MOHCD, HSH; Short)
- i. Continue to provide mobile services for residents in scattered-site supportive housing, for example the new Flexible Housing Subsidy Pool program. (HSH, DPH; ongoing)
- j. Adopt Trauma-Informed Systems⁴¹ with robust training resources and increase cultural competency training specific to transgender and LGBTQ+ populations for all service providers and property managers in the City's affordable housing projects and Homeless Response System. (DPH, HSH, MOHCD, APD; Medium)
- k. Improve programs intended to transfer people experiencing violent crime and domestic violence to safe housing. (HSH, MOHCD, DSW, SFHA; Short)
- l. Strengthen the housing navigation services by assigning a support counselor, with similar lived experience, to an individual regardless of where that person lives instead of being tied to a particular location, so that consistent support continues through residential transitions. (HSH, APD; Short)
- m. As a prevention partner to the regional All Home Plan⁴², help create a regional homeless response system to share data across systems, and administer the increased funds from local, State, and federal agencies. (HSH, MOHCD; Short)
- n. Expand short term medical recovery housing programs for unhoused transgender people, such as is offered by Maitri, so that transgender people can access medical care by meeting the public health system requirement for stable housing prior to undergoing gender-affirming surgeries. (HSH; Short)
- o. Allocate resources to population-specific programs outside of the Homelessness Response System in acknowledgement that transgender and LGBTQ+ communities do not currently access the system because of safety and discrimination concerns. (HSH; Short)

41 The TIS Initiative at the San Francisco Department of Public Health (SFDPH) is an organizational change model to support organizations to respond to and reduce the impact of trauma.

42 Reference to: [210413_Regional_Action_Plan_Final.pdf](#) (allhomeca.org)

POLICY 10: Acknowledge the truth about discriminatory practices and government actions⁴³ as told by American Indian, Black, and other communities of color to understand the root causes of the housing disparities in these communities and to inform how to redress the harms.

Objective 2.A Make amends through truth-telling of the historic harms.

Implementing Program Areas: Redressing Harm

Actions

- a. Commission an American Indian community-led study to document the discriminatory practices and government actions against American Indian communities including the Indian Relocation Act of 1956 and the cumulative impacts of genocide, exploitation, and dispossession of resources in terms of wealth loss, disparate housing and health outcomes, and scale of displacement. (Planning, HRC; Short)
- b. Commission a community-led study by affected communities, including American Indian, Black, and other communities of color, to document the history of [redlining](#), racial covenants, and exclusionary zoning practices in San Francisco and their cumulative impacts, particularly on Black households, in terms wealth-loss, disparate housing and health outcomes, and scale of displacement. (Planning, HRC; Short)
- c. Commission a community-led study by affected communities, including American Indian, Black, and other communities of color, to document the history of [urban renewal](#) in San Francisco and its cumulative impacts, particularly on Black households, in terms wealth loss, disparate housing and health outcomes, and scale of displacement. (Planning, HRC; Short)
- d. Commission a community-led study by affected communities to document the history of public housing replacement in San Francisco and its impacts, particularly on Black households, in terms of wealth loss, disparate housing and health outcomes, and scale of displacement. (Planning, HRC; Short)
- e. Commission a community-led study by affected communities to document the history of predatory lending practices in San Francisco and its impacts in terms of wealth loss, disparate housing and health outcomes, and scale of displacement. (Planning, HRC; Short)
- f. Report on the cumulative impacts to American Indian, Black, and other communities of color resulting from discriminatory practices and government actions as understood from the studies called for in Policy 10, actions (a) through (e) to present a holistic view of the harms incurred and redress the harms comprehensively. (Planning, HRC; Long)

⁴³ Discriminatory programs include, but are not limited to, redlining, urban renewal, segregated public housing, and exclusionary zoning regulations, such as single-family zoning.

- g. Incorporate findings from the studies called for in Policy 10, actions (a) through (e), including the resulting disparities and inequities, when applying the Planning Department's racial and social equity assessment tool⁴⁴ to applicable projects. (Planning; Short).
- h. Incorporate relevant findings of the studies called for in Policy 10, actions (a) through (e) in city decision documents for actions intended to repair past racial and social harm. (Planning; Short).

44 An analysis approach to assessing the potential racial and social equity impacts of a proposed action. This tool is part of San Francisco Planning's Racial and Social Equity Action Plan, which aims to pro-actively advance equity in the Department's internal and external work such as community planning, community engagement, policy/laws development, hiring, and process improvements. At the time of publication (March 2022), this tool is still being developed.

POLICY 11: Establish and sustain homeownership programs and expand affordable housing access for American Indian, Black, Japanese, Filipino, and other communities to redress harm directly caused by past discriminatory government actions including [redlining](#), [urban renewal](#), the Indian Relocation Act, or WWII Japanese incarceration.

Objective 2.B	Offer reparations for communities directly harmed by past discriminatory government action and bring back their displaced people.
Objective 3.A	Build intergenerational wealth for American Indian, Black, and other communities of color.
Objective 3.C	Eliminate community displacement within areas vulnerable to displacement.

Implementing Program Areas: Redressing Harm

Actions

- i. Prioritize American Indian residents for housing opportunities to redress the historic dispossession of resources affecting these communities, such as by the Indian Relocation Act, and other government actions that broke the cohesion of this community. (Mayor/BOS; Short)
- a. Establish pilot and permanent programs that offer homeownership opportunities targeted to Black communities harmed through [redlining](#) or [urban renewal](#), including Black individuals and their descendants who hold [Certificates of Preference](#) from the urban renewal period, as referenced in Policy 5, actions (e) and (f). Building on the [Dream Keeper initiative](#), such programs should include silent second loans or grants for down payment assistance, as well as other financial assistance to reduce income eligibility as a barrier to access homeownership opportunities. (MOHCD; Medium)
- b. Upon completion of the pilot programs for Black communities cited in Policy 11, action (b), evaluate and extend the programs to other communities directly harmed by discriminatory government actions.⁴⁵ (MOHCD; Short)
- c. Target increased investment in the Down Payment Assistance Loan Program to American Indian, Black, Japanese, Filipino, and other communities directly harmed by [redlining](#) or [urban renewal](#) or by other discriminatory government actions. (MOHCD; Short)
- d. Implement the right to return legislation for residents of public housing including opportunities to those previously displaced. (MOHCD; Medium)
- e. Pursue expanding and modifying the shared equity homeownership and land trust models, to address their effectiveness and scalability, for communities harmed by past discrimination. Use the findings of the study referenced in Policy 3, action (c) to inform expansion of these models. (MOHCD, Planning; Medium)
- f. Create and pilot programs to increase access to Affordable Rental and Homeownership units as redress for American Indian, Black, Japanese, Filipino, and other communities directly harmed by

45 Discriminatory programs include, but are not limited to, redlining, urban renewal, segregated public housing, and exclusionary zoning regulations, such as single-family zoning.

past discriminatory government actions including [redlining](#), [urban renewal](#), the Indian Relocation Act, or WWII Japanese incarceration. (MOHCD, Planning, HRC; Short)

- g. Expand and fund community capacity to implement housing programs and investments for American Indian residents as one strategy to redress the historic dispossession of resources affecting these communities, such as the Indian Relocation Act, and other government actions that broke the cohesion of this community. (Planning, MOHCD; Short)

POLICY 12: Invest in and expand access to cultural anchors, land, and spaces that are significant to American Indian, Black, Japanese, Filipino, and other communities directly harmed by past discriminatory government actions including [redlining](#), [urban renewal](#), the Indian Relocation Act or WWII Japanese incarceration to redress histories of dispossession, social disruption, and physical displacement.

Objective 2.B	Offer reparations for communities directly harmed by past discriminatory government action and bring back their displaced people.
Objective 3.A	Build intergenerational wealth for American Indian, Black, and other communities of color.
Objective 5.C	Elevate expression of cultural identities through the design of active and engaging neighborhood buildings and spaces.

Implementing Program Areas: Cultural Stability, Redressing Harm

Actions

- In recognition of the removal of American Indians from their ancestral lands, identify opportunities to restore access to land for traditional cultural and ceremonial uses and to invest in spaces for the American Indian community to participate in traditional cultural practices and convene community gatherings. (MOHCD, Mayor/Board, RED; Short)
- In recognition of the disproportionate loss of Black residents from San Francisco in recent decades resulting in part from a culmination of discriminatory government actions, identify opportunities to donate or dedicate land for use by Black-led, community-serving organizations. (MOHCD, Mayor/Board, RED; Short)
- Strengthen interagency coordination to ensure that [Cultural District](#) strategies related to the creation or improvement of cultural anchors and spaces are integrated into planning, funding, and construction and/or rehabilitation of public projects (e.g., parks and open spaces, street improvements, libraries, and transit facilities). (Planning, MOHCD, OEWD; Short)
- Fund the development and implementation of community-led strategies in [Cultural Districts](#) to retain and grow culturally associated businesses and services that attract residents back to the area. (MOHCD, OEWD, OSB, Planning; Short)
- Recognize spaces of cultural importance identified by American Indian, Black, Japanese, Filipino, and other communities directly harmed by discriminatory government actions in community planning and regulatory review for development projects, consult them in decisions affecting those spaces, and direct resources towards their preservation and management. (Planning, OEWD, OSB; Short)
- Fund the development of cultural spaces that serve communities harmed as described under this policy, using potential new funding sources such as the mitigation fund referenced under Policy 42, action (c) or community facilities fees. (MOHCD, Planning, OEWD; Medium)
- Explore utilizing the [Legacy Business Registry](#) program to direct resources to businesses and not-for-profit organizations associated with American Indian, Black, Japanese, Filipino, and other communities directly harmed by discriminatory government actions. (OSB, OEWD; Short)

POLICY 13: Amplify and prioritize voices of American Indian, Black, and other people of color, and other disadvantaged communities, and embrace the guidance of their leaders throughout the engagement and planning processes for housing policy, planning, programs, and developments.

Objective 2.C Increase accountability to American Indian, Black, and other communities of color.

Implementing Program Areas: Cultural Stability; Empowerment of Equity Priority Communities; Redressing Harm

Actions

- a. Develop and implement community engagement strategies that center racial and social equity and cultural competency to be used by Planning Department staff as well as developers or community groups. (Planning; Short)
- b. Update the Planning Code and Planning Department protocols where necessary to reflect strategies developed in Policy 13, action (a), this includes updating Planning Department requirements for project sponsors to engage with interested [Cultural Districts](#) to allow these communities to provide input upon initiation of a project application and to allow the project sponsor adequate time to address the input through dialogue or project revisions. (Planning; Short)
- c. Increase resources and funding to partner with community-based organizations primarily serving and representing American Indian, Black, and other people of color, and other disadvantaged communities for inclusive outreach and engagement and meaningful participation in planning processes related to housing through focus groups, surveys, and other outreach events (Planning, Mayor/BOS; Medium)
- d. Develop and implement guidelines, and update the municipal codes where needed, to ensure elevated representation of American Indian, Black, and other people of color, and other disadvantaged communities in decision-making or advisory bodies such as Community Advisory Councils (CACs). (Planning; Medium)
- e. Improve consultation with local Native Ohlone representatives, including the Association of Ramaytush Ohlone representatives, and American Indian residents in policy development and project review regarding tribal and cultural resource identification, treatment, and management while compensating them for their knowledge and efforts. Improvements should include commissioning the development of community-led, culturally relevant guidelines for identifying and protecting tribal and cultural resources and identifying funding sources for cultural resource identification, treatment and management. (Planning; Short)
- f. Identify and implement housing strategies recommended by advisory bodies primarily serving and representing American Indian, Black, and other people of color, and other disadvantaged communities such as the African American Reparations Advisory Committee and the Transgender Advisory Committee. (Planning, MOHCD; Medium)

POLICY 14: Establish accountability tools to advance racial and social equity in housing access with measurable progress.

Objective 2.C Increase accountability to American Indian, Black, and other communities of color.

Implementing Program Areas: Access to Housing; Empowerment of Equity Priority Communities

Actions

- a. Develop and align citywide metrics that measure progress towards beneficial outcomes for American Indian, Black, and other people of color, and other disadvantaged communities resulting from housing policies using methods consistent with the San Francisco Equity Index prepared by the Office of Racial Equity. (Planning, ORE; Medium)
- b. Identify and fund liaisons within key City agencies such as MOHCD and Planning to support the housing needs and priorities of American Indian, Black, and other people of color, and other disadvantaged communities; such liaisons should provide regular check-ins with the community at centralized community spaces and reporting on Housing Element Implementation Program progress. (Planning, MOHCD; Short)
- c. Identify priority actions in the Housing Element Implementation Program that respond to the needs of American Indian, Black, and other people of color, and other disadvantaged communities, through collaboration with [Cultural Districts](#) or other racial and social equity-focused community bodies such as the Community Equity Advisory Council or the African American Reparations Committee. Report back to communities on the progress of those priority actions and update prioritization every two years. (Planning, MOHCD; Medium)
- d. Establish an inter-agency Housing Element implementation committee, who convenes meetings with community advisor members representing racial and social equity-focused bodies as cited in Policy 14, action (c), to inform the City's budget and work program on housing equity. The committee would be responsible for reporting progress measured in actions (a) and (c) to the Planning Commission and Mayor's Office and for identifying financial or legal challenges to progress. (Planning, MOHCD, HRC; Short)
- e. Monitor and shape housing investments, including permanently affordable housing production, preservation, and housing services, through the Capital Planning process cited in Policy 22, action (d) so that resource allocation is accountable to the community priority actions identified in Policy 14, action (c). (Planning, MOHCD; Short)
- f. Expand [DAHLIA](#) to improve data collection on communities being served by various housing services, including rental assistance, affordable housing lotteries, vouchers, and public housing. (MOHCD, Digital Services, SFHA, HSH; Short)

POLICY 15: Expand permanently affordable housing investments in [Priority Equity Geographies](#) to better serve American Indian, Black, and other People of color within income ranges underserved, including extremely-, very low-, and moderate-income households.

Objective 3.A Build intergenerational wealth for American Indian, Black, and other communities of color.

Objective 4.A Substantially expand the amount of permanently affordable housing for extremely low- to moderate-income households.

Implementing Program Areas: Access to Housing; Accessible and Affordable Housing; Empowerment of Equity Priority Communities

Actions

- a. Increase production of housing affordable to extremely and very low-income households including identifying and deploying subsidy resources necessary to serve these income groups. (MOHCD, HSH; Medium)
- b. Maximize the use of ongoing tenant-based rental assistance to expand eligibility for extremely and very low-income households who otherwise do not qualify for Below Market Rate units. (MOHCD; Short)
- c. Evaluate increasing [neighborhood preference](#) allocation for Below Market Rate units in [Priority Equity Geographies](#) to better serve American Indian, Black, and other communities of color, if possible, per the Federal Fair Housing regulations, as informed by Policy 5 and underlying actions. (MOHCD; Short)
- d. Support the development and implementation of community-led plans in the Tenderloin, the Fillmore, and Japantown. (Planning, MOHCD; Short)
- e. Support implementation of Mission Action Plan 2020 (MAP2020) and Sustainable Chinatown and as updated from time to time in order to meet its affordable housing production and preservation targets. (MOHCD, Planning; Short)
- f. Support and expedite delivery of the permanently affordable housing projects in Redevelopment Areas led by the Office of Community Investment and Infrastructure (OCII). (Planning; ongoing)
- g. Continue to rebuild and replace public housing units at HOPE SF sites without displacement of the current residents. (MOHCD; Medium)

POLICY 16: Improve access to well-paid jobs and business ownership for American Indian, Black and other communities of color, particularly those who live in [Priority Equity Geographies](#), to build the wealth needed to afford and meet their housing needs.

Objective 3.A Build intergenerational wealth for American Indian, Black, and other communities of color.

Implementing Program Areas: Accessible and Affordable Housing; Cultural Stability; Thriving Communities

Actions

- a. Expand and target job training, financial readiness education programs to residents of [Priority Equity Geographies](#) including youth from American Indian, Black and other communities of color. (OEWD, MOHCD, ORE; Medium)
- b. Support developers of new permanently affordable housing developments in [Priority Equity Geographies](#) to include affordable community serving uses such as grocery stores, healthcare clinics, or institutional community uses such as child-care facilities, community facilities, job training centers, social services as part of their ground floor use programming. (MOHCD, Mayor/BOS; Medium)
- c. Adopt commercial space guidelines to encourage the development of businesses owned by American Indian, Black and other people of color in permanently affordable housing buildings. (MOHCD, OEWD, ORE; Short)
- d. Provide resources for tenant improvements for businesses owned by American Indian, Black, and other people of color in permanently affordable housing buildings. (OEWD, MOHCD, ORE; Medium)
- e. Expand capacity-building, job training, start-up, and business development resources for Black business owners in development and contracting construction trades in support of building housing. (OEWD, MOHCD, ORE; Medium)
- f. Grow a range of business and career-building opportunities in [Priority Equity Geographies](#) through resources to support affordable Production, Distribution, and Repair (PDR) space, protections and incentives for PDR in the Planning Code, enforcement of PDR zoning, and industrial (or commercial) design guidelines. (OEWD; Planning; Medium)

POLICY 17: Expand investments in [Priority Equity Geographies](#) to advance equitable access to resources while ensuring community stability.

- Objective 3.A

Build intergenerational wealth for American Indian, Black, and other communities of color.
- Objective 5.A

Connect people to jobs and their neighborhood with numerous, equitable, and healthy transportation and mobility options.

Implementing Program Areas: Antidisplacement and Tenant Support; Infrastructure and Community Services; Thriving Communities

Actions

- a. Apply equity metrics identified under Policy 14 (a) in identifying necessary infrastructure improvements for [Priority Equity Geographies](#) and to guide all City investment decisions, including but not limited to: Capital Planning, General Plan Elements, Interagency Plan Implementation Committee or Citizen Advisory Council review, in coordination with Policy 38 actions (a) through (c). (Planning, SFMTA, RPD, DPW; Short)
- b. Target [Priority Equity Geographies](#) for investments to improve transit service, as well as other community improvements to parks, streetscape, and neighborhood amenities, in coordination with the investments referenced under Policy 38, action (c). (Planning, SFMTA, RPD, DPW; Medium)
- c. Invest in and implement anti-displacement measures in parallel with major infrastructure improvements in areas undergoing displacement, as informed by Policy 21, actions (a) and (b). (Planning, SFMTA, RPD, DPW; Medium)

POLICY 18: Tailor zoning changes within [Priority Equity Geographies](#) and intersecting Cultural Districts to serve the specific needs of American Indian, Black, and other communities of color while implementing programs to stabilize communities and meet community needs.

Objective 2.C Increase accountability to American Indian, Black, and other communities of color.

Objective 3.A Build intergenerational wealth for American Indian, Black, and other communities of color.

Objective 3.C Eliminate community displacement within areas vulnerable to displacement.

Implementing Program Areas: Antidisplacement and Tenant Support; Empowerment of Equity Priority Communities

Actions

- a. Identify and adopt zoning changes that implement priorities of American Indian, Black, and other communities of color identified in [Cultural District](#) or other community-led processes within [Priority Equity Geographies](#). (Planning; Medium)
- b. Consult with related [Cultural Districts](#) or other racial equity-focused community bodies such as the Community Equity Advisory Council to evaluate the racial and social equity impacts of proposed zoning changes within [Priority Equity Geographies](#), using the framework identified under Policy 21, actions (a) and (b). (Planning; Medium)
- c. Allocate resources and create an implementation plan for any applicable anti-displacement measures parallel with the adoption of zoning changes within [Priority Equity Geographies](#). (Planning; Medium)

POLICY 19: Enable low and moderate-income households, particularly American Indian, Black, and other people of color, to live and prosper in [Well-resourced Neighborhoods](#) by increasing the number of permanently affordable housing units in those neighborhoods.

Objective 3.B Create a sense of belonging for all communities of color within Well-resourced neighborhoods through expanded housing choice.

Objective 4.A Substantially expand the amount of permanently affordable housing for extremely low- to moderate-income households.

Implementing Program Areas: Access to Housing; Accessible and Affordable Housing

Actions

- a. Build between 25% and 50% of the City's new permanently affordable housing within [Well-resourced Neighborhoods](#) within the next two RHNA cycles, implementing the zoning strategies of Policy 20. (MOHCD, Planning; Medium)
- b. Increase housing that is affordable to extremely low and very low-income households in [Well-resourced Neighborhoods](#) through City funded permanently affordable housing projects. (MOHCD; Long)
- c. Create a funded land banking program to purchase either individual lots or lots for consolidation that could accommodate at least 50 units on sites in [Well-resourced Neighborhoods](#), such as sites owned by religious institutions, parking on public land, or underutilized sites. (Planning, MOHCD, Mayor/BOS; Medium)
- d. Pursue partnerships with religious institutions, or other philanthropic or private property owners, and non-profit developers in [Well-resourced Neighborhoods](#) to identify and support development of sites that could accommodate new permanently affordable housing, shared equity or cooperative models as referenced under Policy 23, action (a). (Planning, MOHCD, OEWD; Medium)
- e. Create programs that provide case management, financial literacy education, and housing readiness to low-income American Indian, Black and other people of color households who seek housing choices in [Well-resourced Neighborhoods](#), and provide incentives and counseling to landlords in [Well-resourced Neighborhoods](#) to offer units to low-income households. Consider similar incentives referenced in Policy 8, action (m). (MOHCD; Medium)

POLICY 20: Increase mid-rise and small multi-family housing types by adopting zoning changes or density bonus programs in [Well-resourced Neighborhoods](#) and adjacent lower-density areas near transit, including along SFMTA Rapid Network⁴⁷ and other transit.

Objective 3.B	Create a sense of belonging for all communities of color within Well-resourced neighborhoods through expanded housing choice.
Objective 4.B	Expand small and mid-rise multi-family housing production to serve our workforce, prioritizing middle-income households.
Objective 5.A	Connect people to jobs and their neighborhood with numerous, equitable, and healthy transportation and mobility options.

Implementing Program Areas: Facilitation of Diverse Housing Types; Reduction of Constraints for Housing Development, Maintenance and Improvement

Actions

- a. Increase the opportunity for mid-rise multi-family buildings in [Well-resourced Neighborhoods](#) through changes to height limits, removal of density controls, and other zoning changes along SFMTA's Muni Forward Rapid Network⁴⁸ and other transit lines such as California Street, Union Street, Lombard Street, Geary Blvd, Judah Street, Noriega Street, Ocean Ave, Taraval Street, Sloat Blvd, 19th Ave, Park Presidio Blvd, West Portal Ave, Junipero Serra Blvd, Church Street, Divisadero Street, 17th and Market/Castro, and Van Ness Ave. In areas that overlap with [Priority Equity Geographies](#), such as the Japantown Cultural District, any potential zoning changes should come through community-led processes per Policies 18 and 29. (Planning, Mayor/BOS; Medium)
- b. Increase the opportunity to create more small multi-family buildings by replacing lot-based unit maximum zoning controls with form-based residential or mixed-use zoning in [Well-resourced Neighborhoods](#) near transit. (Planning, Mayor/BOS; Medium)
- c. Create a rezoning program to meet the requirements of San Francisco's Regional Housing Needs Allocation and Affirmatively Furthering Fair Housing laws, relying on a combination of strategies in actions (a) and (b) above to accommodate approximately 34,000 new units in [Well-resourced Neighborhoods](#). Complete this effort by January 31, 2026. (Planning, Mayor/BOS; Medium)
- d. Engage with communities living in [Well-resourced Neighborhoods](#) to inform existing residents how locating new housing and permanently affordable housing in every neighborhood can address historic inequity and injustice and expand housing opportunities for local residents and their families while strengthening neighborhood vitality. (Planning; Short)

47 The 13 rail and bus lines that account for the majority of Muni's ridership. Before the pandemic, Rapid Network lines were scheduled to operate every 10 minutes or better all day on weekdays.

48 The 13 rail and bus lines that account for the majority of Muni's ridership. Before the pandemic, Rapid Network lines were scheduled to operate every 10 minutes or better all day on weekdays.

POLICY 21: Prevent the potential displacement and adverse racial and social equity impacts of zoning changes, planning processes, or public and private investments especially for populations and [areas vulnerable to displacement](#).

Objective 2.C Increase accountability to American Indian, Black, and other communities of color.

Objective 3.C Eliminate community displacement within areas vulnerable to displacement.

Implementing Program Areas: Antidisplacement and Tenant Support

Actions

- a. Based on the Racial and Social Equity Impact Analysis for the Housing Element,⁴⁹ target levels of investments to prevent community displacement through increased permanently affordable housing production, equitable access to housing, and other community stabilization strategies for vulnerable populations. (Planning; Short)
- b. Create benchmarks for affordable housing production and preservation investments to avoid displacement and other adverse racial and social equity impacts for future zoning changes, development projects and infrastructure projects according to the scale and location of the proposal, as informed by the Racial and Social Equity Impact Analysis for the Housing Element. (Planning; Short)
- c. Invest public funding or direct private investment to implement the anti-displacement investments identified in Policy 21, action (b) for zoning changes, development projects, or infrastructure projects of certain scale or intensity, in parallel with the project timeline. (MOHCD, SFMTA, OEWD, DPW; Medium)
- d. Increase funding to expand the services of community-based organizations and providers for financial counseling services listed under Policy 5, action (i), as well as tenant and eviction protection services listed under Policy 1, to better serve populations and [areas vulnerable to displacement](#); tenant and eviction protection services include legal services, code enforcement outreach, tenant counseling, mediation, and housing-related financial assistance; expansion of such services should be informed by community priorities working with liaisons referenced under Policy 14, action (b). (MOHCD, Mayor/BOS; Short)

⁴⁹ The Racial and Social Equity Impact analysis of the Housing Element will be completed prior to the adoption of the Housing Element 2022, and this action will be updated based on the findings accordingly.

POLICY 22: Create dedicated and consistent local funding sources and advocate for regional, State, and Federal funding to support building permanently affordable housing for very low-, low-, and moderate-income households that meets the Regional Housing Needs Allocation targets.

- Objective 1.C Eliminate homelessness.
- Objective 4.A Substantially expand the amount of permanently affordable housing for extremely low- to moderate-income households.

Implementing Program Areas: Accessible and Affordable Housing

Actions

- a. Convene City leadership, staff, policymakers, affordable housing advocates, and industry experts to collaborate on an Affordable Housing Implementation and Funding Strategy that provides specific recommendations and responsible parties to achieve and sustain the substantial public funding, that would join with public-private partnerships, needed to support the RHNA targets of over 46,000 moderate and low-income units. Complete this effort by January 31, 2024. (Planning, MOHCD, Mayor/BOS; Short)
- b. Incorporate affordable housing investments in the annual funding and Capital Planning process by identifying existing housing funding sources, housing funding gaps and potential new funding sources, including local bonds or others that require voter approval. (MOHCD, Mayor/BOS; Short)
- c. Create a budgeting tool for tracking housing investments, including permanently affordable housing production, preservation, and housing services; tracking investments that advance community identified priority actions, per Policy 14, action (c); and, tracking investments that advance racial and social equity, per Policy 14, action (a). (Planning, MOHCD, Mayor/BOS; Short)
- d. Dedicate funding within the 10-year Capital Planning process for permanently affordable housing in [Priority Equity Geographies](#) with a goal of building planned projects, while reaching the minimum targets in [Well-resourced Neighborhoods](#) as referenced in Policy 19, action (a). (Mayor/BOS, MOHCD; Long)
- e. Explore the development of public financing tools such as Infrastructure Finance Districts to leverage the City’s co-investments in order to lower direct City subsidy for permanently affordable housing. (OEWD; Medium)
- f. Develop and support alternative and philanthropic funding sources to deliver permanently affordable housing faster and at a cheaper per unit cost through tools such as the [Housing Accelerator Fund](#). (Planning, MOHCD; Medium)
- g. Support the Bay Area Housing Financing Authority’s expected efforts to secure voter approval for a regional measure to fund permanently affordable housing. (MOHCD, Planning; Medium)
- h. Advocate for federal legislation to increase Low-Income Housing Tax Credits and Private Activity Bonds, for example, by changing federal rules to lower the minimum bond financing needed to access 4% LIHTC (currently 50 percent) to help unlock more LIHTC in San Francisco and statewide. (MOHCD, Planning; Short)

- i. Advocate for State legislation to change the voter approval threshold for General Obligation Bonds from two-thirds to 50 percent. (Planning, Mayor/BOS; Medium)
 - j. Advocate for State legislation to expand non-competitive permanently affordable housing funding sources. (Planning, Mayor/BOS; Medium)
 - k. Collaborate with key organizations to reform Proposition 13⁵⁰ for commercial property to provide funding support for local jurisdictions to meet their permanently affordable housing targets. (Planning, Mayor/BOS; Medium)
 - l. Develop land acquisition process and program that permits inexpensive long-term leases for land developed with high affordability. (Planning, Mayor/BOS; Medium)
 - m. Assess the City's capacity to finance a revenue-neutral, mixed-use, [social housing](#) program. (Planning, Mayor/BOS; Medium)
-

50 A 1978 ballot measure that reduced property tax rates on homes, businesses and farms, and capped assessed property taxes at 1% for assessed values with no more than 2% annual increase. Prop 13 significantly reduced the tax revenue of local jurisdictions to fund schools, services, and infrastructure.

POLICY 23: Retain and increase the number of moderate- and middle-income households by increasing their homebuying opportunities and reversing the shortage in housing that is affordable for these households.

Objective 4.A Substantially expand the amount of permanently affordable housing for extremely low- to moderate-income households.

Implementing Program Areas: Access to Housing; Facilitation of Diverse Housing Types

Actions

- a. Study and implement expansion of shared equity models that offer moderate- and middle-income homeownership (such as Shared Equity, land trusts, or cooperative ownership) through development of smaller sized lots. Use the studies cited in Policy 3, action (c), and Policy 11, action (f) to inform expansion of these models and pursue partnership with private and philanthropic property owners referenced under Policy 19, action (d). (MOHCD, Planning; Short)
- b. Study and implement expansions to programs that create workforce housing for educators to serve other public-sector essential workers such as transit operators and hospital workers. (Planning, MOHCD, Mayor/BOS; Short)
- c. Fund the First Responders Down Payment Assistance Loan Program and the SFUSD Educators Down Payment Assistance Loan Program. (MOHCD; ongoing)
- d. Promote location-efficient mortgage and energy-efficient mortgage programs as a tool for expanding the purchasing power of residents while incentivizing more sustainable trip choices and energy efficient building practices. (MOHCD; Medium)

POLICY 24: Enable mixed-income development projects to maximize the number of permanently affordable housing constructed, in balance with delivering other permanent community benefits that advance racial and social equity.

Objective 4.A Substantially expand the amount of permanently affordable housing for extremely low- to moderate-income households.

Implementing Program Areas: Accessible and Affordable Housing; Infrastructure and Community Services; Reduction of Constraints for Housing Development, Maintenance and Improvement

Actions

- a. Through the Inclusionary Technical Analysis Committee, study a new more regular and systematic methodology for evaluating the [inclusionary rates](#) so they are better tied to local conditions and can maximize total number of Below Market Rate units delivered without public subsidy, in balance with the directions of Policy 5, action (b). (Planning, MOHCD; Medium)
- b. Simplify inclusionary tiers and requirements to address financial feasibility, increase certainty for housing projects, and reduce staff time and specific expertise. (Planning, Controller's Office, MOHCD; Medium)
- c. Modify proximity inclusionary requirement to allow for more flexibility in offsite 100% affordable housing, for example in [Priority Equity Geographies](#) regardless of market-rate project site location. (Planning; Medium)
- d. Explore the possibility of additional height increases and density limit removal at major transit nodes along Rapid bus and rail corridors, in addition to areas referenced in Policy 20, in parallel with needed infrastructure improvements and maximizing permanently affordable housing units. (Planning; Medium)
- e. Encourage housing project applications that maximize density and height under existing zoning and regulatory programs as that will result in the production of more permanently affordable housing units, as informed by the racial and social equity impact analysis referenced in Policy 21, actions (a) and (b). (Planning; Short)
- f. Expand the Public Sites for Housing Program through public-private partnerships and utilize City resources to support the maximum number of permanently affordable housing units on underutilized publicly owned and surplus sites, balancing the financial needs of enterprise agencies, and ensuring adequate space and resources to address the gaps in community infrastructure, services and amenities. (Planning, OEWD, MOHCD; Long)
- g. Support the maximum number of permanently affordable housing units as well as improved transit facilities on SFMTA owned sites slated for development through leveraging private investment in market-rate units with public funding. (Planning, OWED, SFMTA, MOHCD; Medium)
- h. Create new pathway for onsite inclusionary at 80-120 AMI levels in Well-resourced Neighborhoods to reduce the financial burden on small, multifamily projects and create more workforce housing. (Planning, MOHCD; Long)

- i. Prioritize maximum permanently affordable housing units as an essential benefit of new mixed-use development agreements alongside other benefits such as community facilities and transit investments. (OEWD, Planning; ongoing)
- j. Incentivize development projects to exceed the [required inclusionary percentages](#) to maximize the total number of Below Market Rate units via density bonus programs or regulatory paths through streamlined approval as defined in Policy 25. (Planning; Short)
- k. Enable public-private partnership solutions to front-end the necessary funding for infrastructure investments to expedite housing for large master plans and development agreements with major up front infrastructure needs, such as Treasure Island, Candlestick Point, Mission Bay, Hunters Point Shipyard, Parkmerced, and Schlage Lock/Bayland North. Solutions could include Infrastructure Financy Districts, Tax Increment Financing, or other methods to provide direct City investment, allocation of public financing, or issuance of other public debt. (OEWD, DPW; Medium)
- l. Partner with affordable housing developers to purchase privately-owned entitled sites where construction may be stalling. (MOHCD, Mayor/BOS; Short)
- m. Advocate for regional and State funds through the existing infrastructure bank or other paths to help finance the infrastructure needs of large urban infill and redevelopment projects. (Planning, OEWD, Mayor/BOS; Medium)

POLICY 25: Reduce governmental constraints on development in Well-resourced Neighborhoods to enable small and mid-rise multi-family buildings providing improved housing choice and affordability.

Objective 4.B Expand small and mid-rise multi-family housing production to serve our workforce, prioritizing middle-income households.

Implementing Program Areas: Reduction of Constraints for Housing Development, Maintenance and Improvement

Actions

- a. Establish local ministerial approval⁵¹ for housing applications in [Well-resourced Neighborhoods](#) outside of [areas vulnerable to displacement](#) that net two or more housing units, do not demolish existing rent-controlled units, and meet tenant protection and relocation standards as recognized in the [Housing Crisis Act of 2019](#), by Board of Supervisors or voter approval of a City Charter amendment or by Board decision to include more project types if or when a non-charter change pathway is available. (Planning, Mayor/BOS; Short)
- b. Adopt one or more Housing Sustainability Districts in [Well-resourced Neighborhoods](#) outside of areas vulnerable to displacement that include tenant protections and relocation standards as recognized in [Housing Crisis Act of 2019](#), by January 31, 2024. (Planning, Mayor/BOS; Short)
- c. Establish a ministerial pathway for project applications that provide 20% affordable housing on site through mechanisms described in Policy 25 action (a) through (b), for RHNA Cycle 6 lower-income sites identified in the Housing Element Update 2022 Sites Inventory that have been reused from Cycles 4 and 5 as required by per California Government Code §65580(g). (Planning, Mayor/BOS; Short)
- d. Eliminate Commission hearings on any code-complying project in the [Well Resourced Neighborhoods](#) subject to the Housing Accountability Act until January 31, 2027. (Planning, Mayor/BOS; Short)

51 A governmental decision involving little or no personal judgment by the public official; it 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.mini

Policy 26: Streamline and simplify permit processes to provide more equitable access to the application process, improve certainty of outcomes, and ensure meeting State- and local-required timelines, especially for 100% affordable housing and shelter projects.

Objective 4.A Substantially expand the amount of permanently affordable housing for extremely low- to moderate-income households.

Objective 4.B Expand small and mid-rise multi-family housing production to serve our workforce, prioritizing middle-income households.

Implementing Program Areas: Accessible and Affordable Housing; Reduction of Constraints for Housing Development, Maintenance and Improvement

Actions

- a. Make shelters, temporary housing, or urgent housing measures uses (such as safe sleeping sites) principally permitted in all zoning districts. (Planning, Mayor/BOS; Short)
- b. Remove funding approval barriers between City-owned and leased conditions for shelters under the emergency ordinance or similar future actions. (HSH, Mayor/BOS; Short)
- c. Remove requirement for General Plan referrals for shelters, 100% affordable housing, and development agreement projects. (Planning, Mayor/BOS; Medium)
- d. Remove Planning Code Section 429 Public Art requirements for 100% affordable housing projects. (Planning, Mayor/BOS; Medium)
- e. Remove Article 12C of the San Francisco Health Code Non-potable Water Ordinance requirements for 100% affordable housing projects. (Planning, Mayor/BOS; Medium)
- f. Create an administrative process for 100% affordable rehabilitation projects to add accessory dwelling units. (Planning, Mayor/BOS; Medium)
- g. Expand the Impact Fee exemption to a broader range of permanently affordable housing projects including those with units affordable up to 120 percent of Area Median Income or projects that rely on philanthropic capital. (Planning, Mayor/BOS; Short)
- h. Reduce the minimum lot size to 1,200 square feet and minimum lot width to 20 feet for proposed projects that net at least one housing unit. (Planning, Mayor/BOS; Short)
- i. Remove Conditional Use Authorizations or other regulatory barriers for lot consolidation on housing applications that net two or more housing units, do not demolish existing rent-controlled units, and meet tenant protection and relocation standards as recognized in [Housing Crisis Act of 2019](#) to facilitate larger and more efficient housing projects. (Planning, Mayor/BOS; Short)
- j. Remove Conditional Use Authorization requirement for demolition of single-family or multi-unit buildings that are not tenant occupied and without history of tenant evictions, that net two or more housing units, do not demolish existing rent-controlled units, and meet tenant protection and relocation standards as recognized in [Housing Crisis Act of 2019](#). Continue to apply Conditional Use requirements to demolition of tenant occupied buildings. (Planning, Mayor/BOS; Short)

- k. Remove Conditional Use Authorizations outside of [Priority Equity Geographies](#) where required to achieve greater height or remove an existing use, and instead apply neighborhood notification procedures for proposed demolition of identified community-service uses, such as theaters, grocery stores, and laundromats, and support their economic survival through a replacement provision or participation in a [Community Benefit Use](#) program⁵⁶ as described Policy 37 (d). (Planning, OEWD, Mayor/BOS; Short)
- l. Revise HOME-SF program and entitlement process to apply to more sites and be easier to use by eliminating Commission hearings for program-compliant projects applications, expand applicability to RH1, RH2, and RH3 zoned areas, and broaden the modifications to be more aligned with the State program. Proposed projects should not demolish existing rent-controlled units and must meet tenant protection and relocation standards as recognized in [Housing Crisis Act of 2019](#). (Planning, Mayor/BOS; Short)
- m. Remove neighborhood notification requirements for projects outside of [Priority Equity Geographies](#) that are code complying, net at least one housing unit, and only expand the rear or side of an existing building and for all ministerial projects. (Planning, Mayor/BOS; Short)
- n. Codify commonly applied but unadopted policies, on such topics as roof decks, flats, or draft ground floor residential design guidelines, to increase certainty in decision-making at Planning Commission. (Planning, Mayor/BOS; Short)
- o. Study removing the planning code requirement on large development sites south of Harrison Street in the Central SoMa Special Use District that limits residential uses in proportion to office ones on sites larger than 40,000 square feet that entail new construction or an addition of 100,000 square feet or more. (Planning, Mayor/BOS; Short)
- p. Remove the inner court five-foot setback at each level requirement under Planning Code Section 140 to allow more efficient construction techniques and reduce the cost of housing construction. (Planning, Mayor/BOS; Medium)
- q. Study changes to legislation on wind speeds under Planning Code Section 148 to address hazardous storm wind speed levels rather than comfort criteria to reduce technical analysis and expedite housing application approvals or find alternative method to address wind concerns in downtown. (Planning, Mayor/BOS; Short)
- r. Modify requirement to collect impact fees upon issuance of a Certificate of Final Completion and Occupancy instead of issuance of building permit. (Planning, Mayor/BOS; Short)
- s. Study challenges in and support proposals for adaptive re-use of vacant and under-utilized commercial office buildings for potential housing, especially if building types work well for groups

⁵⁶ Geographically specific programs established through community-led process to identify a menu of uses that meet community needs to be incorporated into certain future project approvals, thereby reducing the time and community resources required to shape projects that meet their needs on individual project approval basis. Programs may be supported through the the Office of Small Business or other community services resources.

that would benefit from their proximity to transit, services, or institutions, such as seniors, teachers, or students. (Planning; Short)

Policy 27: Improve coordination, alignment, shared mission, and functionality of post-entitlement permit processes across agencies and jurisdictions to speed housing construction starts after approvals, especially for 100% affordable housing and development agreements.

Objective 4.A Substantially expand the amount of permanently affordable housing for extremely low- to moderate-income households.

Objective 4.B Expand small and mid-rise multi-family housing production to serve our workforce, prioritizing middle-income households.

Implementing Program Areas: Reduction of Constraints for Housing Development, Maintenance and Improvement

Actions

- a. Study the designation of a lead permitting agency or assigned project manager for priority projects or projects delivering over 20% affordable housing to facilitate interagency alignment from application start to certificate of occupancy and final certification. (Planning, DBI; Short)
- b. Establish objective design standards as part of Better Streets requirements for on- and offsite improvements that supplant existing subjective ones. (Planning, Mayor/BOS; Medium)
- c. Revise public right-of-way (ROW) policy, rules, and procedures across city agencies to facilitate the use of the public ROW for utility infrastructure that would currently be required to be installed on private property to maximize the construction of housing units and expedite post-entitlement approvals. (Planning, DPW; Short)
- d. Continue to strengthen coordination of interagency permitting review and approval processes for implementation of approved large master-planned or development agreement projects to accelerate construction timelines of infrastructure improvements. (Planning, Mayor/BOS; Short)
- e. Modify Article 12C of the San Francisco Health Code Non-Potable Water Ordinance to be required only for housing projects at or over 250,000 gross square feet with projects at or over 100,000 to provide water budget calculations. (Planning, Mayor/BOS; Short)
- f. Strengthen the interagency coordination to reduce or eliminate the requirements for the associated approvals for publicly funded affordable housing; examples of associated approvals include the PG&E requirements to accommodate Public Utilities Commission (PUC) low-cost electric service, or the multi-agency review of disability access to reduce per-unit construction costs. (Planning, PUC, Mayor/BOS; Short)
- g. Resolve common disputes between the PUC and PG&E, especially on affordable housing project applications, which result in unnecessary equipment, delays, and costly upgrades. (Planning, PUC, Mayor/BOS; Medium)
- h. Lower the requirement for a major encroachment permit to a minor encroachment permit for housing projects to lay utility lines through public land to meet streetlight requirements for PUC. (Planning, DPW, PUC, Mayor/BOS; Medium)

- i. Issue administrative bulletins on code and standards interpretations to support, create certainty of expectations, and reduce review time from the Mayor's Office of Disability for 100% affordable housing projects. (MOD, MOHCD; Medium)
- j. Streamline plan checks, response to revisions, and field inspection process to support and reduce review time from the Mayor's Office of Disability for 100% affordable housing projects. (MOD, MOHCD; Medium)

POLICY 28: Affirm compliance in State housing law, requirements, and intent by strengthening data collection, clarifying definitions, and further supporting implementation.

Objective 4.A Substantially expand the amount of permanently affordable housing for extremely low- to moderate-income households.

Objective 4.B Expand small and mid-rise multi-family housing production to serve our workforce, prioritizing middle-income households.

Implementing Program Areas: Reduction of Constraints for Housing Development, Maintenance and Improvement

Actions

- a. Eliminate or remove application of design guidelines that subjectively restrict the massing of housing to ensure compliance with the State's [Housing Accountability Act](#). (Planning, Mayor/BOS; Short)
- b. Ensure that local adopted rules and procedures that implement future state housing law support the State's legislative intent. (Planning, Mayor/BOS; Short)
- c. Whenever Planning Code amendments or revisions are proposed, advocate for simpler or an overall reduction of rules that affect housing approvals to reduce the specific or institutional knowledge needed by City staff, applicants, and members of the public to increase accessibility. (Planning, Mayor/BOS; Short)
- d. Revise current hearing procedures for Planning Code Sections 147 and 295 Height Restrictions on Structures Shadowing Property Under the Jurisdiction of the Recreation and Park Commission so that project approvals ensure meeting hearing requirements. (Planning; Short)
- e. Remove Commission hearings for program-compliant State Density Bonus projects that do not require additional entitlements. Request clarification from California Department of Housing and Community Development (HCD) on how State Density Bonus Program applies to form-based zoning districts to assure compliance. (Planning, Mayor/BOS; Short)
- f. Request that HCD and the State legislature to clarify and consolidate permit milestone and timeframe definitions that stem from past legislation to ensure data accuracy and compliance in the required Annual Progress Report. (Planning; Short)
- g. Advocate with HCD and the State legislature to interpret, clarify, and consolidate expectations for tenant protections based on recent legislation. (Planning; Short)
- h. Advocate for HCD to provide more immediate and standardized implementation support for State housing legislation so that it is directly operational for general planning staff reducing the need for highly specialized experts to reduce constraints on staffing. (Planning; Short)
- i. Advocate for AB 101, State legislation that requires Low-Barrier Navigation Centers by right, to cover other crisis interventions that house people that are not considered emergency shelter, for example safe sleeping sites. (HSH, Planning; Medium)

- j. To ensure accurate data collection and continued compliance with the Permit Streamlining Act, establish and document two critical markers of site and building permit applications progress: “complete application” and “approved application” in permit application processes. (Planning; Short)
- k. Establish more immediate and final CEQA exemption determination to facilitate that a project application is “complete” earlier in the application process to expedite permit processing. Revise data collection process and establish data dashboards on application process, approvals, and unit delivery to provide more accurate, up to date, and transparent information to the State, advocates, and communities and reduce staff time on reporting. Review current requirements and eliminate any out-of-date or redundant housing reporting requirements. (Planning; Short)
- l. Re-allocate staffing from housing applications that do not legalize or add housing units, other than repair projects for low-income residents, to support housing production and community-led strategies in [Priority Equity Geographies](#). (Planning; Medium)
- m. Continue to implement the Mayor Executive Directives to accelerate creating new housing and expand City department’s compliance with the directives (Mayor Breed’s Executive Directive 18-01 and Mayor Lee’s Executive Directive 17-02). (Planning; Medium)
- n. Study, reform, reduce, and/or eliminate CEQA topic processes (e.g., thresholds, screening criteria, technical studies) or notification processes, including those that aren’t required by CEQA statute or guidelines (e.g., wind and shadow in San Francisco). This includes updating bulletins, guidelines, standard operating procedures, and/or local codes that address topics such as air quality, geotechnical, hazardous materials, historic preservation, noise, vibration, transportation, shadow, and wind. (Planning; Medium)
- o. Codify local procedures that recognize that housing applications for shelter, temporary housing, or urgent housing measures uses (such as safe sleeping sites) do not meet the standard of a “project” under CEQA, to ensure compliance with AB 101. (Planning, Mayor/BOS; Short)
- p. Examine what would be necessary to change to allow the definition of a “project” under CEQA without a discretionary process, for example, project applications that only require building permits. (Planning; Medium)
- q. Develop a streamlined project-specific addenda process in lieu of the existing community plan exemption (CPE) process or further refine the CPE process to reduce permit application timelines. (Planning; Medium)
- r. Analyze interaction between different planning department teams to identify areas where internal application review processes could be reformed and simplified, for example by standardizing and codifying technical studies and best practices, to shorten the time to get to a stable project description. (Planning; Medium)

POLICY 29: Complete community-led processes in Priority Equity Geographies that provide defined community benefits or mitigations for effects of new development consistent with state and federal law in order to reduce burdens on advocates of vulnerable populations and community members and establish more predictable outcomes for housing applications.

Objective 2.C	Increase accountability to American Indian, Black, and other communities of color.
Objective 3.C	Eliminate community displacement within areas vulnerable to displacement.
Objective 4.A	Substantially expand the amount of permanently affordable housing for extremely low- to moderate-income households.
Objective 4.B	Expand small and mid-rise multi-family housing production to serve our workforce, prioritizing middle-income households.

Implementing Program Areas: Empowerment of Equity Priority Communities; Reduction of Constraints for Housing Development, Maintenance and Improvement

Actions

- a. In [Priority Equity Geographies](#) where community-informed community benefits are provided, streamline approval processes including reducing notification requirements, consolidating appeal hearings, or providing ministerial pathways, for projects that provide increased on-site affordability, to facilitate certainty in the development process and comprehensively address all community concerns. (Planning, Mayor/BOS; Short)
- b. Support ministerial approval processes for mid-rise and small multi-family buildings that include community benefits such as units serving middle-income households without deed restriction, designating commercial space as a [Community Benefit Use](#), as defined in Policy 37, action (d), offering reduced rent for community-serving purposes via a development agreement or deed-restrictions, or meeting family-friendly criteria as referenced in Policy 33, action (d). (Planning, Mayor/BOS; Medium)
- c. Support ministerial approval processes for projects that include higher rates of below market rate units beyond required as informed by racial and social equity impact analysis under Policy 21, actions (a) and (b). (Planning, Mayor/BOS; Medium)
- d. Direct Department staff and resources to review Discretionary Review applications that are filed within [Priority Equity Geographies](#) in a timely manner and reallocate the Planning Department's staff resources from other Discretionary Review applications to support low-income homeowners with technical assistance as identified under Policy 30, action (c), using the Department's Racial and Social Equity Assessment tool. (Planning; Medium)

POLICY 30: Support the reduction of non-governmental challenges that enable affordable housing and small and mid-rise multi-family buildings as a prominent housing type.

Objective 4.A Substantially expand the amount of permanently affordable housing for extremely low- to moderate-income households.

Objective 4.B Expand small and mid-rise multi-family housing production to serve our workforce, prioritizing middle-income households.

Implementing Program Areas: Accessible and Affordable Housing; Reduction of Constraints for Housing Development, Maintenance and Improvement

Actions

- a. Reduce building code or jurisdictional conflicts to enable cost-efficient construction types and materials such as cross laminated timber⁵⁷, cassette⁵⁸, or modular⁵⁹ construction, especially where local jobs are supported. (DBI, Medium)
- b. Create low-interest construction loan programs for eligible lower-income homeowners to expand their existing homes with additional units or demolish and replace their homes with more units up the allowable maximum density. (MOHCD, Medium)
- c. Create and sustainably fund financing, technical assistance, outreach, and educational programs, such as the Housing Development Incentive Program for Homeowners, for eligible homeowners interested in updating their property from single- to multi-family housing, particularly assisting low-income property owners, households of color, seniors, and people with disabilities. Such programs should ensure accessible accommodations for aging adults and people with disabilities. (Planning, HSA; Short)
- d. Explore new fees on housing applications that propose large new or large expansions to single-family homes where no new units are added to create a funding stream for down-payment assistance or construction loans for low-income homeowners as described in Policy 30 (c). (Planning, Mayor/BOS; Medium)
- e. Expand the construction workforce through training programs in partnership with non-City apprenticeship programs and expand the Local Hire program to allow more projects to participate. (OEWD; Medium)
- f. Work with design professionals to produce replicable building details (such as bathroom layouts) that are code compliant and meet accessibility standards on publicly subsidized 100% affordable

⁵⁷ An engineered wood building material that can be used in walls, roofs, or ceilings, typically uses sustainable materials, and could lower construction cost through decreased lead times.

⁵⁸ A type of prefabricated housing where components or types of building parts but not full building units are manufactured in a factory setting, then assembled on site.

⁵⁹ A type of prefabricated housing where full units or substantial parts of a building are manufactured, shipped to a construction site, and then assembled into a full building. This evolving housing production method can reduce construction costs and increase durability.

housing projects. This will reduce plan review time, field corrections, and cost, while maintaining high-quality standards. (MOHCD, MOD; Medium)

- g. Expanded use of third-party consulting peer review of construction documents on publicly subsidized 100% affordable housing projects. (MOHCD, MOD; Medium)
- h. Implement innovations in project financing, including options for payment and performance bonds, retention, and other contract terms, expedited payments to contractors on publicly subsidized 100% affordable housing projects. (MOHCD, MOD; Medium)
- i. Support expansion of nonprofit project management capacity, especially focused on areas of the city that haven't seen much affordable housing development. (MOHCD; Medium)
- j. Support new systems of property management and asset management for efficiencies and low cost/per unit for expanded portfolios that include mid and smaller size buildings. (MOHCD; Medium)

POLICY 31: Facilitate small and mid-rise multi-family buildings that private development can deliver to serve middle-income households without deed restriction, including through adding units in lower density areas or by adding [Accessory Dwelling Units](#) (ADUs).

- Objective 3.B

Create a sense of belonging for all communities of color within Well-resourced neighborhoods through expanded housing choice.
- Objective 4.B

Expand small and mid-rise multi-family housing production to serve our workforce, prioritizing middle-income households.

Implementing Program Areas: Accessible and Affordable Housing; Reduction of Constraints for Housing Development, Maintenance and Improvement

Actions

- a. Allow a minimum of four units on all residential lots with a minimum of six on corner lots, expanding on the State duplex/lot split program ([SB 9](#)), and include programs and incentives that target these new homes to moderate- and middle-income households as described in Policy 26. (Planning, Mayor/BOS; Short)
- b. Revise and codify SB 9 program implementation with Department of Building Inspection to ensure that both flag-shaped lots and utility easements for lot splits are accepted. (DBI; Planning, Short)
- c. Prioritize City permitting staff resources for the review of [ADUs](#) that do not displace tenants. (DBI; Planning, Short)
- d. Continue to strengthen the interagency coordination (e.g. Roundtable Review) for permit processing of [ADUs](#) and implement an integrated online permitting system and permitting governance structure to support permit streamlining and government transparency. (Planning, DBI; ongoing)
- e. Create an affordable [ADU](#) program that provides financial support for professional services and construction of units that serve low-income households. (Planning, MOHCD; Short)
- f. Encourage [Junior ADUs \(JADUs\)](#) as an effective and low-cost way of adding habitable space within existing single-family homes, as JADUs also expand opportunities for multi-generational living. (Planning; Short)
- g. Revise ADU rent control provisions under local program to start ten years after issuance of Certificate of Occupancy to support homeowners adding units in existing single- and two-family housing. (Planning; Short)

POLICY 32: Promote and facilitate aging in place for seniors and multi-generational living that supports extended families and communal households.

Objective 4.C Diversify housing types for all cultures, family structures, and abilities.

Implementing Program Areas: Accessible and Affordable Housing; Existing Housing Preservation and Affordability; Facilitation of Diverse Housing Types; Reduction of Constraints for Housing Development, Maintenance and Improvement; Vulnerable Groups

Actions

- a. Increase permanently affordable senior housing along transit corridors to improve mobility of aging adults and seniors, particularly for extremely- and very-low income households including through expansion of Senior Operating Subsidies as referenced in Policy 5, action (j). (MOHCD; Long)
- b. Pursue multi-generational living for extended families and communal households that have space and amenities for children, working-age adults, seniors and persons with disabilities, when building permanently affordable senior housing referenced under Policy 27, action (a) above, or cooperative housing referenced in Policy 23, action (a). (MOHCD; Long)
- c. Create or support financing programs that support aging in place, including improvements to accessibility through home modifications or building ADUs, and supported by technical assistance programs referenced in Policy 26, action (c). (Planning, HSA, MOHCD; Short)
- d. Implement new strategies to support and prevent the loss of residential care facilities, using the recommendations of the Assisted Living Working Group of the Long-term Care Coordinating Council,⁶¹ including business support services, as well as City-funded subsidies for affordable placement of low-income residents (DPH, HSA; Medium)
- e. Support and explore expanding the Home Match Program to match seniors with people looking for housing that can provide home chore support in exchange for affordable rent. (HSA, MOHCD; Medium)
- f. Permit uses and eliminate regulatory limitations, such as conditional use authorizations, that discourage innovative, smaller housing types where licensing is not required, such as co-housing⁶² with amenities that support seniors and those with disabilities. (Planning; Medium)
- g. Strengthen interagency coordination to identify and implement strategies to address the housing needs of seniors and people with disabilities, informed by the Housing Needs Assessments referenced in Policy 6, action (f). (HSA, Planning, MOHCD, MOD; Short)
- h. Revise San Francisco definition of “family” to meet State requirements. (Planning; Short)

61 [Supporting Affordable Assisted Living in San Francisco, January 2019, Assisted Living Facility \(ALF\) Workgroup | San Francisco Human Services Agency \(sfhsa.org\)](#)

62 Co-housing, group housing, or co-living rooms are a type of housing that may have limited cooking facilities and do not contain a full kitchen in each room. Co-housing may include (but is not limited to) communes, fraternities and sororities, or Residential Hotels.

POLICY 33: Prevent the outmigration of families with children and support the needs of families to grow.

Objective 4.C Diversify housing types for all cultures, family structures, and abilities.

Implementing Program Areas: Accessible and Affordable Housing; Facilitation of Diverse Housing Types; Homeless Prevention and Elimination; Infrastructure and Community Services; Vulnerable Groups

Actions

- a. Identify neighborhoods with a higher concentration of low-income, immigrant, and rent- burdened⁶³ families with children, such as Tenderloin, Mission, Chinatown, and/or SoMA, and allocate resources to increase permanently affordable housing that addresses their income and needs in those neighborhoods. (MOHCD, Planning; Medium)
- b. Establish programs to assist extremely low and very low-income families with children to relocate from SROs and overcrowding living conditions to appropriate permanently affordable housing. (MOHCD, Planning; Medium)
- c. Develop objective design standards for child-friendly amenities within new buildings particularly for small and mid-rise multi-family buildings. (Planning; Short)
- d. Establish criteria for family-friendly housing to support these projects through processes referenced in Policy 25, action (b). Such criteria can include development projects with substantially higher number of two- or three-bedroom units than required; that are affordable to a wide range of low- to middle-income households and meet the child-friendly design standards established in Policy 28, action (b). (Planning; Medium)
- e. Collaborate with the San Francisco Unified School District to evaluate the feasibility of providing a priority in the school assignment process for low-income families and those living in permanently affordable housing. (Planning, SFUSD, MOHCD; Medium)
- f. Continue to require multi-bedroom unit mixes. (Planning; ongoing)

63 Households that pay more than 30 percent of their income for housing.

POLICY 34: Encourage co-housing⁶⁴ to support ways for households to share space, resources, and responsibilities, especially to reinforce supportive relationships within and across communities and generations.

Objective 4.C Diversify housing types for all cultures, family structures, and abilities.

Implementing Program Areas: Accessible and Affordable Housing; Facilitation of Diverse Housing Types; Reduction of Constraints for Housing Development, Maintenance and Improvement

Actions

- a. Eliminate the definition of “group housing” and modify “dwelling unit” to include “more than one” family in the Planning Code and to include minimum quality of life standards, such as cooking facilities and common space. (Planning, Mayor/BOS; Short)
- b. Support process and code changes in [Priority Equity Geographies](#) that seek to define specific needs or limits around co-housing types, as informed by Policy 18. (Planning, Mayor/BOS; Short)
- c. Create a co-housing informational program that provides ideas and recommendations on types, financing structures, precedents, and technical guidance to support their creation in [Cultural Districts](#) and [Priority Equity Geographies](#) to meet community needs. (Planning; Short)
- d. Support co-housing developments on parcels owned by non-profits, like sites owned by religious institutions, to further encourage philanthropically financed affordable housing. (Planning; Short)

⁶⁴ Co-housing, group housing, or co-living rooms are a type of housing that may have limited cooking facilities and do not contain a full kitchen in each room. Co-housing may include (but is not limited to) communes, fraternities and sororities, or Residential Hotels.

POLICY 35: Require new commercial developments and large employers, hospitals, and educational institutions to help meet housing demand generated by anticipated job growth to maintain an appropriate jobs-housing fit, and address housing needs of students.

Objective 4.C Diversify housing types for all cultures, family structures, and abilities.

Implementing Program Areas: Access to Housing; Accessible and Affordable Housing; Facilitation of Diverse Housing Types; Vulnerable Groups

Actions

- a. Conduct a feasibility study to assess large employers affordable housing funding on an ongoing-basis to complement the jobs housing linkage requirements. (Planning, OEWD, Mayor/BOS; Medium)
- b. Encourage and provide opportunities for large commercial developments to build housing or dedicate land in lieu of their jobs housing linkage fee with affordability requirements that align with the income levels of the households anticipated to fill new jobs. (Planning, OEWD, Mayor/BOS; Medium)
- c. Provide paths for large employers to contribute funding to and/or partner with non-profit developers to provide homeownership opportunities. (Planning; Medium)
- d. Maintain the jobs housing linkage program and adjust the fee levels based on an updated nexus study and feasibility study on a regular basis. (Planning; Long)
- e. Explore expanding jobs housing linkage fees to large employer institutional developments (medical and educational) who are currently not subject to jobs housing linkage fees. (Planning, OEWD, Mayor/BOS; Medium)
- f. Pursue partnerships that commit large employer institutions who are not subject to job housing linkage fees (hospitals and educational institutions) to conduct an analysis of the housing demand of their employees and to meet that demand within institutional master plans or equivalent documents. (Planning, OEWD, Mayor/BOS; Medium)
- g. Pursue partnerships with educational institutions to identify the housing needs of students, monitor implementation of planned student housing in institutional master plans, and promote strategies to address the unmet housing needs of students. (Planning; Medium)

POLICY 36: Maximize the use of existing housing stock for residential use by discouraging vacancy, short-term use, and speculative resale.

Objective Objective 4.C Diversify housing types for all cultures, family structures, and abilities.

Implementing Program Areas: Existing Housing Preservation and Affordability

Actions

- a. Explore legislating a vacancy tax for residential units that stay empty for long periods of a year or used as secondary or vacation homes. (Planning, Mayor/BOS; Medium)
- b. Explore regulatory paths, including a tax or other regulatory structures, for short term speculative resale of residential units, particularly those which seek to extract value out of evicting tenants, or rapid reselling to more lucrative markets. (Planning; Medium)
- c. Continue to improve compliance, enforcement, and restrictions on [short-term rentals](#). (Planning; ongoing)

POLICY 37: Facilitate neighborhoods where proximity to daily needs and high-quality community services and amenities promotes social connections, supports caregivers, reduces the need for private auto travel, and advances healthy activities.

Objective 5.A Connect people to jobs and their neighborhood with numerous, equitable, and healthy transportation and mobility options.

Objective 5.C Elevate expression of cultural identities through the design of active and engaging neighborhood buildings and spaces.

Implementing Program Areas: Cultural Stability; Infrastructure and Community Services

Actions

- a. Develop or adopt certification programs for community-serving businesses, such as grocery stores, childcare centers, healthcare clinics, and laundromats. Eliminate conditional use authorizations or reduce entitlement requirements related to lot size or commercial uses for new housing developments that include businesses that meet such requirements, allow them to participate in a [Community Benefit Use](#) program as described in Policy 32, action (d), or provide rental subsidies to them. (Planning, OEWD; Medium)
- b. In [Cultural Districts](#), reduce conditional use authorizations or other entitlement barriers for mixed-use buildings that can commit via deed restriction or other legal agreement to the inclusion of businesses, institutions, or services that support Cultural District needs and identity for a minimum of ten years. (Planning; Short)
- c. Incentivize new housing to commit via deed restrictions or other legal agreement to below market rate commercial leases for community-based organizations serving the neighborhood community for a minimum of ten years by providing fee waivers, especially in [Cultural Districts](#). (Planning; Medium)
- d. Study the creation of a [Community Benefit Use](#) program, referenced in Policy 25, action (b) and Policy 32, action (i), that allows new housing developments to have a highly flexible ground floor use entitlement and tenants to be eligible for rent subsidy in exchange for community participation in tenant selection or for businesses that obtain certifications as described in Policy 32, action (a). (Planning; Short)
- e. Strengthen interagency coordination, review, and compliance processes to ensure that walking and biking infrastructure and safety improvements are integrated into planning, funding, and construction and/or rehabilitation of public projects (e.g., parks and open spaces, libraries, and transit facilities) in addition to private development projects. (Planning, MTA, DPW; Short)
- f. Organize housing and neighborhood business and service areas to prioritize proximity in neighborhood planning or development agreement projects that propose land use changes. (Planning; Medium)
- g. Create and a long-range community facilities plan, and update every 5-10 years, for public facilities including parks, recreation centers, schools, libraries, to accommodate a thirty-year projected population growth, informed by equity metrics in a manner that secures equitable access in [Priority Equity Geographies](#), [Environmental Justice Communities](#), and [Well-resourced Neighborhoods](#) that

are targeted for increased housing capacity, building on processes such as the Community Facilities Framework, and in collaboration with Interagency Plan Implementation Committee. (Planning, SFRPD, LIB, SFUSD; Medium)

- h. Develop a comprehensive and regularly updated map of daily needs, amenities, and community facilities, to inform the work of the interagency coordination under action (e) as well as community-based organizations in planning for services, resources, open space, and businesses to be near each other and supportive to communities. (Planning, MTA, DPW, OEWD, DYCF, HSA; Medium)
- i. Expand and allow community serving uses, such as retail, restaurants, and personal services within areas that are primarily residential especially on corner parcels, especially uses under the [Community Benefit Use](#) program defined under Policy 32 action (d). (Planning; Short)
- j. Change regulations and definitions in current Planning code to improve flexibility on allowing home-based businesses and work from home in residential districts, for example, create an accessory entrepreneurial use that allows up to two employees. (Planning; Short)
- k. Continue to adhere to guidelines in the Better Streets Plan when new housing creates improvements to sidewalks, streets, and other public spaces. (Planning; ongoing)
- l. Encourage uses in the ground floor of buildings that support housing, neighborhood activity and identity, especially in [Cultural Districts](#), over inclusion of utility infrastructure, such as transformer vaults. (Planning, DPW; Short)

POLICY 38: Ensure transportation investments create equitable access to transit and are planned in parallel with increase in housing capacity to advance well-connected neighborhoods consistent with the City's [Connect SF vision](#), and encourage sustainable trips⁶⁵ in new housing.

Objective 5.A Connect people to jobs and their neighborhood with numerous, equitable, and healthy transportation and mobility options.

Objective 5.B Advance environmental justice, climate, and community resilience.

Implementing Program Areas: Infrastructure and Community Services

Actions

- a. Strengthen interagency coordination for transportation, evaluating the existing and future needs of [Priority Equity Geographies](#), [Environmental Justice Communities](#), and [Well-resourced Neighborhoods](#) targeted for increased housing capacity, and plan for staffing and funding needed for these investments (e.g., general obligation bonds, federal grants). This includes delivering a network such that transit vehicles come as frequently as every five minutes⁶⁶ along certain corridors, and for transit services consistent with the city's [Connect SF vision](#) and its [Transit Strategy](#) (SFMTA, Planning, SFCTA; Medium)
- b. Restore, maintain, and optimize the existing transit system, particularly through SFMTA's 5-year Capital Improvement Program's Transit Optimization and Expansion Projects in [Well-resourced Neighborhoods](#) targeted for increased housing capacity. (SFMTA, Planning; Short)
- c. Restore and improve transit service as identified in the city's [Transit Strategy](#), particularly for essential workers, transit-dependent people, and in [Priority Equity Geographies](#) and [Environmental Justice communities](#) (SFMTA; Short)
- d. Adopt requirements that encourage trips using priority modes⁶⁷ in new housing and reduce transportation impacts from new housing. Such amendments may require certain new housing to include additional transportation demand management measures and driveway and loading operations plans, protect pedestrian, cycling, and transit-oriented street frontages from driveways, and reduce vehicular parking. (Planning, SFMTA; Short)

65 Sustainable trips utilize priority modes include walking, bicycling, transit, and vanpooling that have a low-carbon impact.

66 A conceptual network of high-frequency transit lines, where a substantial investment in on-street improvements would markedly increase the routes' speed and reliability. These improvements include bus-only lanes, traffic signal adjustments, and queue jumps, and can be installed relatively quickly. Lines on the five-minute network include routes in the Rapid Network.

67 Priority modes include walking, bicycling, transit, and vanpooling.

POLICY 39: Support the repair and rehabilitation of housing to ensure life safety, health, and well-being of residents, especially in [Environmental Justice Communities](#), and to support sustainable building practices.

Objective 1.A Ensure housing stability and healthy homes

Objective 5.B Advance environmental justice, climate, and community resilience.

Implementing Program Areas: Healthy, Sustainable and Resilient Housing

Actions

- a. Create and expand programs to improve indoor air quality for existing housing, particularly in [Environmental Justice Communities](#), such as applying the standards in Article 38 of SF Health Code to such housing. (Planning, DPH; Short)
- b. Create electric conversion policies and programs for existing housing that decrease the use of gas appliances in homes to support respiratory health in children, prioritizing Environmental Justice Communities. (DOE, Mayor/BOS; Short)
- c. Support and streamline permits for energy retrofit, heating, ventilation and air conditioning (HVAC), and weatherization upgrades. (DBI, Planning; Short)
- d. Expand funding for acquisition and rehabilitation programs to remove mold, lead, and other health hazards through programs such as Fix Lead SF and CALHome. (Mayor/BOS; Medium)
- e. Continue to connect residents and housing developments with technical support and financing programs for earthquake safety retrofits such as the Mandatory Soft Story Retrofit Program. (DBI, ORCP; ongoing)
- f. Create programs to provide rehabilitation assistance to qualified homeowners to maintain exterior cladding, rooves, and essential building utilities in housing in [Environmental Justice Communities](#). (DBI; Medium)

POLICY 40: Enforce and improve planning processes and building regulations to ensure a healthy environment for new housing developments, especially in [Environmental Justice Communities](#).

Objective 1.A Ensure housing stability and healthy homes

Objective 5.B Advance environmental justice, climate, and community resilience.

Implementing Program Areas: Empowerment of Equity Priority Communities; Healthy, Sustainable and Resilient Housing; Infrastructure and Community Services

Actions

- a. Identify the public health needs of neighborhoods through community planning processes or large-scale development projects by engaging community-based organizations; public health needs include addressing air, soil, groundwater contamination, and noise pollution ([Planning](#), [DPH](#), [PUC](#), [ORCP](#), [PORT](#); Medium)
- b. Ensure and reinforce that all community planning efforts meet the City's [2021 Climate Action Plan](#), and future updates to this plan, to prepare neighborhoods and future housing projects for sea level rise impacts, especially in [Priority Equity Geographies](#) and [Environmental Justice Communities](#). ([Planning](#); Short)
- c. Provide neighborhood and infrastructure planning to mitigate flooding risk during weather events or due to climate crisis impacts. ([Planning](#), [SFPUC](#); Medium)
- d. Enhance high-pressure fire protection for the Westside of San Francisco by implementing and constructing Phase 1 of the Westside Potable Emergency Firefighting Water System (PEFWS) and continue to work with the community and obtain funding to implement and construct Phase 2 of the PEFWS. ([SFPUC](#), [Mayor/BOS](#); Medium)
- e. Develop and require community accountability measures, including notification and engagement of residents, when building housing on environmentally contaminated sites located in [Environmental Justice Communities](#) and [Priority Equity Geographies](#). ([Planning](#); Short)
- f. Develop notification processes in planning efforts in geographies that include polluting sources, such as freeways, to anticipate solutions for potential future sensitive populations such as seniors, children, and those with disabilities. ([Planning](#); Short)
- g. Strengthen building standards to ensure that new housing developments limit sound intrusion from exterior and interior sources. ([DBI](#), [Planning](#); Short)
- h. Explore whether certification or building codes effectively incentivize the use of low VOC (volatile organic compounds) materials in new construction to reduce exposure. ([DBI](#), [Planning](#); Short)
- i. Maximize the installation of site-appropriate, native trees and vegetation at grade and on roofs in new residential development, especially in neighborhoods with less tree canopy coverage as per the [SF Better Streets Plan](#), the [SF Green Landscaping Ordinance](#), and the [SF Better Roofs Ordinance](#). ([Planning](#), [DPW](#); Short)

- j. Update Planning Code requirements, such as the [SF Green Landscaping Ordinance](#), to reduce paved surfaces and underground enclosed space in rear and side yards to specifically retain deep soil for trees and more sustainable vegetation. (Planning; Short)
- k. Study and document the impact of open space and housing based on scientific analysis for people's health, especially for children, for the Commission's use in evaluating development agreements that include housing and rear yard variances in housing applications (Planning, DPH, RPD; Short)
- l. Enforce compliance with existing requirements in the [SF Stormwater Management Ordinance](#) to incorporate on-site stormwater management and flood resilience. (SFPUC, Planning; ongoing)
- m. With passage of more opportunities for ministerial approvals in Policy 25, redirect Planning Department environmental planning staff time towards long-range efforts that reduce the city's regional and global contributions to the climate crisis over site-by-site impacts to immediate area or temporary conditions, except in [Priority Equity Geographies](#) or other areas identified as [Environmental Justice Communities](#). (Planning; Medium)
- n. Study ways, such as through capital planning, to mitigate environmental conditions, such as wind, especially in [Priority Equity Geographies](#), that are changeable due to the climate crisis, impacted by many sites providing important city contributions (such as housing units), and not pragmatically solvable on a site-by-site basis. (Planning; Medium)

POLICY 41: Shape urban design policy, standards, and guidelines to enable cultural and identity expression, advance architectural creativity and durability, and foster neighborhood belonging.

Objective 5.C Elevate expression of cultural identities through the design of active and engaging neighborhood spaces and buildings.

Implementing Program Areas: Cultural Stability; Reduction of Constraints for Housing Development, Maintenance and Improvement

Actions

- a. Develop Objective Design Standards that reduce subjective design review of housing projects while ensuring that new development in existing neighborhoods support livability, building durability, access to light and outdoor space, and creative expression. (Planning; Short)
- b. Create and adopt a new objective design standard to require the use of natural and durable materials for front façade and windows, for example stucco, stone, concrete, wood, and metal, subject to periodic, amended revision and eliminate existing design guidelines, except in Special Area Design Guidelines or adopted or listed Historic Districts, that require detailed front façade compatibility with surrounding neighborhood architectural patterns, for example window proportions, roof shape, or type of entry. (Planning; Short)
- c. Complete, adopt, and apply the Ground Floor Residential Design Guidelines to housing projects, in coordination with State requirements. These recommend porches, stoops, and accessible open space near sidewalks to invite social engagement and belonging. (Planning; Medium)
- d. Create Special Area Design Guidelines if requested by communities in [Cultural Districts](#) and [Priority Equity Geographies](#) where the design of public space and architecture could help reinforce cultural identities, and in coordination with State requirements. (Planning; Medium)
- e. Replace terminology of “neighborhood character” and “neighborhood compatibility” in the Urban Design Element with terms that more directly support avoiding severe changes to building scale and/or architectural expression that dehumanize the experience of the built environment. Explore implications with Proposition M⁶⁸. (Planning; Short)
- f. Eliminate the use of “neighborhood character” and/or “neighborhood compatibility” terminology in case report findings towards approvals. (Planning; Short)
- g. Given health and safety requirements in the Building Code and rear yard requirements in the Planning Code, eliminate the use of “light” and “air” terminology in case report findings to support discretionary requests. (Planning; Short)

⁶⁸ Proposition M was adopted by the voters on November 4, 1986. It requires that the City shall find that proposed alterations and demolitions are consistent with eight priority policies set forth in Section 101.1 of the Planning Code. This includes a policy stating that existing housing and neighborhood character be conserved and protected in order to preserve the cultural and economic diversity of our neighborhoods.

POLICY 42: Support cultural uses, activities, and architecture that sustain San Francisco's diverse cultural heritage.

Objective 5.C Elevate expression of cultural identities through the design of active and engaging neighborhood buildings and spaces.

Implementing Program Areas: Cultural Stability; Healthy, Sustainable and Resilient Housing

Actions

- a. Utilize the [Cultural Districts](#) program to support building permanently affordable housing, along with other housing development and neighborhood investments that include cultural activities, uses, traditions, and spaces, in coordination with Policy 12. (Planning, MOHCD, OEWD, ARTS, DPW; Medium)
- b. Increase staff allocation within MOHCD, OEWD, DPW, ARTS, and Planning to create a more robust, sustained, and effective [Cultural Districts](#) program, provide more direct support for the development and implementation of their respective Cultural History Housing and Economic Sustainability Strategies (CHHESS). (MOHCD, Planning, OEWD, ARTS, DPW; Medium)
- c. Study creation of a cultural resource mitigation fund that could be paid into by projects that impact cultural resources to support cultural resource protection and preservation throughout the city, prioritizing funding the development of cultural spaces as described in Policy 12, action (f). (MOHCD/Planning/OEWD; Medium)
- d. Designate historically and culturally significant buildings, landscapes, and districts for preservation using the Citywide Cultural Resource Survey, Planning Code Articles 10 and 11, and state and national historic resource registries to ensure appropriate treatment of historic properties that are important to the community and unlock historic preservation incentives for more potential housing development sites. (Planning; Short)
- e. Promote the use of the [Retained Elements Special Topic Design Guidelines](#) to development applicants to address sites where conserving parts of buildings sustains cultural identity and proposed housing serves the community. (Planning; Short)
- f. Establish priority building permit and entitlement Planning Department review processes for multi-family residential development projects that rehabilitate or adaptively reuse existing buildings to support sustainable building practices, per Policy 34, while preserving cultural resources. (Planning; Short)
- g. Develop objective design standards for the treatment of historic buildings and districts to provide consistent and efficient regulatory review that facilitates housing development approvals and protects the City's cultural and architectural heritages. (Planning; Short)
- h. Promote historic preservation and cultural heritage incentives, such as tax credit programs and the State Historical Building Code, for use in residential rehabilitation projects through general outreach, interagency collaboration with MOHCD and OEWD, building trades collaboration, educational

materials, community capacity building efforts, and through the regulatory review process. (Planning, MOHCD, OEWD; Medium)

- i. Revise Urban Design Guidelines to provide guidance on including signage, lighting, public art, historical interpretation and educational opportunities in housing development projects in a manner that reflects neighborhood history and culture, prioritizing the acknowledgement and representation of American Indian history and culture, in coordination with State requirements. (Planning, ART; Short)
- j. Complete the Citywide Cultural Resources Survey, including the citywide historic context statement, with ongoing community engagement to identify important individual historic or cultural resources and districts. (Planning; Medium)
- k. Complete the Heritage Conservation Element of the General Plan in order to bring clarity and accountability to the City's role in sustaining both the tangible and intangible aspects of San Francisco's cultural heritage. (Planning; Ongoing)

Appendix A: Glossary

<i>Term</i>	<i>Definition</i>	<i>Link</i>
Accessory Dwelling Units (ADUs)	Housing units added to existing or proposed residential buildings. ADUs are also often called in-law units, granny flats, secondary units, or basement or garage apartments.	http://projects.sfplanning.org/community-stabilization/accessory-dwelling-units.htm
Administrative (or "ministerial") approval	A governmental decision involving little or no personal judgment by the public official; it 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.	
Affirmatively Further Fair Housing (AFFH)	Enacted by AB 686 in 2018, this California law strengthens existing fair housing requirements and protections. AFFH contains requirements state and local governments must follow to ensure inclusive communities, including new requirements for municipal housing element updates.	https://www.hcd.ca.gov/community-development/affh/index.shtml ; https://leginfo.ca.gov/faces/billTextClient.xhtml?bill_id=201720180AB686
Affordable Housing	Affordable housing is housing that is either rented or owned at prices affordable to households with low to moderate incomes. The United States Department of Housing and Urban Development (HUD) determines the thresholds by household size for these incomes for the San Francisco HUD Metro Fair Market Rent Area (HMFA). Permanently affordable housing means housing, regardless of ownership, for which there is a legally binding, recorded document in effect that limits the price at which the owner may sell or restricts the occupancy of the unit to a qualified, low-income household, in perpetuity.	https://sfplanning.org/sites/default/files/documents/reports/2021_Housing_Inventory.pdf https://www.lawinsider.com/dictionary/permanently-affordable-housing
All-Home Plan	All Home Plan recommends a proportion of 1-2-4 where for each four units of permanently supportive housing, two shelter beds and interim-housing options are added, along with homelessness prevention services for one individual.	210413 Regional Action Plan Final.pdf (allhomeca.org)
At-risk of becoming unhoused	People with prior experience of homelessness, with involvement with the criminal justice system, extremely-low and very-low income American Indian, Black, and Latinos/es/x, domestic violence victims, those at imminent risk of losing housing (for example with an eviction notice, or subject to landlord harassment).	
Certificate of Preference	In 1967, the Certificate of Preference Program ("the Certificate Program") was created to give housing preference to low- and moderate-income persons who were displaced by urban renewal programs in San Francisco. The certificates were offered to those displaced from the Western Addition and Hunters Point in the 1960s and 1970s.	https://sfmohcd.org/certificate-preference

Community Benefit Use Program	Geographically specific programs established through community-led process to identify a menu of uses that meet community needs to be incorporated into certain future project approvals, thereby reducing the time and community resources required to shape projects that meet their needs on individual project approval basis. Programs may be supported through the the Office of Small Business or other community services resources.	
Cooperative Housing	A housing cooperative, is a legal entity, usually a cooperative or a corporation, which owns real estate, consisting of one or more residential buildings. It operates under the cooperative legal framework that usually exists at the regional or national level.	https://www.housinginternational.coop/what-is-a-housing-cooperative/
Cost burdened	Households that pay more than 30 percent of their income for housing.	
Cross-laminated timber	An engineered wood building material that can be used in walls, roofs or ceilings, may be eco-friendly, and could lower construction cost through decreased lead times.	
Cultural anchors	Businesses, community and cultural centers, and other spaces of cultural importance for communities.	
Cultural Districts	A geographic area or location within San Francisco that embodies a unique cultural heritage. Through a formalized, collaborative partnership between the City and communities, the mandate requires that the City coordinate resources to assist in stabilizing vulnerable communities facing, or at risk of, displacement or gentrification.	http://projects.sfplanning.org/community-stabilization/cultural-districts-initiative.htm
Discriminatory programs	Discriminatory programs by government action affecting housing, including government sanctioned programs, include but are not limited to urban renewal, redlining, segregated public housing, racial covenants, and exclusionary zoning regulations, such as single-family zoning.	
Ellis Act Evictions	Evictions for which landlords have the right to evict tenants to remove all the units in the building from the rental market for at least 10 years. Units that have been recovered due to an Ellis Act eviction have restrictions on its future use, including conversions into condos and rentals.	https://projects.sfplanning.org/community-stabilization/rent-stabilization-eviction-protection.htm#:~:text=%28OMI%29,-Ellis%20Act,evictions,-landlords
Environmental Justice Communities Map	The draft Environmental Justice Communities Map (EJ Communities Map) describes areas of San Francisco that have higher pollution and are predominately low-income. This map is based on CalEnviroScreen, a tool created by CalEPA & OEHHA that maps California communities that are most affected by pollution and other health risks. This draft EJ Communities Map includes additional local data on pollution and demographics. The draft map received public feedback for refinement, through a community engagement process, and is expected to be finalized in Fall 2022, as part of the Environmental Justice Framework. Environmental Justice Communities (EJ Communities) are defined as the census tracts with the top 30% of cumulative environmental and socioeconomic vulnerability across the city.	

Exclusionary zoning practices	Land use regulations that through their design and effect perpetuate racial and social exclusion. Early zoning regulations including single-family zoning often institutionalized racially exclusive practices for real estate profits.	https://belonging.berkeley.edu/rootsraceplace#:~:text=Explicitly%20Racial,Exclusionary%20Zoning,-Many
Five-Minute Network (MUNI)	A conceptual network of high-frequency transit lines, where a substantial investment in on-street improvements would markedly increase the routes' speed and reliability. These improvements include bus-only lanes, traffic signal adjustments, and queue jumps, and can be installed relatively quickly. Lines on the five-minute network include routes in the Rapid Network.	https://connectsf.org/wp-content/uploads/ConnectSF_Transit_Strategy_FINAL-20211209-1.pdf (pg. 24)
Group housing, co-housing, or co-living	Co-housing, group housing, or co-living rooms are a type of housing that may have limited cooking facilities and do not contain a full kitchen in each room. Co-housing may include (but is not limited to) communes, fraternities and sororities, or Residential Hotels.	
High opportunity areas	Areas in every region of the state whose characteristics have been shown by research to support positive economic, educational, and health outcomes for low-income families—particularly long-term outcomes for children. SF Planning used this same index to identify "Well-resourced neighborhoods."	https://www.treasurer.ca.gov/ctcac/opportunity.asp
Housing accelerator fund	This fund offers affordable housing developers lending opportunities to bridge permanent financing programs offered by MOHCD for production and preservation of affordable housing. The speed of execution, flexible terms, and ability to coordinate with public funders helps borrowers acquire sites quickly. It also allowed investors to provide grants, equity-like investments, program-related investments (PRIs), and secured and unsecured debt for funding affordable housing.	https://www.sfhaf.org/
Housing Ladder strategy	A rehousing approach that offers opportunities for residents of Permanent Supportive Housing (PSH) to move from intensive supportive housing to more independent living, thus freeing up their PSH unit for others.	https://hsh.sfgov.org/services/the-homelessness-response-system/housing-ladder/
Inclusionary units	San Francisco requires new residential buildings of 10 or more units to include on-site affordable units (called inclusionary housing). Other options to meet this requirement include the payment of in-lieu fees (that fund 100 percent affordable housing), off-site affordable units, and land dedication.	http://projects.sfplanning.org/community-stabilization/inclusionary-housing.htm
Inventory of rental housing units	A registry of rent controlled units that could provide policy makers and advocacy organizations greater insight into occupancy status, rental rates, or eviction history.	http://projects.sfplanning.org/community-stabilization/rent-stabilization-eviction-protection.htm#C-3
Junior Accessory Dwelling Units (JADUs)	A type of ADU that is generally smaller than average ADUs and shares a restroom and/or kitchen with the main home.	https://projects.sfplanning.org/community-stabilization/accessory-dwelling-units.htm#:~:text=program%20for,junior%20ADUs%2C,that%20home...-However

Mid-rise multifamily buildings	Buildings of 5 to 8 stories	
Modular housing	A type of prefabricated housing, where the pieces of the building are usually built in one place using a factory assembly line, shipped to a construction site, and then assembled. Using this housing production method reduces construction costs through its building process and through decreased lead times.	
Navigation centers	Low-threshold, high-service temporary shelter programs for adults experiencing homelessness in San Francisco. Services include case management, housing navigation, DPH health services, HSA benefits enrollment, SSI advocacy, and harm reduction therapy.	https://hsh.sfgov.org/services/the-homelessness-response-system/shelter/navigation-centers/
No-fault evictions	Evictions that allow landlords to take possession of their property from the tenant and are not due to tenant actions. These evictions include Ellis Act, owner move-in, demolition, capital improvement, substantial rehabilitation, sale of unit converted to condo, and lead paint abatement.	https://projects.sfplanning.org/community-stabilization/rent-stabilization-eviction-protection.htm#:~:text=%27No-fault%27,evictions,-allow
Overcrowding	More than 1 person per room (including living rooms) for overcrowding, and more than 1.5 persons per room for severe overcrowding.	
Owner Move-In (OMI) Eviction	Evictions that allow owners to evict the tenant for the owner or their family to live in the unit as their principal place of residence. It is generally restricted to one OMI eviction per building.	https://projects.sfplanning.org/community-stabilization/rent-stabilization-eviction-protection.htm#:~:text=years,-.Owner,evictions,-allow
Payments of relocation assistance	Payments that landlords must provide tenants that are evicted through no-fault evictions. At the time of publication (Jan 2022) payments are set between \$7,200 to \$12,000 per tenant.	https://sfrb.org/sites/default/files/Document/Form/579%20Multilingual%20Relocation%20Payments%2037.9C%2020-21.pdf
Preference programs	Lottery preference programs provide priority for specific housing projects or affordable housing to households qualifying for each program. Having lottery preference improves a household's chances in a housing lottery for affordable housing and gives current and former San Francisco residents a chance to continue living in the City.	https://sfmohcd.org/lottery-preference-programs
Proposition 13	A 1978 ballot measure that reduced property tax rates on homes, businesses and farms, and capped assessed property taxes at 1% for assessed values with no more than 2% annual increase. Prop 13 significantly reduced the tax revenue of local jurisdictions to fund schools, services, and infrastructure.	
Racial and social equity assessment tool	An analysis approach to assessing the potential racial and social equity impacts of a proposed action. This tool is part of San Francisco Planning's Racial and Social Equity Action Plan, which aims to pro-actively advance equity in the Department's internal and external work such as community planning, community engagement, policy/laws development, hiring, and process improvements. At the time of publication (March 2022), this tool is still being developed.	https://sfplanning.org/project/racial-and-social-equity-action-plan#about

Racially restrictive covenants	Throughout the late-nineteenth and mid-twentieth centuries, white property owners and subdivision developers wrote clauses into their property deeds forbidding the resale and sometimes rental of such property to non-whites, particularly African Americans. This approach was endorsed by the federal government and the real estate industry at least through the 1940s, and in many cases was required by banks and other lending institutions.	https://belonging.berkeley.edu/rootsraceplace#:~:text=138-.Racially%20Restrictive,Association%20Bylaws,-Throughout
Rapid Network (MUNI)	<p>The 13 rail and bus lines that account for the majority of Muni's ridership. Before the pandemic, Rapid Network lines were scheduled to operate every 10 minutes or better all day on weekdays.</p> <p>The lines in the Rapid network consist of J Church; KT: K Ingleside; T Third Street; M Ocean View; N Judah; 5 Fulton; 5R Fulton Rapid; 7 Haight/Noriega; 9 San Bruno; 9R San Bruno Rapid; 14 Mission; 14R Mission Rapid; 28 19th Avenue; 28R 19th Avenue Rapid; 38 Geary; and 38R Geary Rapid.</p>	https://connectsf.org/wp-content/uploads/ConnectSF_Transit_Strategy_FINAL-20211209-1.pdf (pg. 24)
Rapid rehousing	A set of interventions that provides people with grants to pay for living expenses like first and last month's rent managed by the SF Department of Homelessness and Supportive Housing.	https://hsh.sfgov.org/services/the-homelessness-response-system/housing/
Redlining	An explicitly discriminatory federal policy that color-coded Black and nearby neighborhoods in red, deeming them "hazardous" to potential mortgage lenders. This systematically denied residents in these neighborhoods loans for homeownership or maintenance, leading to segregation and cycles of disinvestment in primarily Black and other communities of color.	https://www.urbandisplacement.org/about/what-are-gentrification-and-displacement/
Rent control	Rent Ordinance (1979) that restricts annual rent increases, ensures tenants can only be evicted for "just causes," and restricts evictions of tenants occupying a qualifying unit built prior to June 13, 1979. Once tenants vacate the rent-stabilized unit, landlords can raise its rent to market rate (otherwise known as vacancy decontrol).	http://projects.sfplanning.org/community-stabilization/rent-stabilization-eviction-protection.htm
Severely cost burdened	Households that pay more than 50 percent of their income for housing.	
Short-term rentals	A rental of all or a portion of a home for periods of less than 30 nights (for example, Airbnb rentals).	http://projects.sfplanning.org/community-stabilization/short-term-rental-regulations.htm
Single Room Occupancy	A form of housing that serves low-income residents. A typical room in an SRO residential hotel is a single eight (8) x ten (10) foot room with shared toilets, kitchens and showers on each floor.	http://projects.sfplanning.org/community-stabilization/sro-hotel-protections.htm
Small multifamily building	Buildings of 4 or less stories that include between 4 and 19 units	
Small Sites Acquisition	An acquisition and rehabilitation loan program for small multifamily rental buildings to protect and establish long-term affordable housing throughout San Francisco, launched in 2014.	http://projects.sfplanning.org/community-stabilization/small-sites-program.htm

Social Housing	Social housing does not have a locally or nationally agreed upon definition, but it can generally be understood as below market rate housing owned and run by a government or nonprofit agency. It can include rental or shared ownership models. Social housing can provide homes for people of all income levels and may be associated with participatory housing models that facilitate resident-led decision-making.	
Supportive housing	A type of housing managed by the SF Department of Homelessness and Supportive Housing that offers tenants long-term affordable housing with on-site services, such as case management, mental health services, etc.	https://hsh.sfgov.org/services/the-homelessness-response-system/housing/
Trauma-informed systems	The TIS Initiative at the San Francisco Department of Public Health (SFDPH) is an organizational change model to support organizations to respond to and reduce the impact of trauma.	https://www.sfdph.org/dph/comupg/programs/TIS/default.asp
Urban renewal	A federally funded program that acquired, razed, and redeveloped areas of cities condemned as "blighted." In practice, redevelopment areas often followed redlining, and property was often taken from people of color by eminent domain for minimal compensation creating massive displacement of those communities.	https://belonging.berkeley.edu/rootsraaceplace#:~:text=The%20Beginnings,Suburban%20Revolt

ATTACHMENT 5

Analysis of Impacts of Accelerated Construction of Regional Housing Needs Allocation

ANALYSIS OF IMPACTS OF ACCELERATED CONSTRUCTION OF REGIONAL HOUSING NEEDS ALLOCATION

Introduction

Comments on the draft environmental impact report (EIR) express that the draft EIR should have studied the impacts of construction of 82,070 housing units (i.e., the Regional Housing Needs Allocation [RHNA] numbers) by 2031, instead of, or in addition to, construction of 150,000 housing units by 2050. The purpose of this attachment is to provide informational analysis to demonstrate that the draft EIR adequately addresses the potential environmental impacts from construction of 82,070 housing units by 2031. As explained below, such impacts would be substantially the same as impacts from construction of 150,000 units by 2050. Although certain impacts could occur sooner, or could be slightly greater due to the concentration of construction in a shorter time frame, those impacts would not be substantially different than the impacts identified in the draft EIR.

Overview

Consistent with state housing element law, the housing element update includes goals, policies, and actions, and subsequent implementation programs to make sites available to accommodate housing development for each income level allocated to San Francisco by the RHNA (i.e., 82,070 total housing units). For the purpose of the California Environmental Quality Act (CEQA), the draft EIR analyzes the impacts of housing development that is reasonably foreseeable between 2020 and 2050. This approach is supported by substantial evidence, as explained in RTC Response PD-2, Environmental Baseline, and it provides the public and decision makers the most accurate and understandable picture practically possible using the best information available. As explained in Response ALT-1, Range of Alternatives, the draft EIR studied a reasonable range of alternatives.

The analysis compares the indirect environmental impacts that would result from the proposed action, which includes the RHNA number, to the indirect environmental impacts that would result under an accelerated schedule of housing development that would “front load” a significant portion of the housing development to the near future, between 2023 and 2031. The analysis first discusses the overall environmental impacts, and then the timing of the environmental impacts.

Overall Environmental Impacts

Under the proposed action, based on department projections, the EIR analyzes the programmatic impacts of construction of approximately 150,000 housing units in the city by 2050 compared to 2020 conditions. This number (150,000) includes the city’s RHNA number (82,070). Construction of the 150,000-housing unit total would be a 182 percent increase over the 82,070 housing units allocated to the city as its RHNA for 2023 to 2031. Thus, the analysis in the draft EIR – which analyzes physical environmental impacts from more housing units over a longer timeframe (150,000 housing units over 30 years) - adequately addresses overall environmental impacts from fewer housing units over a shorter timeframe (82,070 housing units over eight years).

Timing of Environmental Impacts

CEQA requires a lead agency to consider the short-term and long-term effects of the project. As described above, the draft EIR adequately addresses overall effects from the proposed action at a programmatic level, including the construction of 75,000 housing units by 2035 and the construction of 150,000 housing units by 2050.¹ For informational purposes, the following substantiates how the draft EIR also adequately addresses the short-term and long-term effects of the construction of 82,070 housing units between 2023 and 2031.

Table 5-1 compares the indirect environmental impacts of the proposed action, assuming housing development growth projections:

- greater than RHNA number, but over a longer period: construction of 75,000 housing units between 2020 and 2035 and 150,000 housing units from 2020 to 2050²

to the intensity and timing of environmental impacts from:

- the accelerated construction of RHNA number: 82,070 housing units between 2023 and 2031.

In addition, in instances where the accelerated construction of RHNA number would have a significant impact, Table 5-1 identifies if:

- construction-related significant impacts would remain the same or could be greater than identified in the draft EIR; or
- operational-related significant impacts could occur earlier than that identified for the proposed action studied in the draft EIR.

The analysis contemplates that future construction of 82,070 housing units by 2031 would occur in locations similar to those under the proposed action, consistent with the proposed action's objectives. The analysis is conservative as a substantial portion of the 82,070 housing units would occur without the housing element update, and thus not all impacts of development of the RHNA number of units are the result of the proposed action.³

As shown in the table and the text following the table, in no instance would accelerated construction of the RHNA number of units result in a new significant impact or a substantial increase in the severity of a significant

¹ The estimates of the average number of housing units constructed per year in the draft EIR are just that, averages and estimates. They are based on substantial evidence as an analytical tool to contextualize the potential environmental impacts of the housing element update, but they are not intended to be an exact indication of the amount of constructed housing units in a particular year (refer to Draft EIR, appendix C). Some years may have more housing units constructed than estimated and some years may have fewer.

² Based on the draft EIR projections, this is approximately 48,000 additional housing units (rounded to 50,000 additional housing units) in the city between 2020 and 2050 over the number the number of units that would be built under the existing 2014 housing element, or an average of approximately 1,600 additional housing units per year than the existing housing element (delta). As noted in Response PD-1, this delta is used for the baseline plus proposed action impact analysis, while the cumulative impact analysis considers the impacts that would result from 150,000 additional housing units from 2020 to 2050, among other cumulative projects.

³ Based on the draft EIR projections, 82,070 housing units is approximately 54,870 additional housing units in the city between 2023 and 2031 over the number the number of units that would be built under the existing 2014 housing element, or an average of approximately 6,860 additional housing units per year than the existing housing element.

environmental impact identified in the draft EIR. Additional discussion of selected topics is provided following the table to further expand upon this analysis.

Conclusion

In sum, impacts from construction of 82,070 housing units by 2031 would be substantially the same as draft EIR's analysis of impacts from construction of 150,000 units by 2050. Although certain impacts could occur sooner or could be slightly greater due to the concentration of construction in a shorter time frame, those impacts would not be substantially different than the impacts identified in the draft EIR.

The analysis contained within this attachment does not constitute significant new information requiring recirculation of the EIR under CEQA Guidelines section 15088.5. There would be no new significant environmental impact and no substantial increase in the severity of an environmental impact. Further, no instances would occur where a new or modified mitigation measure or alternative would be required. Lastly, the draft EIR approach is supported by substantial evidence and provides the public meaningful opportunity to review and comment on the proposed action.

RTC Attachment Table 5-1: Comparison of Environmental Impacts of Construction of 150,000 Housing Units over Longer Timeline vs. Accelerated Timeline of Construction of 82,070 Housing Units

	Construction of 150,000 Housing Units Between 2020 and 2050 ¹	Construction of 82,070 Housing Units Between 2023 and 2031 ²
Land Use and Planning		
Physically Divide Existing Communities	Impact LU-1: The proposed action would not physically divide an established community. (LTS)	Similar. (LTS)
Conflict with Land Use Plans	Impact LU-2: The proposed action would not cause a significant physical environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. (LTS)	Similar. (LTS)
Cumulative Land Use	Impact C-LU-1: The proposed action, in combination with cumulative projects, would not result in a significant cumulative land use impact. (LTS)	Similar. (LTS)
Aesthetics		
Scenic Vista	Impact AE-1: The proposed action would not have a substantial adverse effect on a scenic vista. (LTS)	Similar. (LTS)
Damage Scenic Resources	Impact AE-2: The proposed action would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway. (LTS)	Similar. (LTS)
Conflict with Zoning and Scenic Quality Regulations	Impact AE-3: The proposed action would not conflict with applicable zoning and other regulations governing scenic quality. (LTS)	Similar. (LTS)
Light and Glare	Impact AE-4: The proposed action would not create a new source of substantial light or glare which would adversely affect daytime or nighttime views in the area. (LTS)	Similar. (LTS)
Cumulative Aesthetics	Impact C-AE-1: The proposed action, in combination with cumulative projects, would not result in a significant cumulative aesthetic impact. (LTS)	Similar. (LTS)

	Construction of 150,000 Housing Units Between 2020 and 2050 ¹	Construction of 82,070 Housing Units Between 2023 and 2031 ²
Population and Housing		
Population Growth	Impact PH-1: The proposed action would not induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure). (LTS)	Similar. (LTS)
Replacement Housing	Impact PH-2: The proposed action would not displace substantial numbers of existing people or housing units, necessitating the construction of replacement housing. (LTS)	Similar. (LTS)
Cumulative Population and Housing	Impact C-PH-1: The proposed action, in combination with cumulative projects, would not result in a significant cumulative impact from unplanned population growth or displacement. (LTS)	Similar. (LTS)
Cultural Resources		
Built-Environment Historic Resources	Impact CR-1: The proposed action would cause a substantial adverse change in the significance of a historical resource pursuant to section 15064.5. (SUM)	Similar. (SUM)
Archeological Resources	Impact CR-2: The proposed action has the potential to cause a substantial adverse change in the significance of an archeological resource pursuant to section 15064.5. (LTSM)	Similar. (LTSM)
Human Remains	Impact CR-3: The proposed action has the potential to disturb human remains, including those interred outside of formal cemeteries. (LTSM)	Similar. (LTSM)
Cumulative Built-Environment Historic Resources	Impact C-CR-1: The proposed action, in combination with cumulative projects, would result in a significant cumulative impact related to historical resources, as defined in CEQA Guidelines section 150.64.5. (SUM)	Similar. (SUM)
Cumulative Archeological Resources and Human Remains	Impact C-CR-2: The proposed action, in combination with cumulative projects, would result in a significant cumulative impact related to archeological resources and human remains. (LTSM)	Similar. (LTSM)

	Construction of 150,000 Housing Units Between 2020 and 2050 ¹	Construction of 82,070 Housing Units Between 2023 and 2031 ²
Tribal Cultural Resources		
Archeological Tribal Cultural Resources	Impact TCR-1: The proposed action would result in a substantial adverse change to an archeological tribal cultural resource. (LTSM)	Similar. (LTSM)
Non-Archeological Tribal Cultural Resources	Impact TCR-2: The proposed action would result in a substantial adverse change in the significance of a non-archeological tribal cultural resource. (LTSM)	Similar. (LTSM)
Cumulative Tribal Consultation Resources	Impact C-TCR-1: The proposed action, in combination with cumulative projects, would result in a significant cumulative impact on tribal cultural resources. (LTSM)	Similar. (LTSM)
Transportation and Circulation		
Construction-related potentially hazardous conditions, accessibility, or substantially delay public transit	Impact TR-1: The proposed action would require a substantially extended duration or intense activity due to construction and the secondary effects of that construction could create potentially hazardous conditions for people walking, bicycling, or driving, or public transit operations, or interfere with emergency access or accessibility for people walking or bicycling or substantially delay public transit. (SU)	Impact likely greater between 2023 and 2031, but not substantially more severe. ³ (SU)
Potentially Hazardous Conditions	Impact TR-2: The proposed action would not create potentially hazardous conditions for people walking, bicycling, or driving or public transit operations. (LTS)	Similar. (LTS)
Accessibility	Impact TR-3: The proposed action would not interfere with accessibility of people walking or bicycling to and from the project site, and adjoining areas, or result in inadequate emergency access. (LTS)	Similar. (LTS)
Public Transit Delay	Impact TR-4: The proposed action would substantially delay public transit. (SUM)	Impact could occur earlier, and would likely be similar to that in 2035 midpoint analysis. (SUM)
Vehicle Miles Traveled (VMT)/Induced Automobile Travel	Impact TR-5: The proposed action would not cause substantial additional VMT or substantially induce automobile travel. (LTS)	Similar. (LTS)

	Construction of 150,000 Housing Units Between 2020 and 2050 ¹	Construction of 82,070 Housing Units Between 2023 and 2031 ²
Loading	Impact TR-6: The proposed action could result in a loading deficit and the secondary effects could create potentially hazardous conditions for people walking, bicycling, or driving; or substantially delay public transit. (SUM)	Similar. (SUM)
Parking	Impact TR-7: The proposed action would not result in a parking deficit. (LTS)	Similar. (LTS)
Cumulative Construction-Related Transportation	Impact C-TR-1: The proposed action, in combination with cumulative projects, would result in significant construction-related transportation impacts, and the proposed action would contribute considerably to those impacts. (SU)	Impact likely greater between 2023 and 2031, but not substantially more severe. ³ (SU)
Cumulative Potentially Hazardous Conditions, Accessibility, VMT, and Parking	Impact C-TR-2: The proposed action, in combination with cumulative projects, would not create potentially hazardous conditions, would not interfere with accessibility; would not cause substantial additional VMT or substantially induce automobile travel; and would not result in significant parking impacts. (LTS)	Similar. (LTS)
Cumulative Public Transit Delay	Impact C-TR-3: The proposed action, in combination with cumulative projects, would substantially delay public transit, and the proposed action would contribute considerably to those impacts. (SUM)	Impact could occur earlier, and would likely be similar to that in 2035 midpoint analysis. (SUM)
Cumulative Loading	Impact C-TR-4: The proposed action, in combination with cumulative projects, could result in significant cumulative loading impacts, and the proposed action could contribute considerably to those impacts. (SUM)	Similar. (SUM)
Noise and Vibration		
Construction Noise	Impact NO-1: Construction of future development consistent with the proposed action would generate a substantial temporary or permanent increase in ambient noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. (SUM)	Impact likely greater between 2023 and 2031, but not substantially more severe. ³ (SUM)

	Construction of 150,000 Housing Units Between 2020 and 2050 ¹	Construction of 82,070 Housing Units Between 2023 and 2031 ²
Operational Noise	Impact NO-2: Operation of the proposed action would generate noise levels in excess of standards established in the local general plan or noise ordinance or applicable standards of other agencies. (SUM)	Impact could occur earlier, and would likely be similar to that in 2035 midpoint analysis. (SUM)
Construction Vibration	Impact NO-3: Construction of future development consistent with the proposed action would generate excessive groundborne vibration. (LTSM)	Similar. ³ (LTSM)
Cumulative Construction Noise	Impact C-NO-1: The proposed action, in combination with cumulative projects, would result in a significant cumulative construction noise impact. (SUM)	Impact likely greater between 2023 and 2031, but not substantially more severe. ³ (SUM)
Cumulative Operational Noise	Impact C-NO-2: The proposed action, in combination with cumulative projects, would not result in a significant cumulative operational noise impact. (LTS)	Impact could occur earlier, and would likely be similar to that in 2035 midpoint analysis. (LTS)
Air Quality		
Conflict with Clean Air Plan	Impact AQ-1: The proposed action would not conflict with or obstruct implementation of the applicable air quality plan. (LTS)	Similar. (LTS)
Criteria Air Pollutants – Proposed Action	Impact AQ-2: The proposed action would result in a cumulatively considerable net increase in criteria pollutants for which the project region is in nonattainment status under an applicable federal or state ambient air quality standard. (SUM)	Similar, including for 2035 midpoint analysis. (SUM)
Criteria Air Pollutants – Future Development (Construction)	Impact AQ-3: Construction of future development consistent with the proposed action would result in a cumulatively considerable net increase in non-attainment criteria pollutant emissions. (LTSM)	Similar. (LTSM)

	Construction of 150,000 Housing Units Between 2020 and 2050 ¹	Construction of 82,070 Housing Units Between 2023 and 2031 ²
Criteria Air Pollutants – Future Development (Operation)	Impact AQ-4: The proposed action would not result in a cumulatively considerable net increase in any non-attainment criteria pollutant during operations. (LTS)	Similar. (LTS)
PM _{2.5} and TACs	Impact AQ-5: The proposed action would expose sensitive receptors to substantial levels of fine particulate matter (PM _{2.5}) and toxic air contaminants. (SUM)	For construction, impact likely greater between 2023 and 2031, but not substantially more severe. ³ For operation, impact could occur earlier, and would likely be similar to that in 2035 midpoint analysis. (SUM)
Odors	Impact AQ-6: The proposed action would not result in other emissions (such as those leading to odors) that would adversely affect a substantial number of people. (LTS)	Similar. (LTS)
Cumulative PM _{2.5} and TACs	Impact C-AQ-1: The proposed action, in combination with cumulative projects, would expose sensitive receptors to substantial levels of fine particulate matter (PM _{2.5}) and toxic air contaminants under cumulative conditions. (SUM)	Impact likely greater between 2023 and 2031, but not substantially more severe. ³ (SUM)
Cumulative Odors	Impact C-AQ-2: The proposed action, in combination with cumulative projects, would not result in a significant cumulative odor impact. (LTS)	Similar. (LTS)
Greenhouse Gas Emissions		
Greenhouse Gas (GHG) Emissions	Impact GHG-1: The proposed action would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment. (LTS)	Similar. (LTS)
Conflict with GHG Plans	Impact GHG-2: The proposed action would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gases. (LTS)	Similar. (LTS)
Wind		
Wind in Outdoor Public Areas	Impact WI-1: The proposed action would create wind hazards in publicly accessible areas of substantial pedestrian use. (SUM)	Similar. (SUM)
Cumulative Wind in Outdoor Public Areas	Impact C-WI-1: The proposed action, in combination with cumulative projects, would not result in a significant cumulative wind impact. (LTS)	Similar. (LTS)

	Construction of 150,000 Housing Units Between 2020 and 2050 ¹	Construction of 82,070 Housing Units Between 2023 and 2031 ²
Shadow		
Publicly Accessible Open Space	Impact SH-1: The proposed action would create new shadow that would substantially and adversely affect the use and enjoyment of publicly accessible open spaces. (SUM)	Similar. (SUM)
Cumulative Publicly Accessible Open Space	Impact C-SH-1: The proposed action, in combination with cumulative projects, would not result in a significant cumulative shadow impact. (LTS)	Similar. (LTS)
Recreation		
Use of Facilities	Impact RE-1: The proposed action would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated. (LTS)	Similar. (LTS)
Construction of Recreational Facilities	Impact RE-2: The proposed action would not include recreational facilities but would require the construction or expansion of recreational facilities that would have an adverse physical effect on the environment. (LTSM)	Impact could occur earlier but would be similar. (LTSM)
Cumulative Recreation Impacts	Impact C-RE-1: The proposed action, in combination with cumulative projects, would not result in a significant cumulative impact on recreation. (LTS)	Similar. (LTS)
Utilities and Service Systems		
Water Supply	Impact UT-1: Sufficient water supplies would be available to serve projected growth in normal, dry, and multiple dry years without implementation of the Bay Delta Plan Amendment. If the Bay Delta Plan Amendment is implemented, the SFPUC would require rationing and could develop new or expanded water supply facilities to address shortfalls in single and multiple dry years. Environmental impacts related to new or expanded water supply facilities and increased rationing would result in significant and unavoidable environmental impacts. (SU)	Impact related to the water supply and associated facilities without implementation of the Bay Delta Plan amendment would be similar to that in 2035 midpoint analysis. (LTS) Impact related to the water supply and associated facilities in single dry and multiple dry years with implementation of the Bay Delta Plan amendment would likely occur earlier but the impact would be similar to that in 2035 midpoint analysis for the scenario with the Bay Delta Plan amendment. (SU)

	Construction of 150,000 Housing Units Between 2020 and 2050 ¹	Construction of 82,070 Housing Units Between 2023 and 2031 ²
Expansion of Wastewater Treatment or Stormwater Drainage Facilities	Impact UT-2: The proposed action would require or result in the relocation or construction of new or expanded wastewater treatment or stormwater drainage facilities, the construction or relocation of which could cause significant environmental effects. (SUM)	Impact related to the expansion of wastewater treatment facilities could occur earlier, but the impact would be similar. (SUM) Impact related to stormwater drainage facilities would be similar. (LTS)
Expansion of Electric Power or Telecommunication Facilities	Impact UT-3: The proposed action would require or result in the relocation or construction of new or expanded electric power or telecommunication facilities, the construction or relocation of which could cause significant environmental effects. (LTSM)	Similar. (LTSM)
Wastewater Treatment Capacity	Impact UT-4: The proposed action would result in a determination by the wastewater treatment provider that serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments. (SUM)	Impact related to wastewater treatment capacity could occur earlier but the impact would be similar. (SUM)
Solid Waste – Capacity	Impact UT-5: The proposed action would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair attainment of solid waste reduction goals. (LTS)	Similar. (LTS)
Solid Waste – Regulations	Impact UT-6: The proposed action would comply with federal, state, and local management and reduction statutes and regulations related to solid waste. (LTS)	Similar. (LTS)
Cumulative Wastewater and Stormwater	Impact C-UT-1: The proposed action, in combination with cumulative projects, would not result in a significant cumulative impact related to the wastewater and stormwater collection and treatment system. (LTS)	Similar. (LTS)
Cumulative Electric and Telecommunications	Impact C-UT-2: The proposed action, in combination with cumulative projects, would not result in a significant cumulative impact related to electric and telecommunication facilities. (LTS)	Similar. (LTS)
Cumulative Solid Waste	Impact C-UT-3: The proposed action, in combination with cumulative projects, would not result in a significant cumulative impact related to solid waste facilities and regulations. (LTS)	Similar. (LTS)

	Construction of 150,000 Housing Units Between 2020 and 2050 ¹	Construction of 82,070 Housing Units Between 2023 and 2031 ²
Public Services		
Fire Services	Impact PS-1: The proposed action would result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or a need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, to maintain acceptable service ratios, response times, or other performance objectives for fire protection and emergency medical services. (LTSM)	Impact could occur earlier, but the impact would be similar. (LTSM)
Police Services	Impact PS-2: The proposed action would result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, to maintain acceptable service ratios, response times, or other performance objectives for police protection. (LTSM)	Impact could occur earlier, but the impact would be similar. (LTSM)
Schools	Impact PS-3: The proposed action would result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, to maintain acceptable service ratios or other performance objectives for schools. (LTSM)	Impact could occur earlier, but the impact would be similar. (LTSM)
Libraries	Impact PS-4: The proposed action would result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, to maintain acceptable service ratios or other performance objectives for libraries. (LTSM)	Impact could occur earlier, but the impact would be similar. (LTSM)
Parks	Impact PS-5: The proposed action would not in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, to maintain acceptable service ratios, response times, or other performance objectives for parks. (LTSM)	Impact could occur earlier, but impact would be similar. (LTSM)

	Construction of 150,000 Housing Units Between 2020 and 2050 ¹	Construction of 82,070 Housing Units Between 2023 and 2031 ²
Cumulative Public Services	Impact C-PS-1: The proposed action, in combination with cumulative projects, would not result in a significant cumulative impact on public services. (LTS)	Similar. (LTS)
Biological Resources		
Candidate, Sensitive, or Special-status Species	Impact BIO-1: The proposed action would not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. (LTS)	Similar. (LTS)
Riparian Habitat or Other Sensitive Natural Community	Impact BIO-2: The proposed action would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. (LTS)	Similar. (LTS)
Wetlands	Impact BIO-3: The proposed action would not have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means. (LTS)	Similar. (LTS)
Migration of native resident or migratory species	Impact BIO-4: The proposed action would not interfere substantially with the movement of any native resident or migratory fish or wildlife species, or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. (LTS)	Similar. (LTS)
Conflict with Existing Policies	Impact BIO-5: The proposed action would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. (LTS)	Similar. (LTS)
Cumulative Biological Resources	Impact C-BIO-1: The proposed action, in combination with cumulative projects, would not result in a significant cumulative impact on biological resources. (LTS)	Similar. (LTS)

	Construction of 150,000 Housing Units Between 2020 and 2050 ¹	Construction of 82,070 Housing Units Between 2023 and 2031 ²
Geology and Soils		
Surface Fault Rupture, Seismic Ground Shaking, Ground Failure, Liquefaction, Landslides	Impact GE-1: The proposed action would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, strong seismic ground shaking, seismically related ground failure, liquefaction, or landslides. (LTS)	Similar. (LTS)
Erosion	Impact GE-2: The proposed action would not result in substantial soil erosion or the loss of topsoil. (LTS)	Similar. (LTS)
Geologic Unit/Unstable Soil	Impact GE-3: The proposed action would not result in a substantial risk of loss, injury, or death involving unstable geologic units or soils or onsite or offsite landslide, lateral spreading, subsidence, liquefaction or collapse. (LTS)	Similar. (LTS)
Expansive Soils	Impact GE-4: The proposed action would not result in a substantial risk of loss, injury, or death related to expansive soils. (LTS)	Similar. (LTS)
Cumulative Geology and Soils	Impact C-GE-1: The proposed action, in combination with cumulative projects, would not result in a significant cumulative impact on geology and soils. (LTS)	Similar. (LTS)
Paleontological Resources		
Paleontological Resources	Impact GE-5: The proposed action would directly or indirectly destroy a unique paleontological resource or site. (LTSM)	Similar. (LTSM)
Cumulative Paleontological Resources	Impact C-GE-2: The proposed action, in combination with cumulative projects, would result in a significant cumulative impact on paleontological resources. (LTS)	Similar. (LTS)
Hydrology and Water Quality		
Water and Groundwater Quality	Impact HY-1: The proposed action would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. (LTS)	Similar. (LTS)

	Construction of 150,000 Housing Units Between 2020 and 2050 ¹	Construction of 82,070 Housing Units Between 2023 and 2031 ²
Groundwater	Impact HY-2: The proposed action would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project would impede sustainable groundwater management of the basin. (LTS)	Similar. (LTS)
Drainage	Impact HY-3: The proposed action would not substantially alter the existing drainage pattern of the area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner that would result in substantial erosion, siltation, or flooding on- or offsite, substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or offsite, or create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. (LTS)	Similar. (LTS)
Flooding	Impact HY-4: In flood hazard, tsunami, or seiche zones, the proposed action would not risk a release of pollutants due to project inundation. (LTS)	Similar. (LTS)
Water Quality Control Plan or Groundwater Management Plan	Impact HY-5: The proposed action would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. (LTS)	Similar. (LTS)
Cumulative Hydrology	Impact C-HY-1: The proposed action, in combination with cumulative projects, would not result in a significant cumulative impact on hydrology and water quality. (LTS)	Similar. (LTS)
Hazards and Hazardous Materials		
Transit and Disposal	Impact HAZ-1: The proposed action would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. (LTS)	Similar. (LTS)
Upset and Accidental Conditions	Impact HAZ-2: The proposed action would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. (LTS)	Similar. (LTS)

	Construction of 150,000 Housing Units Between 2020 and 2050 ¹	Construction of 82,070 Housing Units Between 2023 and 2031 ²
Schools	Impact HAZ-3: The proposed action would not emit hazardous emissions or involve handling hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school. (LTS)	Similar. (LTS)
Government Code section 65962.5	Impact HAZ-4: The proposed action could be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code section 65962.5, but would not create a significant hazard for the public or the environment due to regulations. (LTS)	Similar. (LTS)
Emergency Response	Impact HAZ-5: The proposed action would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. (LTS)	Similar. (LTS)
Cumulative Hazards	Impact C-HAZ-1: The proposed action, in combination with cumulative projects, would not result in a significant cumulative impact on hazards. (LTS)	Similar. (LTS)
Energy		
Construction and Operation Energy	Impact EN-1: The proposed action would not result in a significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation. (LTS)	Similar. (LTS)
Conflict with Energy Plan	Impact EN-2: The proposed action would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. (LTS)	Similar. (LTS)
Cumulative Energy	Impact C-EN-1: The proposed action, in combination with cumulative projects, would not result in a significant cumulative impact on energy. (LTS)	Similar. (LTS)

Notes:

1. This column shows the indirect environmental impacts of the proposed action, assuming housing development growth projections greater than regional housing needs allocation (RHNA) numbers, but over a longer period: construction of 75,000 housing units between 2020 and 2035 and 150,000 housing units from 2020 to 2050 (delta). As noted in Response PD-1, this delta is used for the baseline plus proposed action impact analysis, while the cumulative impact analysis considers the impacts that would result from 150,000 additional housing units from 2020 to 2050, among other cumulative projects.
2. This column shows the indirect environmental impacts of the proposed action, assuming housing development growth projections of an accelerated construction of RHNA number: 82,070 housing units between 2023 and 2031.
3. Refer to additional informational analysis following this table for these statements.

Draft EIR Construction-Related Analysis

As discussed in the draft EIR, the construction-related impact analysis of the housing element update accounts for the impacts of overlapping construction associated with future development consistent with the housing element update and other cumulative projects. The construction-related impact analyses are based on reasonably foreseeable projections that forecast the construction of 5,000 housing units per year in the city. Some years may have more than 5,000 housing units, and some years may have fewer than 5,000. Given a standard construction schedule of approximately two years for individual future housing developments, the city could have approximately 10,000 housing units or more under construction in any given year.

Construction-related impacts are typically localized. In addition, construction analyses typically require more details regarding the location and timing of overlapping construction projects; these details are appropriate for a development project level analysis and generally cannot be known at this time for a programmatic analysis like the housing element update. Based on this and expanded on below, the draft EIR adequately addresses the programmatic impacts associated with the accelerated construction of the RHNA number: 82,070 housing units between 2023 and 2031, or 10,260 housing units per year.

Transportation – construction

Impact TR-1 and Impact C-TR-1 address construction-related transportation impacts in existing plus project and cumulative conditions, respectively. As stated on draft EIR, p. 4.4-79 under Approach to Analysis:

“The construction impact analysis assesses if future development consistent with the proposed action would require a substantially extended construction duration or intense construction activity and, if so, the analysis assesses the effects of construction activities on people walking, bicycling, or driving, and riding public transit and on emergency vehicle operators [roadway users]. Potential short-term construction impacts on sidewalks, in bicycle lanes, and/or in travel lanes were assessed qualitatively, based on general construction-related information for activities associated with other similar development projects as may occur from future development consistent with the proposed action.”

The draft EIR concludes that the proposed action and cumulative impacts could result in significant construction-related transportation impacts due to, among other items, “construction activities associated with multiple overlapping projects” (p. 4.4.-92). If the proposed action would lead to the construction of 10,000 housing units per year instead of 5,000 housing units per year, the proposed action’s impact would not double or be substantially more severe than that described in the draft EIR because the impact to any roadway user would be localized and highly dependent on number of projects under construction in the local, or immediate, area and not dependent on the number of projects under construction in the city overall. A similar approach is taken for cumulative construction.

Noise – construction

Impact NO-1 and Impact C-NO-1 address construction-related noise impacts in existing plus project and cumulative conditions, respectively. The draft EIR concludes that the proposed action and cumulative impacts could result in significant construction-related noise impacts. Impact NO-1 discusses the potential for construction from multiple future development projects occurring simultaneously or consecutively (e.g.,

multiple housing projects on the same block). Effects on the temporary noise environment are dependent on the distance between projects as well as the distance between each project and sensitive receptors. If the proposed action would lead to the construction of 10,000 housing units per year instead of 5,000 housing units per year, the proposed action's impact would not double or be substantially more severe than that described in the draft EIR because the impact to any sensitive receptor would be localized and highly dependent on the number of projects under construction in the local, or immediate, area and not dependent on the number of projects under construction in the city overall. A similar approach is taken for cumulative construction.

Vibration – construction

Impact NO-3 addresses construction-related vibration impacts in existing plus project conditions. The draft EIR concludes that the proposed action could result in significant construction-related vibration impacts, but it's not because of the potential for multiple overlapping projects under construction. As stated on draft EIR p. 4.5-56 for Impact NO-3:

“Unlike the analysis for average noise levels, in which noise levels of multiple pieces of equipment can be combined to generate a maximum combined noise level, instantaneous peak vibration levels do not combine in this way. Vibration from multiple construction sites, even if they are located close to one another, would not combine to raise the maximum PPV [peak particle velocity]. For this reason, the impact of construction vibration from multiple development projects consistent with the proposed action and located near one another would not combine to further increase vibration levels. In essence, vibration effects are highly localized. Thus, vibration impacts resulting from construction of multiple future development projects consistent with the proposed action would not combine so as to increase vibration impacts on existing adjacent buildings or structures.”

If the proposed action would lead to the construction of 10,000 housing units per year instead of 5,000 housing units per year, the proposed action's impact would not double or be substantially more severe than that described in the draft EIR because the impact to any sensitive receptor or building would be localized and would not combine with other projects under construction. For this reason, cumulative vibration impacts are also not discussed in the draft EIR.

Fine Particulate Matter and Toxic Air Contaminants – construction

Impact AQ-5 and Impact C-AQ-1 address construction-related (and operation-related) fine particulate matter (PM_{2.5}) and toxic air contaminant air quality impacts in existing plus project and cumulative conditions, respectively. Like the approaches taken for the topics above, draft EIR p. 4.6-66 for Impact AQ-5 states:

“The PM_{2.5} concentrations and cancer risk that receptors are exposed to from future development consistent with the proposed action is dependent on several factors, such as background concentrations, the contribution of the individual projects, and the location of the sensitive receptors in relation to construction and operational activity. These factors are project and location specific; thus, outcomes for specific receptors cannot be modeled at this time because no specific development is proposed under the proposed action. Rather, the potential for future development to expose sensitive

receptors to substantial pollutant concentrations is evaluated in a generalized manner, based on quantitative results from the range of building types consistent with the proposed action.”

The draft EIR concludes that the proposed action and cumulative impacts could result in significant construction-related fine particulate matter and toxic air contaminant impacts based on the quantitative results from the range of building types consistent with the proposed action.⁴ If the proposed action would lead to the construction of 10,000 housing units per year instead of 5,000 housing units per year, the proposed action’s impact would not double or be substantially more severe than that described in the draft EIR because the impact to any sensitive receptor would be localized and highly dependent on number of projects under construction in the local, or immediate, area and not dependent on the number of projects under construction in the city overall. Further, the changed assumption of number of housing units per year would not change the range of building types consistent with the proposed action studied in the draft EIR. A similar approach is taken for cumulative construction.

⁴ Impact AQ-5 considers the construction- and operational-related (e.g., traffic emissions) impacts from the proposed action, as a sensitive receptor may be exposed to the emissions from both phases of a housing development project and its associated health impacts.

This Page Intentionally Left Blank

ATTACHMENT 6

Revised Housing Element 2022 Update Modeling and Projections (EIR Appendix C)

Text changes have been made to EIR Appendix C, Housing Element 2022 Update Modeling and Projections (specifically Appendix A of Appendix C) to clarify which percent of each planning district is located in a well-resourced area. Preservation Alternative Methodology, Appendix C to the Housing Element 2022 Update Modeling and Projections, has been updated to reflect the fourth draft of the San Francisco Housing Element 2022 Update, October 2022.

Appendix A: Total Housing Units by Planning District by Land Use Pattern

		2050 Housing Element 2022													
		2020		2050 Baseline		Update		2050 Preservation		2050 Eastside ¹		2050 Dispersed Growth ¹		2050 Plan Bay Area 2050	
Planning Districts	% of District in well-resourced area ²														
		Total Units	% of Total	Total Units	% of Total	Total Units	% of Total	Total Units	% of Total	Total Units	% of Total	Total Units	% of Total	Total Units	% of Total
Bernal Heights	0%	9,875	2.4%	10,136	2.0%	9,919	1.8%	9,919	1.8%	10,081	1.8%	10,608	1.9%	11,106	1.9%
Buena Vista	91%	16,921	4.2%	18,253	3.6%	19,830	3.5%	19,819	3.5%	18,438	3.3%	18,551	3.3%	22,618	3.8%
Central	71%	25,544	6.3%	25,782	5.1%	28,716	5.1%	30,744	5.5%	25,999	4.6%	29,548	5.3%	30,510	5.1%
Downtown	0%	37,453	9.2%	44,450	8.7%	42,685	7.6%	42,685	7.6%	55,967	10.0%	48,056	8.6%	52,103	8.7%
Golden Gate Park	0%	0	0.0%	0	0.0%	0	0.0%	0	0%	0	0.0%	0	0.0%	0	0.0%
Ingleside	40%	27,220	6.7%	40,285	7.9%	47,079	8.4%	45,952	8.2%	38,838	6.9%	45,735	8.1%	41,867	7.0%
Inner Sunset	100%	18,421	4.5%	18,973	3.7%	29,995	5.4%	30,318	5.4%	18,813	3.3%	22,861	4.1%	22,243	3.7%
Marina	100%	25,089	6.2%	25,401	5.0%	29,594	5.3%	29,161	5.2%	30,746	5.5%	26,412	4.7%	29,441	4.9%
Mission	0%	27,546	6.8%	37,682	7.4%	36,419	6.5%	36,419	6.5%	45,046	8.0%	39,668	7.1%	46,913	7.9%
Northeast	44%	38,438	9.4%	39,089	7.7%	39,762	7.1%	40,837	7.3%	41,238	7.3%	39,530	7.0%	51,002	8.6%
Outer Sunset	100%	27,012	6.6%	27,962	5.5%	42,305	7.6%	42,645	7.6%	27,396	4.9%	38,974	6.9%	31,612	5.3%
Presidio	0%	1,214	0.3%	1,215	0.2%	1,214	0.2%	1,214	0.2%	1,237	0.2%	1,276	0.2%	1,214	0.2%
Richmond	100%	36,821	9.0%	39,186	7.7%	51,728	9.3%	52,486	9.4%	40,751	7.3%	45,795	8.2%	50,907	8.5%
South Bayshore	0%	17,058	4.2%	32,330	6.4%	31,745	5.7%	31,745	5.7%	35,512	6.3%	31,590	5.6%	46,167	7.7%
South Central	0%	29,237	7.2%	31,460	6.2%	30,864	5.5%	30,864	5.5%	30,358	5.4%	36,841	6.6%	36,131	6.1%
South of Market	0%	36,882	9.1%	68,305	13.4%	62,429	11.2%	62,429	11.2%	86,097	15.3%	75,255	13.4%	69,779	11.7%
Treasure Island	0%	682	0.2%	10,927	2.1%	10,911	2.0%	10,911	2.0%	11,072	2.0%	11,078	2.0%	11,470	1.9%
Western Addition	57%	31,631	7.8%	37,294	7.3%	43,405	7.8%	40,449	7.2%	44,278	7.9%	40,091	7.1%	41,264	6.9%
Total	N/A	407,044	100.0%	508,730	100.0%	558,600	100.0%	558,600	100.0%	561,869	100.0%	561,869	100.0%	596,348	100.0%

Notes:

1. The modeling of the 2050 Eastside and Dispersed Growth land use patterns inadvertently double counted existing units in approximately 41 TAs resulting in an error of approximately 3,200 excess units, primarily locating in the northwest quadrant of San Francisco, This modeling error does not affect any of the conclusions presented in the EIR.
2. Well-resourced areas are high- and highest-resource areas, which are neighborhoods identified by the State of California that provide strong economic, health, and educational outcomes for its residents. This percentage is based on state data from 2021; the state annually updates the opportunity area maps based on updated economic, education, and health data. As a result, the opportunity area map boundaries may slightly fluctuate year to year.



PRESERVATION ALTERNATIVE METHODOLOGY

Date: ~~April 6~~ October 20, 2022
Case Number: 2019-016230ENV
Project Name: San Francisco Housing Element 2022 Update
Zoning: VAR
Block/Lot: VAR
Project Sponsor: San Francisco Planning Department, Community Equity Division
Kimia Haddadan, Kimia.haddadan@sfgov.org
Maia Small, maia.small@sfgov.org
Staff Contact: Allison Vanderslice, allison.vanderslice@sfgov.org
Elizabeth White, elizabeth.white@sfgov.org

Preservation Alternative

An Environmental Impact Report (EIR) requires a reasonable range of alternatives that meet most project objectives and reduce significant impacts, in this case, from the future development resulting from the Housing Element 2022 Update (housing element update). One preservation alternative is proposed for the Housing Element 2022 Update EIR (EIR). The aim of the Preservation Alternative is to reduce impacts to built-environment historic resources while still meeting most of the housing element update goals. The Preservation Alternative addresses minimizing or reducing effects on built-environment historic resources as a significant and unavoidable impact was identified for these resources in the EIR, see Section 4.02 Cultural Resources.¹ The Preservation Alternative aims to reduce impacts to built-environment historic resources but does not assume that the alternative will reduce all significant historic resource impacts to a less than significant level. To achieve this, draft policies of the housing element update under the Preservation Alternative would be modified to reduce physical development that could impact built-environment historic resources. The alternative assumes that built-environment historic resource mitigation measures proposed in the Section 4.02 Cultural Resource of the EIR would also be included in the Preservation Alternative to assist in reducing historic resource impacts.

This Preservation Alternative was brought to the historic preservation commission (HPC) for review and comment on October 20, 2021. The HPC found the preservation alternative to be adequate.

¹ Built-environment historic resources are generally above-ground buildings, structures and objects and are distinguished from archeological resources, refer to Section 4.02 Cultural Resources of the EIR. The use of historic resources in this memo refers to built-environment historic resources, which are the focus of the preservation alternative.

Preservation Alternative Goals and Policies

The Preservation Alternative includes revisions to draft housing element 2022 update goals and policies with the aim to reduce impacts to historic resources. The draft policies of the housing element update would be revised under the Preservation Alternative with the aim to preserve built-environment historic resources by protecting parcels with individually significant resources from future development, promoting the use of the Secretary of the Interior's Standards for Rehabilitation (secretary's standards) in the future development of parcels with historic resources, and requiring development in historic districts to be compatible with those districts.

Proposed policy changes, with revisions to policy language shown in ***bold italics***, are shown below. The below is based on the draft goals and policies released to the public on October 6~~March 25~~, 2022.

Policy 19. Enable low and moderate-income households, particularly American Indian, Black, and other people of color, to live and prosper in [Well-resourced Neighborhoods](#) by increasing the number of permanently affordable housing units in those neighborhoods ***while preserving built-environment historic resources.***

Policy 20. Increase mid-rise and small multi-family housing types in by adopting zoning changes or density bonus programs [Well-resourced Neighborhoods](#) and adjacent lower-density areas near transit, including along SFMTA Rapid Network² and other transit, ~~and throughout lower density areas, by adopting zoning changes or density bonus programs~~ ***while preserving built-environment historic resources.***

Policy 24. ~~Support~~Enable mixed-income development projects to maximize the number of permanently affordable housing constructed, in balance with delivering other permanent community benefits that advance racial and social equity ***and preserve built-environment historic resources.***

Policy 25. Reduce ~~governmental development constraints on development in~~ [Well-resourced Neighborhoods](#) ~~to enable small and mid-rise multi-family buildings providing such as lengthy City-permitting process and high construction costs to increase~~ improved housing choices and ~~improve~~ affordability ***while preserving built-environment historic resources.***

Policy ~~3126~~3126. Facilitate small and mid-rise multi-family buildings ~~as a prominent housing type that private development can deliver to serve middle-income households without deed restriction, including through adding units in expansion or demolition of existing lower density areas housing,~~ or by adding [Accessory Dwelling Units \(ADUs\)](#) ***while preserving built-environment historic resources.***

Policy ~~4136~~4136. Shape urban design policy, standards, and guidelines to enable cultural and identity expression, advance architectural creativity and durability, and foster neighborhood belonging ***while preserving built-environment historic resources.***

Policy ~~4237~~4237. Support cultural uses, activities, and architecture that sustains ***and preserves*** San Francisco's ~~diverse dynamic and unique cultural heritages.~~

² The 13 rail and bus lines that account for the majority of Muni's ridership. Before the pandemic, Rapid Network lines were scheduled to operate every 10 minutes or better all day on weekdays.

Preservation Alternatives Analysis

The goal of this analysis is to identify projected development that could occur if the revised Preservation Alternative policies were implemented in comparison to the proposed action. As noted above, the housing element update policies developed under the Preservation Alternative would aim to preserve built-environment historic resources. This would be achieved by protecting parcels with individual historic resources from future development, promoting the use of the secretary's standards in the future development of parcels with historic resources, and requiring development in historic districts to be compatible with historic districts. Under the Preservation Alternative, the revised policies would be implemented primarily through streamlining rehabilitation projects, site-specific design review, and the development of objective design guidelines that focus on protecting historic resources under this alternative.

The department anticipates the following project types would result from the revised policies of the Preservation Alternative:

- New construction in historic districts would prioritize development of small and midrise multi-family buildings on non-contributing parcels that would be compatible in scale, materials, and massing with the historic districts.
- On sites with properties that contribute to historic districts, housing density would be increased, primarily through the construction of accessory dwelling units, which would be designed to meet the secretary's standards.
- New development projects on parcels that contain built-environment historic resources would be sited and designed to reduce impacts on the resource, such as developing vacant or non-character-defining portions of the parcel.

To align with the objectives of the proposed action and reduce impacts on built-environment historic resources, the Preservation Alternative analysis redistributed units within well-resourced areas³ to neighborhoods with potential to accommodate future development without resulting in significant impacts on historic resources.

The list of neighborhoods included in the Preservation Alternative is the following:

- | | |
|-------------------------|----------------------------------|
| • Castro - Upper Market | • Oceanview - Merced - Ingleside |
| • Glen Park | • Outer Richmond |
| • Haight Ashbury | • Pacific Heights |
| • Hayes Valley | • Presidio Heights |
| • Inner Richmond | • Russian Hill |
| • Inner Sunset | • Seacliff |
| • Japantown | • Sunset/Parkside |
| • Lone Mountain - USF | • Twin Peaks |
| • Marina | • West of Twin Peaks |
| • Nob Hill | • Western Addition |
| • Noe Valley | |

³ <https://www.sfhousingelement.org/well-resourced-neighborhoods>

The Preservation Alternative unit reallocation analysis was undertaken at the neighborhood scale matching the scale of analysis undertaken for the built-environment historic resource analysis for the proposed action. As discussed below, the unit reallocation was then converted from the neighborhood scale to the planning district scale. See Figure 2-2 in the EIR for boundaries of 41 neighborhoods and the 18 planning districts.

Preservation Alternative Analysis Methodology

The Preservation Alternative used the following methodology to determine unit calculations and unit reallocation from the proposed action. As noted above, this analysis only included neighborhoods in well-resourced areas.

Preservation Alternative Unit allocation calculation methodology

1. Identify the sites of known historic resources in the well-resourced areas by neighborhood.
2. Calculated the net unit capacity of the known historic resource sites in the well-resourced areas by neighborhood.
 - a. Net capacity is the *potential units* that could be developed on a site with enacted zoning changes implied by the proposed project including height increases, density limit removal, or density increases minus the *existing units* on that site.
3. Retained sites that meet the soft site criteria as a proxy for development likelihood based on financial feasibility.
 - a. Soft site is defined as any site where the *existing units* represent 30% or less of the *potential unit capacity* that would be possible under the Housing Element.
4. Applied an additional “likelihood” factor to estimate how many sites would actually be develop given a number of intangible and random factors, such as lot consolidation, owner choice, land basis variability, legal complications, difficult soil conditions, etc.
 - a. Assumed that only 10% of projects with less than 100-unit net capacity and 50% of projects with equal to or more than 100-unit capacity will be developed.
 - a. This ratio is based on the common types of applicants, industry practices, and construction challenges at the scale of these sites (e.g., larger sites are more likely to overcome such challenges).
5. Consolidated by neighborhood to produce a total number of units that would be reallocated to other places that have capacity and fewer known historic resource and future anticipated historic resource sites (see below).

Preservation Alternative projected development growth redistribution methodology

To meet the same unit count as the proposed action, under the Preservation Alternative the units would be redistributed to likely sites in other areas of the well-resourced neighborhoods. The redistribution process was done as follows:

1. Created a reallocation factor by neighborhood based on two pieces of analysis:
 - a. 2050 Historic Resource Forecast Percentage.⁴ This percentage was determined for the historic resource impact analysis. It factors in percentage of known historic resources, percentage of evaluated and unevaluated historic resources, the percentage of historic resources that will become age-eligible by 2050, and percentage of cultural districts and cultural enclaves

⁴ See Section 4.2 Cultural Resources of the Housing Element 2022 Update EIR for additional information on the 2050 Historic Resource Forecast.

identified in historic context statements within each neighborhood to predict the percentage of parcels with historic resources by 2050. This percentage was inversed to create an allocation factor so that more units would be allocated to neighborhoods expected to have fewer future resources.

- b. Neighborhood Historic Resource Pattern Analysis. This analysis refined the reallocation factor above and is described in more detail below. The outcome of the analysis was identification of neighborhoods that should not be part of the reallocation, this included: Castro-Upper Market, Haight-Ashbury, and Noe Valley. And the identification of neighborhoods where the above reallocation factor should be modified: Japantown, Inner Richmond, and Inner Sunset.
2. Removed neighborhoods indicated for removal under b. above from reallocation.
3. Applied the allocation factor determined in a. above, to total units indicated by neighborhood with the modifications identified under b.

Neighborhood Historic Resource Pattern Analysis

This analysis sought to refine the reallocation factor that was based on the 2050 historic resource forecast, see 1.a above. The goal of this analysis was to determine if the reallocation factor needed refinement for each neighborhood based on the following: general capacity of known historic districts to absorb additional housing development without resulting in a significant impact on the district; projected distribution of development under the proposed action in relationship to known individual historic resources and redistribution of those units to avoid individual built-environment historic resources; and projected distribution of development under the proposed action in relationship to potential historic resources, such as those identified in final historic context statements or locations of cultural districts. This analysis took into consideration for each neighborhood the total net unit capacity (defined above), number of units allocated in the proposed action, relationship of proposed units in regard to known historic districts and individual historic resources, and locations, and numbers of potential historic resources, along with the 2050 historic resource forecast.

For the Castro-Upper Market, Haight-Ashbury, and Noe Valley neighborhoods this analysis determined that Preservation Alternative policies would adequately reduce the impacts of the units allocated to these neighborhoods under the proposed action. It was also determined that due to the number of proposed units in the neighborhood under the proposed action, the number of units in the pipeline and proposed between 2020-2050, the number and location of known resources, the number and location of potential resources identified in adopted context statements, and the 2050 forecast, that these neighborhoods had limited capacity for additional development beyond what is projected under the proposed action without resulting in a significant impact to historic resources. Therefore, the reallocation factor was modified so that no additional projected growth was added to these neighborhoods.

For the Japantown neighborhood, this analysis determined that due to the scale and location of known historic resources and potential historic resources, in relationship to unit allocation under the proposed action, additional units should be removed from this neighborhood to avoid historic resource impacts. Therefore, it was determined that half of the units from the difference in units of the proposed action and 2050 baseline would be removed from this neighborhood.

For the Inner Richmond and Inner Sunset neighborhoods, this analysis determined that both neighborhoods had capacity for additional development beyond the unit reallocation based on the 2050 historic resource forecast alone. This determination was based on the number of proposed units in the neighborhood under the

proposed action, the number of units in the pipeline and proposed between 2020-2050, the number and location of known built-environment historic resources, the number and location of potential historic resources, and the 2050 forecast. Therefore, in the unit reallocation, the unit reallocation factor was modified to add additional projected growth to these neighborhoods.

Methodology to Convert Neighborhood analysis to Planning Districts

The Housing Element 2022 Update EIR typically characterizes the growth anticipated under the studied land use patterns into 18 planning districts. However, the built-environmental historic resource analysis characterized growth by neighborhood, not planning district. Neighborhoods are a more granular way of examining various geographies of San Francisco – for reference, there are 41 different neighborhoods used in the analysis. Neighborhoods were determined to be a more appropriate scale for analyzing built resource impacts as opposed to planning districts. See Figure 2-2 in the EIR for boundaries of the neighborhoods and planning districts.

The planning department converted the Preservation Alternative's projected growth from neighborhoods into planning districts to ensure a "like for like" comparison to the proposed action. Not all of the 41 neighborhoods used for the built-environment historic resource analysis neatly fit into planning districts; for example, portions of the West of Twin Peaks neighborhood are located in both the Inner Sunset and Ingleside planning districts and portions of the Inner Sunset neighborhood are located in both the Inner Sunset and Central planning districts. Although some neighborhoods do not neatly fit into planning districts, both planning districts and neighborhoods can be further broken down into a common denominator: transportation analysis zones. For example, the Inner Sunset neighborhood consists of 28 transportation analysis zones, each of which is classified as located in either the Inner Sunset or Central planning district. Using the transportation analysis zones, the department applied the methodology described below to convert new units projected under the Preservation Alternative from neighborhoods into planning districts. The department applied this methodology to neighborhoods that are split among multiple planning districts located in well-resourced areas and where the growth projected under the Preservation Alternative differed from the proposed action.

- First, the department examined the net new units projected in each neighborhood under the proposed action. For example, under the proposed action, the Inner Sunset neighborhood is projected to have approximately 18,100 more new units by 2050 when compared to 2020 conditions. The Inner Sunset neighborhood is split between two planning districts: Central and Inner Sunset. Using the transportation analysis zone data, the department determined that 5% of units, or 825 units of the Inner Sunset neighborhood's projected 18,100 units, are located in the Central planning district and that 95%, or approximately 17,264 units of the Inner Sunset neighborhood's projected 18,100 projected units, are located in the Inner Sunset planning district.
- Next, the department compared the number of units anticipated under the Preservation Alternative to the proposed action. For example, under the Preservation Alternative, the Inner Sunset neighborhood is projected to have approximately 19,500 more new units above 2020 conditions; the projected 19,500 units is approximately 1,400 more units when compared to the proposed action (19,500 units under Preservation Alternation -18,100 units under the Proposed Action = 1,400 units).
- Finally, the department applied the percentage calculated from the proposed action to the net units anticipated in the Preservation Alternative. For example, given that 1,400 more units are anticipated in the

Inner Sunset neighborhood under the Preservation Alternative, it is anticipated that 95% of those net new units, or approximately 1,300 units ($1,400 \text{ units} \times 0.95 = 1,300 \text{ units}$), would occur in the Inner Sunset planning district and that 5% of the net new units and 5% of the net new units, or approximately 100 units ($1,400 \times .05 = 100$), would occur in the Central planning district.

The department either added or subtracted the projected net new units or net lost units to the proposed action's planning district unit totals. In summary, the department applied this methodology for all neighborhoods located in well-resourced areas that are split between multiple planning districts. These neighborhoods included: Hayes Valley, Inner Sunset, Twin Peaks, Sunset/Parkside, West of Twin Peaks, Pacific Heights, and Lone Mountain.

Conclusion of the Preservation Alternative Analysis

Based on the above analysis, the Housing Units by Planning District for all Land Use Patterns table in Appendix A (of this Housing Element 2022 Update Modeling and Projections memo) shows the projected development under the Preservation Alternative compared to the proposed action, the 2050 environmental baseline, and the land use patterns of the other alternatives analyzed for the EIR. This table shows the minimal redistribution of units between the proposed action and the projected development under the Preservation Alternative. As the Preservation Alternative analysis assumes that policies revised under this alternative would be implemented primarily through a variety of site-specific reviews, development of design guidelines, and implementation of mitigation measures, this alternative did not include revisions to height limits or density controls projected under the proposed action. As discussed above, development under the Preservation Alternative would aim to preserve built-environment historic resources by protecting parcels with individually significant resources from future development, promoting the use of the secretary's standards in the future development of parcels with historic resources, and require development in historic districts to be compatible with historic districts.

ATTACHMENT 7

Revised Cultural Resources Supporting Information (EIR Appendix F)

CONTENTS

Appendix F.1: Built-Environment Resources Tables

Table F-1. Final Neighborhood and EIR Surveys..... F.1-1

Table F-2. Analysis Neighborhood Summaries F.1-9

Table F-3. Historic Context Statements Addressing Social History and Cultural Heritage F.1-26

Table F-4. Established Cultural Districts..... F.1-30

Table F-5. Context Statements and Theme Studies Addressing Neighborhoods with Greatest
Likelihood of Change under the Housing Element Update..... F.1-32

Appendix F.2: San Francisco Housing Element Update 2022 Archaeological Sensitivity Assessment

Appendix F.1: Built-Environment Resources Tables

Table F-1. Final Neighborhood and EIR Surveys

Survey Name	Year Adopted	Thematic Scope and/or Geographic Extent	Details on Historic Context	Special Considerations for Evaluations
Here Today	1968	Resources citywide identified as having significance.	Provides general information on historic development and architectural patterns in neighborhoods containing surveyed resources.	Does not assign ratings to buildings or involve in-depth archival research or formal historical evaluations of the surveyed resources. All resources included in the survey are considered significant. Listed resources are presumed architecturally significant.
Downtown Plan Survey	1977–1983	Architecturally and historically significant buildings within the C-3 Downtown zoning district previously surveyed by the Department of City Planning and San Francisco Architectural Heritage.	None included.	Assigns resources to one of four ranked categories, I–IV, generally based on architectural and environmental importance; categories I and II represent the most significant buildings that require preservation, while categories III and IV represent “contributing” buildings whose preservation is encouraged.
North Beach Architectural, Historical Cultural Survey	1982	Commercial, residential, and industrial buildings within the North Beach neighborhood, generally following the Columbus Avenue corridor between Broadway and Francisco Street.	Addresses North Beach’s architectural characteristics, general setting and physical development, and social and ethnic (specifically Italian-American) history from 1880 to 1920.	Assigns resources to numbered categories, 1–6; category 1 denotes individually significant resources, while categories 2 and 3 denote contributing resources.

Survey Name	Year Adopted	Thematic Scope and/or Geographic Extent	Details on Historic Context	Special Considerations for Evaluations
Chinatown Historic District Draft National Register Designation and Landmark District Survey	1985; 1991	Resources associated with San Francisco's significant Chinese urban enclave, including association buildings, various community organizations, newspaper buildings, religious buildings, commercial establishments, and schools.	Describes the growth and social dynamics of San Francisco's Chinatown beginning in the mid-19 th century, covering anti-Chinese discrimination, labor history, the establishment of numerous types of community institutions, and the use of Chinese-derived architectural motifs.	Each survey and designation report proposes a single historic district associated with the significant social and urban history of the Chinatown neighborhood. The 1991 Landmark District survey proposed 1906–1930 as the period of significance and identified contributory, altered/contributory, and non-contributory properties to the district.
Central Waterfront Cultural Resources Survey and Context Statement	2001	Resources located along San Francisco's eastern waterfront south of 16 th Street, east of Interstate 280, and north of Islais Creek.	Presents an overview of physical development of the central waterfront.	Uses standard evaluative approaches.
Inner Mission North Historic Context Statement and Survey	2004	Resources within three survey areas comprising the northern portion of the Inner Mission neighborhood.	Describes residential and commercial development and property types, as well as social and demographic history, in the Inner Mission North neighborhood; focuses on the period between the mid-19 th and mid-20 th centuries.	Uses standard evaluative approaches.
Transbay Terminal/Caltrain Downtown Extension/Redevelopment Project Environmental Impact Report	2004	Resources within a defined area of potential effects surrounding the Transbay Terminal in the South of Market (SoMa) neighborhood.	None provided.	Uses standard evaluative approaches.

Survey Name	Year Adopted	Thematic Scope and/or Geographic Extent	Details on Historic Context	Special Considerations for Evaluations
Historic Context for the Bayview Waterfront Plan and Hunters Point Shipyard	2008	Resources located on the Hunters Point peninsula, generally southeast of Jennings Street and east of U.S. 101.	Focuses on several historical themes that influenced industrial development and social history in the Bayview-Hunters Point neighborhood, including pre-World War II development, operations of the Hunters Point Shipyard, large-scale construction of public housing, and development on Candlestick Point.	Uses standard evaluative approaches.
Visitation Valley Redevelopment EIR Historic Resources Technical Report	2009	Resources located within an area generally following Leland Avenue and Bayshore Boulevard, including the Schlage Lock Company site.	Presents general development trends in the Visitation Valley neighborhood, particularly early residential and transportation development, commercial development in the Leland Avenue Commercial District, and industrial operations at the Schlage Lock Company.	Uses standard evaluative approaches.
Historic Context Statement: Balboa Park Area Plan EIR and Historic Resource Survey	2009	Resources located within an area generally following Ocean Avenue from Manor Drive on the west to San Jose Avenue on the east, with additional parcels on Geneva Avenue and San Jose Avenue. Also includes the entirety of Balboa Park.	Describes historical themes and representative resource types associated with physical development of the Balboa Park Area Plan area, including transportation, real estate construction, commercial history, and recreational park planning.	Uses standard evaluative approaches.

Survey Name	Year Adopted	Thematic Scope and/or Geographic Extent	Details on Historic Context	Special Considerations for Evaluations
Japantown Historic Resources Survey	2009	Residential and commercial buildings, civic/community institutions, industrial buildings, public utilities, and open spaces associated with Japanese-American cultural heritage within an area containing the Japantown neighborhood.	Describes significant ethnic and cultural themes in the development of San Francisco's Japanese and Japanese-American communities in the Western Addition from the 1880s to the present, including late 19 th - and early 20 th -century community formation, World War II internment, postwar return, and urban redevelopment.	Provides guidance for evaluating the significance and integrity of various property types associated with San Francisco's Japanese and Japanese-American communities; integrity guidance stresses feeling and association as the most important aspects when considering properties with cultural and ethnic heritage significance.
Parkmerced EIR Historic Context Statement and Survey	2010	Resources within the Parkmerced residential complex, located between 19 th Street and Lake Merced.	Describes the construction history, planning concepts, and architectural/landscape design of the Parkmerced residential complex, in addition to biographical information on associated design professionals Leonard Schultze and Thomas Church.	Consideration of multi-component resources within the project site reflects cultural landscape documentation and evaluation methodologies within a historic district framework.
Market Octavia Area Plan Historic Context Statement and Historic Resource Survey	2010	Resources within an irregularly shaped survey area following the Market Street corridor between Ninth Street and Noe Street, extending north to Turk Street and south to 17 th Street.	Describes patterns of residential real estate development, commercial construction, and industry and manufacturing in the survey area, with a focus on the late 19 th century to the mid-20 th century.	Establishes evaluative frameworks that consider the relative rarity of commercial, residential, and institutional resource types in evaluations as well as proposed integrity hierarchies for different resource types.

Survey Name	Year Adopted	Thematic Scope and/or Geographic Extent	Details on Historic Context	Special Considerations for Evaluations
Van Ness Auto Row Support Structures: A Survey of Automobile-Related Buildings along the Van Ness Avenue Corridor	2010	Resources located along the Van Ness Avenue corridor between Pacific and Market streets; surveyed resources are associated with San Francisco's early 20 th -century automotive industry and include showrooms, public garages, repair/service shops, and supply stores.	Characterizes the development of automobile-related establishments near Van Ness Avenue between the turn of the 20 th century and c. 1920 and describes common property types associated with this historic context.	Focuses on resources' potential architectural and historical significance associated with the context of San Francisco's early automotive industry.
Showplace Square/ Northeast Mission EIR Historic Context Statement and Survey	2011	Resources located within the Showplace Square neighborhood and northeast portion of the Mission.	Provides information on the industrial, residential, and commercial growth patterns and property types within the survey area, with a focus on the mid-19 th century to 1980.	Uses standard evaluative approaches.
Treasure Island EIR Historic Context Statement and Survey	2011	Resources located on Yerba Buena Island and Treasure Island.	Presents an overview of construction and past uses of Yerba Buena Island and Treasure Island—specifically, the islands' military history, starting in the 19 th century, and the 1939 Golden Gate International Exposition.	Consideration of multi-component resources within the project site reflects cultural landscape documentation and evaluation methodologies; cultural landscape features were considered potential contributors to new or existing historic districts as well as previously identified individual resources.

Survey Name	Year Adopted	Thematic Scope and/or Geographic Extent	Details on Historic Context	Special Considerations for Evaluations
Glen Park Community Plan EIR Historic Resource Survey	2011	Resources within the core of the Glen Park neighborhood.	Focuses on the Glen Park neighborhood's residential, commercial, and institutional development, starting in the second half of the 19 th century, as well as 20 th -century transportation and transit development; presents representative property types associated with these broad context themes.	Uses standard evaluative approaches.
South of Market Historic Context Statement and Historic Resource Survey	2011	Resources within the portion of the SoMa district bounded by Market Street, First Street, Mission Bay, 13 th Street, and South Van Ness Avenue.	Addresses patterns of pre-1906 residential and industrial development, 20 th -century reconstruction and industry, demographics and ethnic communities, labor history, and post-World War II urban redevelopment.	Establishes significance thresholds for four broad property types (i.e., residential, industrial, commercial, and public assembly/institutional buildings).
Transit Center EIR Historic Context Statement and Survey	2012	Resources within an area of the eastern SoMa neighborhood, generally bounded by Market Street, Main Street, Folsom Street, and Third Street.	Describes the historical development of the eastern section of San Francisco's SoMa district, specifically post-1906 reconstruction, working-class history during the Great Depression and World War II, financial investment and redevelopment in the postwar period, and the construction boom of the late 20 th century.	Uses standard evaluative approaches.

Survey Name	Year Adopted	Thematic Scope and/or Geographic Extent	Details on Historic Context	Special Considerations for Evaluations
San Francisco Civic Center Historic District Cultural Landscape Inventory	2015	Cultural landscape features within the Civic Center Historic District.	Presents a detailed history of the urban and landscape evolution of the San Francisco Civic Center during multiple phases of development.	Inventory reflects cultural landscape documentation methodologies, which inform a recommendation that previously identified historic districts in the San Francisco Civic Center should be updated to recognize the site's landscape design significance in the City Beautiful and Modern eras, the contributions of master landscape designers, and the district's associations with 20 th -century social themes, such as the gay rights movement.
Central SoMa Area Plan EIR Historic Context Statement and Survey	2016	Resources in the central SoMa neighborhood bounded by Market Street, Second Street, Townsend Street, and Sixth Street.	Describes various historic urban development and demographic patterns in the center of the SoMa district, including residential construction, religious institutions, transportation systems, post-earthquake residential and commercial reconstruction, ethnic and social groups (such as the Filipino and gay communities), and labor history.	Establishes significance thresholds for residential, industrial, and commercial buildings for the time periods 1906–1936 and 1937–1973.
Better Market Street Project EIR Historical Resource Survey	2019	Designed landscapes, small-scale features, and buildings within and adjacent to the Market Street corridor between The Embarcadero and Octavia Boulevard.	Describes the physical development of Market Street from the mid-19 th century to post-World War II period, with a focus on the following: Market Street's contributions to San Francisco's urban and transportation development, its role in supporting protests and social movements, and its redevelopment using Modernist environmental design principles in the 1960s and 1970s.	Consideration of multi-component resources within the Market Street corridor reflects cultural landscape documentation and evaluation methodologies within a historic district framework.

Survey Name	Year Adopted	Thematic Scope and/or Geographic Extent	Details on Historic Context	Special Considerations for Evaluations
Hub Plan EIR Historical Resource Survey	2019	Resources within an irregularly shaped plan area surrounding the intersection of Market Street and Van Ness Avenue.	Presents a broad overview of the residential, commercial, industrial, and demographic trends in the Hub Plan area between the late 19 th and late 20 th centuries.	Evaluations considered potential historic significance related to social historical contexts, such as second-wave feminism and LGBTQ history, as applicable.
<u>Mission Dolores Neighborhood Historic Context Statement and Survey</u>	<u>2022</u>	<u>Addresses the development of the Mission system in San Francisco and focuses on identifying properties associated with early residential development and post-earthquake construction in the Mission Dolores neighborhood including all or parts of 14 blocks bounded by Market Street to the north; 20th Street to the south; Dolores Street to the east; and Sanchez/Church streets to the west.</u>	<u>Describes the development of the Mission system in San Francisco as well as residential development, commercial development, and property types in the Mission Dolores neighborhood with a focus on the period between the mid-19th and mid-20th centuries.</u>	<u>Uses standard evaluative approaches.</u>

Source: Anne Bloomfield, Randolph Delehanty, and Nancy L. Olmsted, *North Beach San Francisco: An Architectural, Historical Cultural Survey*, prepared for the North Beach Historical Project, San Francisco, CA, 1982; Carey & Co., *Visitacion Valley Redevelopment EIR Historic Resources Technical Report*, prepared for Wagstaff and Associates, San Francisco, CA, 2008; Carey and Co., Inc., *Glen Park Community Historic Resources Evaluation*, prepared for PBS&J, San Francisco, CA, 2010; Philip Choy, et. al. *Chinatown Historic District Case Report*, prepared for the San Francisco Landmarks Preservation Advisory Board, San Francisco, CA, 1991; Circa: Historic Property Development, *Historic Context for the Bayview Waterfront Plan*, prepared for PBS&J, San Francisco, CA, 2008; City and County of San Francisco Department of City Planning, *The Downtown Plan Environmental Impact Report*, San Francisco, CA, 1984; Donna Graves and Page & Turnbull, *Historic Context: Japantown, San Francisco, California*, revised, prepared for the City and County of San Francisco Planning Department, San Francisco, CA, 2011; ICF, *Better Market Street Project Draft Environmental Impact Report*, case file no. 2014.0012E, San Francisco, CA, 2019; ICF, *The Hub Plan, 30 Van Ness Avenue Project, 98 Franklin Street Project and Hub HSD Draft Environmental Impact Report*, case file nos. 2015-000940ENV, 2017-008051ENV, 2016-014802ENV, San Francisco, CA, 2019; Kelley & VerPlank Historical Resources Consulting, *Showplace Square Survey Historic Context Statement*, prepared for the San Francisco Planning Department, San Francisco, CA, 2009; Kelley & VerPlank Historical Resources Consulting, *Transit Center District Survey Historic Context Statement*, prepared for the San Francisco Planning Department, San Francisco, CA, 2008; William Kostura, *Van Ness Auto Row Support Structures: A Survey of Automobile-Related Buildings along the Van Ness Avenue Corridor*, prepared for Department of City Planning, San Francisco, CA, 2010; MIG, *San Francisco Civic Center Historic District Cultural Landscape Inventory*, prepared for the City and County of San Francisco Planning Department, San Francisco, CA, 2015; Roger Olmsted and T.H. Watkins, *Here Today: San Francisco's Architectural Heritage*, San Francisco, CA: Chronicle Books, 1968; Page & Turnbull, *Market and Octavia Area Plan Historic Resource Survey Historic Context Statement*, prepared for the San Francisco Planning Department, San Francisco, CA, 2007; Page & Turnbull, *Market and Octavia Area Plan Historic Resource Survey Survey Report*, prepared for the San Francisco Planning Department, San Francisco, CA, 2007; San Francisco Planning Department, *Central SoMa Historic Context Statement and Historic Resource Survey*, San Francisco, CA, 2015; San Francisco Planning Department, *Central Waterfront Cultural*

Resources Survey Summary Report and Draft Context Statement, San Francisco, CA, October 2001; San Francisco Planning Department, *Inner Mission North 1853-1943 Context Statement*, San Francisco, CA, 2005; TBA West, Inc., *Historic Context Statement: Balboa Park Area Plan and Historic Resource Survey*, prepared for the San Francisco Planning Department, San Francisco, CA, 2008; Turnstone Consulting, *Parkmerced Project Draft Environmental Impact Report*, case file no. 2008.0021E, San Francisco, CA, 2010; Turnstone Consulting., *Treasure Island/Yerba Buena Island Redevelopment Project Environmental Impact Report*, case file no. 2007.0903E, San Francisco, CA, 2011; U.S. Department of Transportation Federal Transit Administration, City and County of San Francisco, Peninsula Corridor Joint Powers Board, and San Francisco Redevelopment Agency, *Transbay Terminal/Caltrain Downtown Extension/ Redevelopment Project Final Environmental Impact Statement/Environmental Impact Report and Section 4(f) Evaluation*, case file no. 2000.048E, San Francisco, CA, 2004.

Table F-2. Analysis Neighborhood Summaries

Figure 2-2, p. 2-4, Chapter 2, Project Description, depicts the locations of each of the following neighborhoods.

Neighborhood	Built-Environment Summary
Bayview Hunters Point	Bayview Hunters Point is bound by 25 th Street to the north, the San Francisco/San Mateo county line to the south, San Francisco Bay to the east, and U.S. 101 to the west. Although subdivided as early as 1862, Bayview was too far from the developed areas downtown to attract much concentrated residential development (beyond Third Street) until the early 20 th century. However, the area's remote location made it ideal for industry, particularly shipbuilding and meatpacking plants. As the district's industrial and residential base grew throughout the 1910s and 1920s, most of the Islais Creek estuary was filled in to make room for new industrial sites and the neighborhood became an enclave for Italian and Maltese workers. However, it was not until World War II that Bayview leapfrogged into the top ranks of industrial zones on the West Coast, following acquisition of the Hunters Point Dry Dock by the U.S. Navy in 1940. During this period, the population of the district exploded as many African American residents moved to Hunters Point to take jobs in the naval shipyard. Thousands of housing units for workers were hastily constructed to meet demand, and development continued until Bayview approached build-out in the 1950s, although redevelopment has remained a constant presence in the neighborhood ever since. Because of systemic disinvestment, environmental degradation, and extensive job losses following closure of the Hunters Point Naval Shipyard in 1974, Bayview struggled economically during the latter half of the 20 th century; yet, it has remained a significant hub for African American life and culture in the city. Today, Bayview is a mixed-use neighborhood, with industrial facilities concentrated along the waterfront and residences clustered around the Third Street commercial corridor.
Bernal Heights	Bernal Heights runs from Cesar Chavez Street to the north, Bayshore Boulevard to the east, John F. Foran Freeway (Interstate 280) to the south, and San Jose Avenue to the west. In its early years, Bernal Heights remained isolated from the more developed areas of San Francisco and was used primarily for ranching and small-scale farming. In 1864, however, the San Francisco – San Jose Railroad opened and passed through the western edge of Bernal Heights. By 1869, a few dozen buildings had been erected in the greater Bernal Heights area. Various transportation improvements during the late 19 th century—especially streetcar lines running on Valencia and Mission Street—led to steady development along the lower slopes of Bernal Heights. As the neighborhood evolved, it assumed a primarily working-class character typified by the construction of modest wood-frame cottages and flats. After the 1906 earthquake and fire, Bernal Heights experienced a sustained period of development. Infill of the steep upper slopes of Bernal Heights followed, and the neighborhood was primarily built out by the 1960s. Today, Bernal Heights remains a solidly residential neighborhood with commercial districts on Mission Street and Cortland Avenue.

Neighborhood	Built-Environment Summary
Castro/Upper Market	<p>Castro/Upper Market spans Dolores Street to the east, Duboce Avenue to the north, Clayton and Buena Vista Avenues to the west, and 21st Avenue to the south. The neighborhood was subdivided beginning in the 1850s but remained mostly farmland until the 1880s when the extension of the Market Street Railway cable car connected the neighborhood to employment opportunities downtown. By 1906, Castro/Upper Market was a thriving streetcar suburb. Following the earthquake, the neighborhood densified significantly. Single family homes remained the most common housing type, but new flats and apartment buildings appeared along the Market Street corridor. Meanwhile, single-family dwellings in Corbett Heights replaced the last vestiges of agriculture in the area. The completion of the Twin Peaks Tunnel in 1917 and the extension of Market Street past its previous terminus at Castro Street in 1918 better connected the area to emerging western neighborhoods. By 1930, Castro/Upper Market was essentially built out and remained relatively unchanged until after World War II when many longtime residents relocated to the western neighborhoods. Attracted by the newly abundant and inexpensive housing stock, members of the LGBTQ community began moving to the area. By the mid-1970s, the Castro was the cultural, economic, and political center for gay San Francisco. Although rising property values beginning in the 1980s made the neighborhood prohibitive for many, it remains an important hub for gay tourism. Today, Castro/Upper Market is a residential neighborhood mixed with the major commercial corridor Market Street and smaller, neighborhood-serving commercial corridors along Castro Street and 18th Street.</p>
Chinatown	<p>Chinatown is bound by Columbus and Pacific Avenues to the north, Mason Street to the west, Sacramento and California streets to the south, and Battery Street to the east. During the Gold Rush, most Chinese immigrants settled near Portsmouth Square in what is now Chinatown. As San Francisco expanded south and west during the 19th century, exclusionary laws and racial violence prevented the Chinese community from living elsewhere. By the beginning of the 20th century, Chinatown was one of the most segregated communities in the country. After the 1906 earthquake leveled the neighborhood, city officials pressured residents to relocate to Hunter's Point, but the Chinese community resisted and quickly rebuilt, using the earthquake as an opportunity to transform Chinatown into a tourist destination. During the rebuilding process, the addition of decorative pagodas, curved canopies, and dragon motifs generated a distinct architectural identity. Although Chinatown was fully rebuilt by 1915 and its tourism industry flourished, the cumulative impacts of redlining led to severe overcrowding and deteriorating conditions by the 1930s. After a prolonged advocacy campaign, Ping Yuen, the first federally funded public housing project for Chinese residents, opened in 1951. When barriers to residential integration began to fall in the 1950s, scores of families left Chinatown, yet the neighborhood remained the primary cultural and commercial center of the city's Chinese-American community until Chinese-American businesses established themselves in the western neighborhoods. In more recent decades, Chinatown has remained one of the city's premier tourist destinations, while emerging as a center for Asian-American activism and community organizing. Today, it is a dense, mixed-use neighborhood with ground floor commercial uses and residences on upper stories.</p>

Neighborhood	Built-Environment Summary
Excelsior	<p>The Excelsior is bound by Interstate 280 to the north, Mission Street to the west, the San Francisco/San Mateo county line to the south, and McLaren Park to the east. The area was used as farmland beginning in 1869 when German, Irish, Italian, and Swiss immigrants created agricultural communities that supplied produce to downtown markets. The Excelsior did not experience widespread residential development until after the 1906 earthquake and fire, when displaced residents relocated from burned areas of the city. These new inhabitants included many Italians from North Beach, whose legacy is evident in extant structures like the Sons of Italy Hall and the Italian-American Social Hall. Residential construction remained steady throughout the 1910s and 1920s as modest Queen Anne style cottages and Craftsman bungalows replaced existing farmland. Beginning in 1912, the Crocker Amazon subdivision marketed an affordable alternative to San Francisco's more expensive residence parks, offering a chance for working class people to own a house in the city with a garden. By the 1940s, the neighborhood was essentially built out. When the Italian community began to leave the Excelsior in the 1960s and 1970s, new residents of Latinx, Filipino, Chinese, Samoan, Cambodian, and Vietnamese ancestry migrated to the neighborhood where they remain in large numbers. Today, the Excelsior is a residential area with access to the Mission Street and Geneva Avenue commercial corridors.</p>
Financial District/South Beach	<p>The Financial District lies in the city's northeast quadrant and borders the San Francisco Bay, North Beach, Chinatown, Nob Hill, the Tenderloin, SoMa, and Mission Bay. The neighborhood's original street grid was platted in 1847 and oriented around the Ferry Building and nearby piers. Although the initial hub of the district was located at Portsmouth Square in what is now Chinatown, the financial heart of the city had, by the 1860s, migrated to the intersection of Market Street and Montgomery Street where three- to five-story buildings fanned out for several blocks in all directions. After the 1906 earthquake and fire obliterated almost all the neighborhood's buildings, the Financial District experienced a sustained building boom. During this period, ornate, six- to 12-story masonry-clad offices populated the Market Street corridor until it was built out, while industrial buildings relocated to the South Beach or South of Market area. A few skyscrapers were added during the late 1920s, but the area saw almost no new construction from the onset of the Depression until after World War II, when International Style office towers were steadily added. During this period, the Financial District also underwent extensive infrastructure projects, including the addition of the Embarcadero Freeway (1959) and the Bay Area Rapid Transit (BART) lines (1960s), and the Redevelopment Agency's Golden Gateway (1960s) and Yerba Buena Center (1960s–1980s) projects. Beginning in the 1980s, the formerly industrial South Beach area was redeveloped as a mixed-used neighborhood. In more recent decades, the Financial District has remained an important hub for business and commerce, even as the emergence of the technology industry has seen many companies relocate jobs to SoMa or Silicon Valley. Today, it remains the city's densest cluster of office and commercial buildings.</p>

Neighborhood	Built-Environment Summary
Glen Park	<p>Glen Park spans Bosworth Street to the south, San Jose Avenue to the east, 30th Street, Diamond Heights Boulevard, and Turquoise Way to the north, and O'Shaughnessy Boulevard to the west. Concentrated development began in the 1890s following the construction of an interurban electric streetcar line and increased following the 1906 earthquake and fire. Popular architectural styles at that time included Craftsman and vernacular cottages, and dwellings influenced by Queen Anne–style precedents. Another wave of residential development occurred with the introduction of Federal Housing Administration long-term mortgage loans in 1934. The neighborhood was built out by mid-century, with the exception of Diamond Heights where steep topography deterred development until a confluence of factors, including a housing shortage following World War II, a newly empowered Redevelopment Agency, and a court ruling that allowed undeveloped areas to be considered “blighted” because of economic disuse, cleared the way for redevelopment. Construction in Diamond Heights began in 1962 and was completed by 1983. The development featured mostly Midcentury Modern, Second Bay Tradition, Third Bay Tradition, and Brutalist homes. Beginning in 1973, service at the Glen Park station of the BART system connected the neighborhood to the rest of the region. Today, Glen Park remains a primarily residential area with a small commercial district along Diamond Street.</p>
Golden Gate Park	<p>Golden Gate Park is bound by Fulton Street to the north, Stanyan Street to the east, Lincoln Way to the south, and the Pacific Ocean to the west. Originally part of San Francisco’s western Outside Lands, the project of Golden Gate Park commenced in 1870. Inspired by New York City’s Central Park, the park sought to offer a leisure location and natural oasis to city residents. The first structure in the park, the Conservatory of Flowers, was constructed in 1879. Other important cultural attractions in the park such as the Japanese Tea Garden were revealed in the California Midwinter International Exhibition of 1894. After the 1906 earthquake and fire, Golden Gate Park served as a crucial shelter for hundreds of thousands of displaced residents and once the city recovered, it resumed its identity as a hub of nature and culture. Throughout the 20th century, Golden Gate Park saw the addition of the de Young Museum, the California Academy of Sciences, the Hall of Flowers, and the San Francisco Botanical Garden, among others. Many of these structures were constructed as New Deal projects throughout the 1930s, with the current de Young Museum and California Academy buildings added in the early 2000s.</p>
Haight Ashbury	<p>Haight Ashbury spans Steiner Street to the east, Oak Street to the north, Stanyan Street to the west, and Upper Terrace and Buena Vista Avenue to the south. The neighborhood’s development is closely tied with the development of Golden Gate Park. As the park began to take shape, real estate speculators and streetcar companies lobbied for the introduction of mass transit. The transit lines opened in the 1880s and touched off a sustained period of residential development in Haight Ashbury, which featured Stick/Eastlake and Queen Anne rowhouses, built primarily between 1890 and 1910. Originally, a larger area had been contemplated for Golden Gate Park but claims by land squatters resulted in a narrower boundary at the park’s eastern end, now known as the Panhandle. The neighborhood experienced another pulse of development following the 1906 earthquake and fire when many residents relocated to areas outside the burned districts. By 1910, Haight Ashbury had been mostly built out and remained relatively unchanged until the 1950s when middle- and upper-class families moved into newer housing in the western neighborhoods. An abundance of inexpensive housing was left in their wake, which was filled with young artists, students, hippies, and migrants. By the middle of the 1960s, Haight-Ashbury had become the center of the counterculture movement, culminating in the Summer of Love. Today, Haight-Ashbury is a residential neighborhood with access to Buena Vista Park, the Panhandle, and the Haight Street commercial corridor where local businesses continue to pay tribute to the neighborhood’s countercultural roots.</p>

Neighborhood	Built-Environment Summary
Hayes Valley	<p>Hayes Valley is bordered by Fulton Street to the north, Van Ness Avenue to the east, Market Street, Duboce Avenue, and Oak Street to the south, and Baker Street and Steiner Street to the west. The neighborhood was one of the first to develop in the broader Western Addition area after the 1855 Van Ness Ordinance. Colonel Thomas Hayes owned the primary tract in the area and sought to market the area to potential homeowners; after his efforts to construct a steam railroad line and, later, a horse-car line along Market Street, residential development took off in Hayes Valley in the 1860s. By 1869, the neighborhood's core was developed, and by the 1880s, a large commercial swath along Hayes between Laguna and Franklin arose. After the 1906 earthquake, much of the destroyed portion of the neighborhood was reconstructed with mixed-use buildings for newcomers. Most of the area was built out by the early 20th century. The remainder of the century saw the construction of the Central Freeway in the 1950s, which brought noise and pollution to the area, and its removal and replacement with a redesigned Octavia Boulevard in the 1990s. From its conception to now, Hayes Valley has served as a mixed-use area with residential, neighborhood commercial, and light industrial uses.</p>
Inner Richmond	<p>The Inner Richmond district lies between the Presidio to the north, Arguello Boulevard to the east, Fulton Street to the south, and Park Presidio Boulevard to the west. In the 1860s, the Clement Ordinance and Outside Lands Ordinance reserved land in the neighborhood for public parks, hospitals, cemeteries, and other civic needs. Golden Gate Park (1860s) and the Bay District Race Track (1874), were early developments; however, most of the land remained undeveloped prior to the turn of the century. In the late 1870s, streetcar lines connected the Inner Richmond to the downtown core; residential development soon arose in surrounding blocks. Development of the Inner Richmond increased at a feverish pace during the early 20th century, in large part due to the need for post-earthquake housing. Beginning in the interwar period, a large portion of San Francisco's Russian population relocated to the Richmond. Soon after, starting in the 1950s, many Chinese Americans relocated from Chinatown. With a large residential housing stock and convenient public transportation lines to Chinatown, the area became known as the "Second Chinatown." Throughout the 1970s and 1980s, the Inner Richmond welcomed a pan-Asian American/Pacific Islander community as well. Though the neighborhood was primarily built out by the 1920s, the increasing population of the neighborhood led to replacement of numerous single-family dwellings with larger multi-family properties—a process that has continued into the present. Today, the neighborhood is primarily residential, with neighborhood commercial districts and clusters on Geary Boulevard, Clement Street, California Street, and Balboa Street.</p>
Inner Sunset	<p>The Inner Sunset is bordered by Stanyan Street to the east, Lincoln Way to the north, 19th Avenue to the west, and Quintara Street and Clarendon Avenue to the south. Although the Inner Sunset was incorporated in the 1860s as part of the Outside Lands Ordinance, its rolling sand dunes were not platted until the 1890s. Residential development before the 1906 earthquake and fire was limited and largely contained to the neighborhood's northeast corner. Sporadic development continued following the earthquake when a mix of single-family and multi-family residences were constructed in various styles along the boundary with Golden Gate Park. At the time, the area was primarily Irish and Italian. The most robust period of residential construction occurred in the 1920s and 1930s when the newly constructed Duboce Tunnel improved access to downtown and the rise of private automobiles made the Inner Sunset a more attractive location for families. Tract developments soon filled out the neighborhood's remaining sections and the Inner Sunset approached build-out by 1940. When racial barriers to housing began to fall in the 1950s and 1960s, many Chinese immigrants and residents from Chinatown moved to the area where they remain in large numbers. The neighborhood experienced a final pulse of development in the 1970s when the Golden Gate Heights subdivision was constructed on the neighborhood's steepest slopes. Today, the Inner Sunset is a residential neighborhood that abuts Golden Gate Park and features a neighborhood-serving commercial district along Irving Street.</p>

Neighborhood	Built-Environment Summary
Japantown	<p>Japantown is bound by Sutter Street to the north, Gough Street to the east, Geary Boulevard to the south, and Baker Street to the west. It should be noted that these boundaries are different than those identified for the Japantown Cultural District. Though Japanese had begun to arrive in California in 1869, they did not settle in significant numbers in the area later known as Japantown until after the 1906 earthquake when Japanese enclaves in Chinatown and SoMa were destroyed. As the community settled, the presence of Japanese stores, personal services, and professionals grew, especially along Post, Buchanan, and Fillmore streets. By the 1930s, several dedicated structures, such as schools, churches, and cultural halls, were constructed and became fixtures of the neighborhood. After World War II and the forced internment of much of San Francisco's Japanese-American population, Japantown became more dispersed and ethnically mixed. Another change came to the neighborhood with the San Francisco Redevelopment Agency's clearance of the area in the 1950s and 1960s; from the 1960s to the 1980s, much of the heart of Japantown was reconstructed with Japanese culturally thematic designs and uses. The neighborhood was primarily built out by this period but still retained buildings from the early 20th century as well. Although most Japanese Americans no longer live within the boundaries of Japantown, it remains a culturally significant site and host to numerous cultural and educational events, such as the Cherry Blossom Festival. Today, Japantown is a mix of residential (mixed-use and medium-density) structures and neighborhood-serving commercial corridors within the Japantown complex and on Fillmore Street.</p>
Lakeshore	<p>Lakeshore is bound by Eucalyptus Drive, Lake Merced Boulevard, and Sloat Boulevard to the north, 19th Avenue to the east, the San Francisco/San Mateo county line to the south, and the Pacific Ocean to the west. Because of its remote location, the neighborhood saw little development prior to the 20th century. Originally envisioned as San Francisco's main reservoir, Lake Merced and the surrounding area was freed up for development only after the construction of Hetch Hetchy in 1908. Still, residential construction remained rare until the M-Oceanview streetcar connected the neighborhood to downtown in 1927. The most sustained period of development in Lakeshore occurred during the 1930s and 1940s, characterized by large subdivisions of detached single-family homes that were marketed to middle- and upper-class families. Beginning in 1939, San Francisco State University constructed a new campus on the eastern shores of Lake Merced. Parkmerced, San Francisco's first exclusively rental subdivision, was built between 1941 and 1951 to address a shortage of worker housing during and after World War II. Lakeshore acquired a major commercial center in 1952 with the introduction the Stonestown Mall. By the midcentury, the neighborhood was essentially built out and has remained relatively unchanged ever since. Today, Lakeshore features a mix of residential subdivisions, the Stonestown Mall, and popular recreation destinations, such as the San Francisco Zoo and Lake Merced.</p>
Lincoln Park	<p>Lincoln Park runs along the ocean to the north, the 32nd Avenue border of Sea Cliff to the east, Clement Street to the south, and the Outer Richmond to the west. From 1868 until 1909, the land now known as Lincoln Park was used as City Cemetery. In 1909, the Park Commission took over the land and dedicated it as Lincoln Park. Soon, in 1917, the golf course was expanded to an 18-hole facility. Also during this time, sections of the land were granted to the federal government for the adjacent Fort Miley Military Reservation. Another development came in 1923 with the construction of the Legion of Honor fine arts museum. Most recently, in 1984, artist George Segal designed the San Francisco Holocaust Memorial in the park. Today, Lincoln Park is zoned as public land and used primarily for recreational and cultural purposes.</p>

Neighborhood	Built-Environment Summary
Lone Mountain/USF	<p>Lone Mountain/USF spans Arguello Boulevard to the west, Geary Boulevard to the north, Baker Street to the east, and Fell Street to the south. The neighborhood was incorporated in 1856 but remained too far removed from built-up areas of the city to attract concentrated residential development. From the 1850s to the 1930s, the area was part of the Lone Mountain Cemetery complex, which consisted of four main cemeteries. As a result of transportation improvements beginning in the 1880s, some residential development occurred in the neighborhood's southern section along the border with the Panhandle. But the primary catalyst for development in Lone Mountain was the removal and relocation of most gravesites to Colma in the 1930s. The vacated cemetery made way for the construction of large institutional buildings, such as the San Francisco College for Women, which would later become part of the University of San Francisco (USF) campus. The remaining sections of the neighborhood, including Anza Vista, were built out in the 1950s and 1960s. Today Lone Mountain/USF is a mixed-use neighborhood that features residential enclaves, educational campuses, and medical facilities.</p>
Marina	<p>The Marina extends from the bay to the north, Van Ness Avenue to the east, Green Street and Vallejo Street to the south, and the Presidio to the west. In the 1860s, most of the Marina was either submerged beneath the bay or consisted of tidelands. In 1910, the land was acquired for the 1915 Panama-Pacific International Exposition (PPIE) and filled with sand and mud. Remaining PPIE buildings include the Yacht Harbor, the North Gardens (now Marina Green), and the Palace of Fine Arts. After the fair, property owners sought to create a high-class residential district, similar to St. Francis Wood. In 1922, the Marina Corporation was formed to develop 55 acres bounded by Fillmore, Scott, Chestnut, and Marina Boulevard. New houses, flats, and apartments were constructed in a variety of architectural styles, especially Mediterranean Revival and Classical Revival. Nearby public development included the Funston Playground (now called Moscone Recreation Center) and the Marina Junior High School (1937). During this time, portions of Chestnut Street evolved as the primary commercial corridor. By the late 1930s, the Marina was almost completely built out. During the mid-20th century, Lombard Street was developed with a large number of motels catering to auto tourists on their way to the Golden Gate Bridge. More recently, the Marina suffered severe damage during the 1989 Loma Prieta earthquake; liquefaction caused buildings to collapse and gas mains to burst. Today, the Marina is residential with commercial areas on Union, Fillmore, Chestnut, and Lombard streets.</p>
McLaren Park	<p>McLaren Park borders the neighborhoods of Visitacion Valley, the Excelsior, and Portola. Throughout the latter half of the 19th century, the area that is now McLaren Park was the subject of several unrealized subdivision schemes. In 1904, Daniel Burnham helped popularize the idea of using the land as a public park. His plan catalyzed a public campaign to bring more outdoor space to the city's southern neighborhoods, whose residents could not easily access Golden Gate Park. In 1926, the board of supervisors passed a resolution directing the purchase of a 550-acre park. When the bond resolution that would have funded the site's acquisition failed in 1928, the City instead acquired the parkland parcel by parcel over the next several decades, eventually reaching the park's present-day 318-acre footprint in 1958. Much of the park's infrastructure, trails, and tree plantings were established in the 1930s as part of the Works Progress Administration. The park experienced another pulse of development beginning in the late 1950s when new amenities were steadily added, including a swimming pool, amphitheater, and golf course. Today, McLaren Park remains one of the city's most popular outdoor spaces, attracting a mix of hikers, bikers, birders, naturalists, and families.</p>

Neighborhood	Built-Environment Summary
Mission	<p>The Mission District extends from Market Street, 11th Street, and Division Street to the north; Vermont Street and the James Lick Freeway (U.S. 101) to the east; Cesar Chavez Street to the south; and Dolores Street to the west. Throughout the late 18th century, the area was centered around Mission Dolores and existed as the center of Spanish proselytizing efforts and subjugation of the Native American community. It retained a pastoral identity until the late 19th century. During this time, Valencia Street, Mission Street, and the east side of 16th Street emerged as central commercial corridors, identities that they retain to this day. The 1906 earthquake and fire destroyed much of the neighborhood, excluding Mission Dolores; the Tanforan Cottages, two of the oldest residences in the city; and Dolores Park. Between 1907 and 1915, the majority of the neighborhood was rebuilt with low-rise, post-earthquake reconstruction-era flats and apartments. At the time, the neighborhood was associated primarily with Irish, German, and Polish residents. In the 1970s and 1980s, along with its rising punk nightlife scene, the area became known for its residents from Central and South America and soon became the city's nucleus of Latinx culture. More recently, the neighborhood has undergone a demographic shift with many new, younger people relocating there and sometimes displacing longtime residents. It is now a neighborhood with various uses, including residential areas, commercial corridors on Mission, Valencia, and 24th streets, transit-oriented districts, and production, distribution, and repair districts.</p>
Mission Bay	<p>Mission Bay is bounded by Townsend Street to the northwest, San Francisco Bay to the east, and 16th and 17th streets to the south. For much of its history, Mission Bay was a shallow inlet and marsh. Beginning in the 1850s, settlers began to use the area for shipbuilding, repairs, and clam and oyster collection. From 1860 to 1910, infill occurred and increased the amount of developable land in the area. Until the late 20th century, Mission Bay was primarily industrial, with warehouses, shipyards, slaughterhouses, factories, foundries, and tracks. In the late 1990s, the city devised the Mission Bay Project, which sought to convert the area into a planned community. The area soon welcomed the University of California, San Francisco Mission Bay campus as well as luxury apartment buildings and the Chase Center basketball stadium. Although some pier-related structures remain from the early 1900s, many properties in the area date to the first decade of the 21st century. Development is ongoing, and the neighborhood is still zoned as the Mission Bay Redevelopment Area.</p>
Nob Hill	<p>Nob Hill spans from Clay Street and Green Street to the north, Mason Street and Powell Street to the east, Post Street to the south, and Leavenworth Street and Van Ness Avenue to the west. Residential development commenced in Nob Hill in 1853 and increased throughout the late 19th century with the construction of the Clay Street cable car line. In its initial days, the neighborhood was primarily home to the extravagant residences of mining and railroad magnates. Much of the neighborhood was destroyed in the 1906 earthquake and fire. During reconstruction, a number of luxury apartment buildings were constructed in the upper portions of the neighborhood, including a cluster of Beaux Arts buildings on Sacramento Street. At the same time, portions of Lower Nob Hill were built up with three- to seven-story multi-unit residential buildings and hotels. Many of these structures now make up the historically intact Lower Nob Hill Apartment Hotel National Register District. Along with apartments, the neighborhood is well known for its collection of hotels, including the Fairmont and Mark Hopkins, as well as Huntington Park. Nob Hill shares a border with nearby Chinatown; there is overlap between the two neighborhoods. Nob Hill has a Chinese-American presence, and key institutions, such as the Chinatown Library, remain on the border of the two. The neighborhood was primarily built out by the 1920s. Today, it remains residential in character, with commercial areas on Polk Street (frequented by the LGBTQ community in the 1960s through 1970s), California Street, Larkin Street, Hyde Street, and Pacific Avenue.</p>

Neighborhood	Built-Environment Summary
Noe Valley	<p>Noe Valley is bound by 21st Street to the north, Market Street and Diamond Heights Boulevard to the west, 30th Street to the south, and Dolores Street to the east. The neighborhood’s street grid was platted beginning in 1853 when John Horner purchased the land with the intention to create a residential suburb. However, the area remained too far removed from developed portions of the city to attract much interest. New horse carriage routes in the 1860s enabled limited residential construction at the eastern edge of the neighborhood, but the primary catalyst for the development of Noe Valley was the construction of new streetcar lines in the 1880s. By the mid-1890s, Noe Valley was rapidly developing as a streetcar suburb, with rows of semi-identical Queen Anne–style cottages, many constructed by merchant builders such as Fernando Nelson, Jonathon Anderson, and Joseph Comerford. These small, affordable cottages were designed for the neighborhood’s working-class residents, who were primarily Irish, German, Scandinavian, Italian, and Russian immigrants. Noe Valley was relatively undamaged by the 1906 earthquake; the neighborhood escaped the fires that consumed much of the city. With its infrastructure intact, many displaced residents moved into the area, and Noe Valley experienced another surge of growth. Flats and multi-family dwellings became more common during this time. Noe Valley experienced gradual infill in the year prior to World War II. The neighborhood’s southwestern hills remained mostly undeveloped until midcentury street improvements paved the way for a final pulse of development. By the 1970s, the neighborhood was built out. Today, Noe Valley is most residential with neighborhood serving commercial corridors along 24th Street and Church Street.</p>
North Beach	<p>North Beach spans from Pacific Avenue to the south, Sansome Street to the east, the San Francisco Bay to the north, and Columbus Avenue to the west. Originally known as the “Latin Quarter,” North Beach was home to a variety of European and Latin American ethnic groups in the 1850s. The working-class community, which labored along the industrial waterfront and quarried on Telegraph Hill, was relatively isolated from the rest of the city until street grading and the construction of Montgomery Avenue (now Columbus Avenue) in the 1860s allowed for more direct access to downtown. Connectivity continued to improve with the introduction of cable car lines in the 1880s. By 1886, the neighborhood was essentially built out but continued to densify over the next 20 years as flats replaced some smaller residences. The 1906 earthquake leveled the neighborhood, but residents began rebuilding just days after the disaster. North Beach recovered faster than any other neighborhood in the city. It was during this reconstruction period that North Beach took on its primarily Italian character. Although the area was fully rebuilt by 1915, some additional residential development occurred in the 1920s farther up Telegraph Hill, capped by Coit Tower in 1933. The neighborhood remained relatively unchanged until after World War II when many Italians moved to the Excelsior or the suburbs. As Italians left North Beach, new residents of Chinese ancestry as well as members of the LGBTQ community and Beat generation moved in. Beginning in the 1970s, the neighborhood’s rising property values and the reemergence of the Financial District transformed North Beach into a white-collar community. Today, North Beach is a mixed-use neighborhood with residential sections bounded by commercial districts along Columbus Avenue and the waterfront. The neighborhood remains a magnet for Italian American tourism and retains the city’s largest concentration of pre-1870s structures on Telegraph Hill.</p>

Neighborhood	Built-Environment Summary
Ocean View/Merced/Ingleside	<p>The Ocean View/Merced/Ingleside neighborhood reaches from Ocean Avenue and Holloway Avenue to the north, the John F. Foran Freeway (Interstate 280) to the east and south, and Junipero Serra Boulevard to the west. The area was originally a ground for cattle grazing. The closest transportation route in the area was the San Jose Road (today's San Jose Avenue). The opening of the San Francisco and San Jose Railroad in 1864 catalyzed the development of the neighborhood, spurring the creation of several homestead associations which subdivided land near the new line. Throughout the 1870s, a cluster of buildings, including saloons, roadhouses, and lodging houses developed around the Ocean View station. Despite these developments, by the turn of the century, the area still remained relatively remote. More sustained residential development of the area followed the 1906 earthquake and fire. An added attraction during this time was Balboa Park, created in 1908. Then, in 1910, the former Ingleside Racetrack land was redeveloped as a residence park, designed in accordance with "City Beautiful" principals. The neighborhood experienced an even larger pulse of development—both residential and commercial—during the 1920s; by this point, most of the Ingleside portion of the neighborhood was built out. Access to the neighborhood also improved during this period with the M-Ocean View line. More infill occurred in the years before and after World War II, and by the 1950s, the final build-out was primarily complete. Initially populated by German, Swiss, and Italian blue-collar laborers, during the 1950s, middle-income African-American residents began moving to the area south of Ocean Avenue, which did not have restrictive racial covenants. Today, Ocean View/Merced/Ingleside is primarily residential, with commercial pockets on Ocean Avenue, 19th Avenue, Capitol Avenue, Plymouth Avenue, Holloway Avenue, and Randolph Street.</p>
Outer Mission	<p>The Outer Mission is bound by Mission Street to the east, Saint Mary's Avenue to the north, Interstate 280 to the west, and the San Francisco/San Mateo county line to the south. Construction of a railway line in 1864, today's Interstate 280 alignment, allowed agriculture to flourish in the Outer Mission, which was originally used for grazing, and connected Italian, Swiss, and German farmers to downtown markets. Other development remained rare until the 20th century, except for the 1859 construction of a large juvenile detention facility (now the site of City College). Following the 1906 earthquake and fire, worker housing was constructed at the northernmost section of the neighborhood, near the intersection of Mission Street and Geneva Avenue. Balboa Park, built in 1908, attracted additional new residents, initiating a steady wave of residential development that would continue over the next several decades, most often in Craftsman or Period Revival styles. By the onset of World War II, the neighborhood was essentially built out and remained relatively unchanged for several decades, until an influx of Asian and Latinx residents transformed the demographics of the area. Today, the Outer Mission is a residential neighborhood but mixed with commercial districts along Mission Street, Geneva Avenue, and Ocean Avenue.</p>

Neighborhood	Built-Environment Summary
Outer Richmond	<p>The Outer Richmond is bound by Fulton Street to the south, Park Presidio Boulevard to the east, Lake and Clement streets to the north, and the Pacific Ocean to the west. Originally used for grazing, the Outer Richmond experienced limited commercial development beginning in 1863 when Point Lobos Road (today's Geary Boulevard) connected downtown San Francisco to recreational destinations, such as the Cliff House. Along the thoroughfare, racetracks, restaurants, and saloons replaced ranches and catered to weekend travelers on their way to the ocean. Although there was some residential building between 20th and 26th avenues in the 1880s, most land remained undeveloped until the turn of the century. The most sustained period of construction in the Outer Richmond occurred following the 1906 earthquake when thousands of displaced residents (primarily Irish, German, and Jewish descent) relocated. During this period, merchant builders purchased large parcels of land and constructed residences that featured similar floor plans and architectural detailing. By 1930, the neighborhood was essentially built out and remained relatively unchanged until the 1960s when Chinese and Russian communities began migrating to the area. Today, the Outer Richmond is a residential neighborhood with commercial clusters along Geary Boulevard, Clement Street, and Balboa Street.</p>
Pacific Heights	<p>Pacific Heights spans Sutter Street to the south, Van Ness Avenue to the east, Green and Vallejo streets to the north, and Lyon Street to the west. The street grid for Pacific Heights was first platted during the 1850s as a result of the Van Ness Ordinance, but the primary catalyst for the development of Pacific Heights was the construction of cable car lines that connected the area to the rest of the city. By 1877, the eastern portion of Pacific Heights was within easy commuting distance of downtown, and by the 1890s the entire neighborhood was well-served by public transit. The development pattern in Pacific Heights during the late 19th and early 20th centuries was characterized by the construction of large, detached residences with ample front and side setbacks. The neighborhood largely escaped damage during the 1906 earthquake and fire and soon experienced a punctuated period of infill. Pacific Heights underwent another significant period of growth during the 1920s, when the advent of private automobiles facilitated the development of areas further away from streetcar lines. By 1930, the area was essentially built out; however, during World War II, many of the large, surviving Gilded Age rowhouses in Pacific Heights were subdivided into boarding houses to accommodate a huge influx of war workers. Today, Pacific Heights remains one of the most prestigious residential neighborhoods in the city, showcasing a mix of large apartment buildings and elegant single-family dwellings, with the neighborhood-serving commercial corridor along Filmore Street.</p>
Portola	<p>Portola spans Ward Street to the south, U.S. 101 to the east, Interstate 280 to the north, and Maclaren Park to the west. Initially a hub for vegetable farming and flower nurseries, the neighborhood experienced little development beyond farmhouses prior to the 1906 earthquake. A university college campus site was planned for the Portola area in the late 1800s, inspiring the streets to be named after prestigious colleges and universities. Spurred by the 1906 earthquake and sustained by the San Bruno Avenue streetcar line, residential development exploded in the area during the early 20th century. A large community of Russian Orthodox Jews relocated from South of Market neighborhood to Portola, which became known as "Little Jerusalem." The real estate boom continued throughout the 1910s and 1920s. By the Great Depression, the neighborhood had reached build-out, though a significant portion of Portola remained dedicated to agricultural uses. Following World War II, the neighborhood experienced a series of demographic shifts. Portola's Jewish community had dispersed by the 1950s, but the neighborhood soon attracted new residents: the Latinx and Ukrainian communities beginning in the 1960s, the African American community beginning in the 1970s, and the Chinese and Filipino communities beginning in the 1980s. Meanwhile, tract housing gradually replaced farms and greenhouses from the 1950s through the 1980s. Today, Portola is a residential community oriented around the San Bruno Avenue commercial corridor.</p>

Neighborhood	Built-Environment Summary
Potrero Hill	<p>Potrero Hill spans 17th Street to the north, U.S. 101 to the west, 26th Street to the south, and the San Francisco Bay to the east. Beginning in the 1860s, manufacturing companies gravitated to Potrero Hill's deep-water access and remote location. The neighborhood experienced its first sustained wave of development in 1867 when a wooden causeway known as "Long Bridge" (today's Third Street) connected Potrero Point to the South of Market area, catalyzing the construction of factories, ports, and worker housing in Dogpatch, which retains the largest concentration of Gilded Age-era worker housing in San Francisco. Meanwhile, large-scale earthmoving projects removed the eastern part of Potrero Hill that infilled nearby marshland and paved the way for further development. By the end of the 19th century, as land became limited along the waterfront, the neighborhood's working-class community (originally ethnically Irish and German but later increasingly Italian, Latinx, Scandinavian, Russian, and Japanese) settled on the slopes of Potrero Hill, creating a distinct residential section to the west. Most of these homes were built between 1895 and 1925 in the Italianate, Stick/Eastlake, or Queen Anne style and remain standing today. Potrero Hill grew for several reasons until reaching build-out in 1930. It avoided extensive damage during the 1906 earthquake, shared a boundary with the rapidly expanding Mission District, and thrived economically during World War I when ships and metal were in high demand. When its maritime economy faltered after World War II, numerous factories and homes were demolished to make way for trucking routes and new auto-oriented businesses. In more recent decades, the construction of live-work spaces has helped redefine Potrero Hill as a center for technology and innovation. Today, it remains a mixed-use neighborhood, with industrial facilities clustered along the eastern waterfront, residential areas to the west, and small neighborhood-serving commercial corridors along Third, 18th, and 20th streets.</p>
Presidio	<p>The Presidio is bound by Lyon Street to the east, West Pacific Avenue and Lake Street to the south, and San Francisco Bay to the north and west. The area was an important U.S. military base, beginning in 1847. During the gold rush era, the Army repurposed many buildings from the previous Spanish fort. Wood construction began to gradually replace the older adobe buildings, especially during the Civil War period. Following the war, a new road and entrance system was established, which is still used today. At the end of the 19th century, the Presidio was part of an extensive tree-planting initiative, transforming grassy hillsides into the dark eucalyptus forest seen today. The Presidio's most intense period of development occurred between the 1890s and the outbreak of World War I. During this time, the base's capacity increased fourfold as new barracks, a hospital, and training rooms were built in the Colonial Revival and Spanish Colonial Revival styles. Concrete, stucco, and brick were favored over wood, which established the unique architectural character seen today. The construction of the Golden Gate Bridge in the 1930s heavily affected the Presidio, requiring the demolition of many buildings to make way for new roadways and a toll plaza. An additional flurry of development occurred during World War II when wood-framed structures with minimal detailing were erected to expand capacity quickly. The Presidio remained relatively unchanged until it was decommissioned in 1994. Today, the Presidio is managed by the National Park Service and is one of San Francisco's most popular recreation destinations.</p>

Neighborhood	Built-Environment Summary
Presidio Heights	<p>Presidio Heights is bound by Geary Boulevard to the south, Arguello Boulevard to the west, West Pacific Avenue to the north, and Baker and Lyon streets to the east. For several decades following the Gold Rush, the area that comprises present-day Presidio Heights featured several large cemeteries and remained far removed from the more populous areas of the city. The primary catalyst for the sustained development of Presidio Heights was the installation of new transportation lines, beginning in 1879, which reduced travel times between the western portion of the city and downtown. By 1895, area residents had formed a neighborhood association to advocate for street paving and other infrastructure improvements. Minimal damage during the 1906 earthquake and fire made the neighborhood an attractive destination for residents seeking new housing, especially upper-class San Franciscans who wanted to settle near the already-wealthy Pacific Heights. Presidio Heights boasts many architect-designed, detached single-family homes, most constructed between 1905 and 1925, including large number of First Bay Area Style, Arts & Crafts, Classical Revival, Colonial Revival, Tudor Revival, French Provincial, and Mediterranean Revival designs. By the 1930s, most parcels in Presidio Heights had been built out, although the removal of the Laurel Heights cemetery in 1941 allowed for a final burst of infill development. Today, Presidio Heights remains a residential area with a small neighborhood-serving commercial corridor along Sacramento Street.</p>
Russian Hill	<p>Russian Hill spans from the bay to the north, Columbus Avenue and Leavenworth Street to the east, Clay Street to the south, and Van Ness Avenue to the west. The northwestern corner of Russian Hill developed very slowly during the 1850s and 1860s. At this time, most residences were modest dwellings occupied by blue-collar families. Most residents were natives of English-speaking countries, namely the United States, England, Ireland, Canada, and Australia. In the 1870s and 1880s, public transportation developments, such as a branch of the Clay Street Hill Railroad and the Presidio and Ferries Railroad, spurred further residential development. Soon, Lombard, Greenwich, and Polk streets were graded. Most of Russian Hill burned in the 1906 earthquake and fire; during reconstruction, the neighborhood saw a drastic increase in white-collar residents. This period of redevelopment stalled in the 1920s, and few buildings have been constructed since. Today, Russian Hill is residential (single-family and multi-family homes), with commercial areas on Hyde, Polk, Powell, and Stockton streets and surrounding Ghirardelli Square and Aquatic Park.</p>
Sea Cliff	<p>Sea Cliff extends from the ocean to the north, the Presidio to the east, Lake Street and California Street to the south, and Lincoln Park to the west. Sea Cliff was originally part of the Baker tract. In 1908, a number of Craftsman, Shingle, and Classical Revival style houses were erected along 32nd Avenue, north of California Street. Large-scale residential development followed, with plans for Sea Cliff to become a residence park in 1912. Many of the houses in the area were designed by architect Earle Bertz. Sea Cliff was popular because of its proximity to public transportation and the Golden Gate as well as its panoramic views. Development continued throughout the 20th century, and in 1951, the intersection of Sea Cliff Avenue and El Camino Del Mar was altered to grade an access road to China Beach where a public beach house was constructed. Most structures in Sea Cliff were constructed by the late 1920s, with a small number following in the 1940s and 1950s. Today, Sea Cliff remains an almost entirely residential neighborhood.</p>

Neighborhood	Built-Environment Summary
SoMa	<p>SoMa is bound by Market Street to the north, Third Street to the east, Townsend Street to the south, and 11th Street to the west. When the Gold Rush commenced in 1849, the majority of SoMa was tidal wetlands. Throughout the 1850s and 1860s, the area was graded and filled and surrounding sand dunes were leveled. The downtown portion of SoMa also remained initially undeveloped, despite its proximity to Portsmouth Square, the then-center of commercial and political activity. In the mid-19th century, development began, and the first department store opened in 1892. Also in the mid-19th century, SoMa arose as the city's primary industrial district, with pioneering foundries such as Union Iron Works and Pacific Iron Works. Warehouse construction in the area boomed. The completion of the Transcontinental Railroad in 1869 spurred an immigration wave and soon, Irish immigrants made up around half of SoMa's residents. Along with other European ethnic groups, African Americans lived in SoMa, especially around Minna, Natoma, and Tehama streets. With this influx of residents, boarding and lodging houses—many constructed during post-quake reconstruction and still extant today—emerged alongside industrial and warehouse facilities. In the years leading up to World War II, large numbers of Filipino residents settled in SoMa. Throughout the 20th century, Catholic churches initially frequented by Irish residents soon saw increasingly Filipino congregations. Although most of SoMa was built out by the mid-1930s, parts are still undergoing development. Today, it is a neighborhood with varied uses, including service, offices, redevelopment, mixed-use, industrial, commercial, residential, and production, distribution, and repair.</p>
Sunset/Parkside	<p>The Sunset/Parkside neighborhood extends from Lincoln Way to the north, 19th Avenue to the east, Sloat Boulevard and Lake Merced Boulevard to the south, and the ocean to the west. The neighborhood was the first permanent settlement in the western reaches of San Francisco. In 1883, a steam railway line was implemented along H Street (now Lincoln Way). Residential development followed in 1895 with the creation of Carville, a community of surplus cable cars and horse cars; it grew especially popular after the 1906 earthquake and fire. The primary catalyst for residential development and infrastructural improvement in the Parkside area was the formation of the Parkside Realty Company in 1905; however, the area remained sparsely settled throughout most of the 1910s. Besides these small developments, Sunset/Parkside remained relatively undeveloped until the 1920s, shortly after the completion of the Twin Peaks Tunnel. In time, the presence of the L-Taraval encouraged the development of a commercial strip along Taraval Street. From the 1920s through the 1950s, residential development in the area swiftly increased and the Sunset portion was primarily built out by the late 1940s. During this wave, merchant builders like Ray Galli, Henry Doelger, and the Lang Realty company developed the area in a range of styles, including Colonial Revival, Regency, and French Provincial. The final build-out of the Parkside portion followed in the 1960s. Originally inhabited by Russian, Irish, and Italian residents, the Sunset/Parkside became known as the “third Chinatown” as many Chinese Americans relocated from Chinatown between the 1960s and the 1980s. Today, the neighborhood is largely residential, with neighborhood commercial districts on Judah, Irving, Noriega, Taraval, and Vicente streets as well as Sloat Boulevard.</p>

Neighborhood	Built-Environment Summary
Tenderloin	<p>The Tenderloin spans from Post Street to the north, Powell Street to the east, Market Street to the south, and Van Ness Street to the west. The Tenderloin is a solidly mixed-use neighborhood, with multi-family apartment buildings, single-residency occupancy hotels, as well as restaurants, entertainment venues, and stores. By the beginning of the 20th century, the neighborhood was known as a prosperous hub with many entertainment venues, including theater and opera houses. The neighborhood was largely destroyed in the 1906 earthquake and fire but was shortly rebuilt with hotels and apartment buildings that remain extant; the majority of the Tenderloin was built out by the 1920s. The National Register-listed Uptown Tenderloin Historic District exhibits the largely intact, visually consistent high-density residential architecture of this era. In the 1960s, the Tenderloin was a hub of LGBTQ activism, including the Compton's Cafeteria Riot. Today, the Tenderloin is a high-density residential and commercial neighborhood and home to primarily Southeast Asian, African American, Latinx, Russian, Middle Eastern-North African, and Filipino residents.</p>
Treasure Island	<p>Treasure Island and Yerba Buena Island lie in the San Francisco Bay along the path of the Bay Bridge. Yerba Buena Island was subject to conflicting land claims until 1867 when the U.S. Army sent a small garrison of soldiers to establish a post on the island. The Army built several structures, including a lighthouse, but never housed more than 200 soldiers. When the Navy took control of the island in the 1890s, it undertook major grading work, enlarged the saddle of the island, and established barracks and service buildings for approximately 500 soldiers. World War I kicked off a period of intense development; by 1920, the island was home to almost 1,500 people. Use of Yerba Buena Island began to decline in 1922 when the Navy relocated most of its training exercises to San Diego. Beginning in 1936, Treasure Island was artificially constructed on the shallow shoals north of Yerba Buena Island, and in 1939, it was used as the site of the Golden Gate International Exposition. Following the expo, the island became a naval training ground and distribution center, with former exhibition structures retrofitted to accommodate the armed forces. The island continued to be used by the military until it was decommissioned in 1997. Today, the island is being redeveloped as a mixed-use neighborhood that will include thousands of dwelling units.</p>
Twin Peaks	<p>Twin Peaks is bound by Clarendon Avenue to the north and west, Twin Peaks Boulevard and 19th Street to the north, Grand View Avenue and Portola Drive to the east and south, Woodside Avenue to the south, and Laguna Honda Boulevard to the west. The Twin Peaks neighborhood refers to the primarily residential zone surrounding two of the city's highest peaks, Eureka and Noe. The area was very likely initially used as a hunting and lookout zone by Native American people. In the 1940s through 1960s, engineering advancements allowed development on the steeply sloped land. Notable Midcentury Modern, International Style, and Second Bay Tradition buildings can be found along the slopes of Twin Peaks. Midtown Terrace, developed by the Standard Building Company and the Panorama Development Company in 1956–1957, features Midcentury split-level designs. Large apartment buildings were also constructed in the area from 1935 to 1970 in primarily Streamline Moderne and Midcentury Modern styles. Other notable development in the area includes the Twin Peaks School, constructed in 1953. The neighborhood was primarily built out by the 1950s and 1960s. Today, it is largely residential (single-family and multi-family homes), with few businesses or recent development.</p>

Neighborhood	Built-Environment Summary
Visitacion Valley	<p>Visitacion Valley lies in the southern quadrant of San Francisco, extending from Bayshore Boulevard to the east, the city boundary to the south, and McLaren Park to the northwest. After Spanish occupation, it was used for agriculture and grazing purposes. Some of the earliest inhabitants included European immigrants cultivating the land; Italians were a large part of this group. The neighborhood remained rural until the late 19th century when a number of industries, such as silk, coal, and fertilizer businesses, moved in. After the 1906 earthquake and fire, the neighborhood experienced a slowly increasing residential population. The introduction of two streetcar lines in 1910 further paved the way for residential development, and in the 1930s, the first single-family houses were built, mimicking the modest stucco structures in the Sunset District. Over the next 15 years, the neighborhood experienced increasing residential and infrastructural development as well as the birth of a commercial corridor at Leland Avenue. From the 1940s through 1960s, Visitacion Valley was the site of a number of San Francisco Housing Authority initiatives such as the Geneva Towers (not extant), designed to house war workers. Little development has occurred since, and the area was overlooked by the building boom of the 1990s. Today, Visitacion Valley remains a low-density residential area home to a largely Asian American population, with commercial corridors on Bayshore Boulevard and Leland Avenue, a shopping center, and some production, distribution, and repair sites.</p>
West of Twin Peaks	<p>West of Twin Peaks is bound by Holloway and Ocean Avenues to the south, 19th Avenue to the west, Quintara Street to the north, and Woodside Avenue, O’Shaughnessy Boulevard, and Interstate 280 to the east. The neighborhood was mostly uninhabited and used as grazeland prior to the 20th century. In 1881, mining engineer Adolph Sutro purchased a substantial portion of the area and initiated a large-scale tree planting project stretching north from Ocean Avenue across Mount Davidson to the Inner Sunset, which became known as “Sutro Forest.” The single greatest catalyst for development in the neighborhood was the opening of the Municipal Railroad’s Twin Peaks Tunnel in 1918, which dramatically improved commute times between the western part of the city and downtown. In anticipation of the tunnel’s opening, development of several residence parks, including St. Francis Wood, West Portal, Westwood Park, and Forest Hill, began in the 1910s. These planned subdivisions were marked by wide, curving boulevards, minimum building setbacks, buried utilities, as well as ornamental landscaping and other amenities designed to attract relatively affluent home buyers. Restrictions mandated only single-family residences, and many houses were designed by architects in the employ of development companies. Although some developments, such as Westwood Park, were dominated by bungalow designs, most of the residential parks were built out in Period Revival styles, including Mediterranean Revival, Tudor Revival, Colonial Revival, and French Provincial designs. Residential construction continued until the neighborhood was essentially built out by the 1960s. Today, West of Twin Peaks is a residential neighborhood, with small, neighborhood-serving commercial corridors along West Portal Avenue and Ocean Avenue.</p>

Neighborhood	Built-Environment Summary
Western Addition	<p>The Western Addition spans from Geary Boulevard and California Street to the north, Van Ness Avenue and Gough Street to the east, Fulton Street to the south, and Baker Street and St. Joseph Avenue to the west. The neighborhood was created in 1856 through the Van Ness Ordinance as the first major platted expansion to San Francisco’s original city grid. The introduction of mass transit in the 1880s spurred a sustained period of development, and by the turn of the century most streets were lined with Gilded Age rowhouses, flats, and single-family residences. A new wave of development came after the 1906 earthquake and fire. Also during this time, the city’s first and largest “auto row” developed along Van Ness Avenue and intersecting cross streets. During World War II, large numbers of African Americans moved into Western Addition into dwellings formerly occupied by Japanese residents, who had been forced into internment camps. The neighborhood emerged as a focal point of African American life in the city. Concurrently, however, a substantial portion of the neighborhood was targeted for redevelopment by the Redevelopment Agency—resulting in the clearance of dozens of blocks during the 1960s and the insertion of Geary Boulevard as an arterial corridor. Since the Redevelopment era, which saw build-out of the neighborhood, the area has experienced the addition of Westside Courts public housing, along with a renewed interest in the Fillmore Street commercial corridor and the neighborhood’s historic jazz music scene. Today, the Western Addition neighborhood is a mix of residential (single-family and high-density) construction and numerous neighborhood-serving commercial corridors, including Fillmore Street, Divisadero Street, and Geary Boulevard.</p>

Table F-3. Historic Context Statements Addressing Social History and Cultural Heritage

Context Name	Year Adopted	Thematic Scope and/or Geographic Extent	Time Period	Evaluative Frameworks
Sexing the City: The Development of Sexual Identity-Based Subcultures in San Francisco, 1933–1979	2004	Presents information on sexual and gender minority social history in San Francisco during the mid-20 th century—specifically, queer community life, political organizing, and social institutions.	1933–1979	Promotes the consideration of queer identity formation and political mobilization during the resource evaluation process; proposes potentially significant individual properties and four historic districts associated with queer social history.
Japantown Historic Context Statement	2009	Describes significant ethnic and cultural themes in the development of San Francisco’s Japanese and Japanese-American communities in the Western Addition, including late 19 th - and early 20 th -century community formation, World War II internment, postwar return, and urban redevelopment.	1880s–present	Provides guidance for evaluating the significance and integrity of various property types associated with San Francisco’s Japanese and Japanese-American communities, such as residential, commercial, and religious properties; integrity guidance stresses feeling and association as the most important aspects when considering properties with cultural and ethnic heritage significance.
Filipino Heritage Addendum to the South of Market Historic Context Statement	2013	Expands upon the general neighborhood development history presented in the South of Market Historic Context Statement by describing Filipino immigration and settlement patterns, social/cultural institutions, and community formation in the SoMa district, primarily after World War II.	1910–2013	Does not present specific registration requirements but does provide information to inform future evaluations of resources associated with Filipino social and cultural heritage.

Context Name	Year Adopted	Thematic Scope and/or Geographic Extent	Time Period	Evaluative Frameworks
Citywide Historic Context Statement for LGBTQ History in San Francisco	2016	Describes the historical experiences of San Francisco's LGBTQ communities, covering thematic areas such as identity and community formation, policing, civil rights and protest, and health and medicine.	19 th century through late 20 th century	Presents evaluative frameworks for each thematic area the context statement covers. The evaluative frameworks provide examples of potentially eligible properties that may meet the requirements of Criteria A/1, B/2, C/3, and D/4. Furthermore, the historic context statement presents special considerations for the assessment of integrity for LGBTQ-associated resources.
Draft Chinese-American Historic Context Statement	In progress	Provides an overview of historical themes related to Chinese-American migration, discrimination, neighborhood and community development, religion/spirituality, and political mobilization in San Francisco.	1840s–1980s	Establishes significance thresholds and integrity considerations specific to 10 context themes within San Francisco's Chinese-American social history.
Draft African American Citywide Historic Context Statement	In progress	Presents historic themes associated with San Francisco's African American community members and social institutions, including early settlement patterns, economic and social life, churches, nightlife, World War II mobilization, the Civil Rights movement, and postwar redevelopment and displacement.	Early 19 th century to 2014	Describes themes with the greatest likelihood to imbue significance upon a property associated with African American history and proposes guidelines for assessing integrity.

Context Name	Year Adopted	Thematic Scope and/or Geographic Extent	Time Period	Evaluative Frameworks
Draft Nuestra Historia: San Francisco Latino Citywide Historic Context Statement, Documenting Chicano, Latino, and Indígena Contributions to the Development of San Francisco	In progress	Includes a historical overview of Latin American descent populations in San Francisco, from the early indigenous era to the present, as well as thematic chapters on Latinx business and commerce, political and social organizations, religion and spirituality, newspapers and media, visual and performing arts, and LGBTQ spaces. It also offers evaluative frameworks for each theme and general preservation recommendations.	Early indigenous history to present	Describes important themes, significance thresholds, and integrity considerations. Provides examples of potentially eligible properties that may meet the requirements of Criteria A/1, B/2, C/3, or D/4.
Draft Counterculture National Register Multiple Property Documentation Form	In progress	Addresses resources associated with San Francisco counterculture movements citywide.	1965–1975	Provides examples of properties that may meet the requirements of Criteria A/1, B/2, and C/3; also provides guidance on evaluating association and integrity, given that many properties with counterculture associations have had multiple owners, tenants, and uses over time and associations to counterculture history may have been short lived.

Context Name	Year Adopted	Thematic Scope and/or Geographic Extent	Time Period	Evaluative Frameworks
Draft Women's Rights Historic Context Statement	In progress	Addresses properties citywide associated with successive women's rights contexts and themes: Women's Suffrage (1894–1911); Women in the Workplace (1900–1979); Women Providing Services to Recently Arrived Young Women (1874–1938); Civil Rights, Early Lesbian, and Trans Women Organizing and Self-Determination Struggles (1956–1971); Women's Movement, Second Wave Feminism, and the Sex Wars (1973–1989); Women of Color and Neighborhood Organizing (1970–1986); and Women on the Frontline of AIDS (1982–1995).	1896–1992	Provides examples of properties associated with the document's themes that may meet registration requirements, primarily Criteria A/1 and B/2. The draft notes few examples will meet the requirements of Criteria C/3.
American Indian Historic Context Statement	In progress	Resources associated with American Indian history and communities citywide.	Still to be developed.	Context statement content still to be developed in consultation with Native American representatives.

Source: Grant Din, Alvin Lin, Eric Mar, Willian Tran, Palma You, and ICF, *San Francisco Chinese American Historic Context Statement*, prepared for the City and County of San Francisco, San Francisco, CA, 2021; Donna Graves and Page & Turnbull, *Historic Context: Japantown, San Francisco, California*, revised, prepared for the City and County of San Francisco Planning Department, San Francisco, CA, 2011; Donna J. Graves and Shayne E. Watson, *Citywide Historic Context Statement for LGBTQ History in San Francisco*, prepared for the City and County of San Francisco, San Francisco, CA, 2016; Page & Turnbull, *San Francisco Filipino Heritage Addendum to the South of Market Historic Context Statement*, prepared for the San Francisco Planning Department, San Francisco, CA, 2013; San Francisco Planning Department, *Historic Context Summaries*, draft, October 2021; Damon Scott, *Sexing the City: The Development of Sexual Identity Based Subcultures in San Francisco, 1933- 1979*, prepared for the Friends of 1800, San Francisco, CA, 2004; Tim Kelley Consulting, *The Alfred Williams Consultancy*, VerPlanck Historic Preservation Consulting, and San Francisco Planning Department, *African American Citywide Historic Context Statement*, prepared for the City and County of San Francisco, San Francisco, CA, 2016.

Table F-4. Established Cultural Districts

Name	Year Established	Location	Thematic Scope
Japantown Cultural District	2013	Contains 36 blocks in the Western Addition neighborhood, bounded by California Street, Gough Street, O'Farrell Street, and Steiner Street.	Recognizes the long presence of Japanese-American community members in the Western Addition and their continued strong connections to the neighborhood for cultural identity; it remains one of the last Japantowns in the United States.
Calle 24 Latino Cultural District	2014	Aligns primarily with parts of the Mission District. Its boundaries include 22 nd Street to the north, Potrero Street to the east, Cesar Chavez Street to the south, and Mission Street to the west. It also includes La Raza Park (also called Potrero del Sol) and Precita Park.	Represents the area with the largest concentration of Latinx-owned and operated businesses, arts and cultural organizations, community institutions, cultural landmarks, and festivals/routes in San Francisco. It also has a high Latinx residential population, one of the largest since the mid-20 th century.
SoMa Pilipinas – Filipino Cultural Heritage District	2016	Aligns with a large portion of the SoMa neighborhood, bounded by Market Street, Second Street, Brannan Street, and 11 th Street.	Represents the community of individuals with Filipino backgrounds who lived and established social and cultural institutions in SoMa beginning in the 1960s.
Transgender District (also known as the Compton's Transgender Cultural District)	2017	Located within the Tenderloin and SoMa neighborhoods. Bounded roughly by Ellis Street to the north, Mason Street to the east, Market Street to the south, and Jones Street to the west, with an extension along Sixth Street.	Honors San Francisco's communities that are Transgender, Gender-variant, Intersex, Lesbian, Gay, Bisexual (TGILGB) affirming. Recognizes historical sites/sites of important events, community and cultural spaces, nightlife spaces as centers of community building, social services, and housing associated with TGILGB communities.
Leather and LGBTQ Cultural District	2018	Located across much of the western SoMa neighborhood, generally bounded by Howard Street, Seventh Street, Interstate 80, and U.S. 101.	Recognizes the significant historic context of the LGBTQ enclave that developed in SoMa after 1950, with an important concentration of businesses, nightlife establishments, arts and health centers, and social institutions that served the needs of members of LGBTQ communities. In particular, many bars and bathhouses in SoMa catered to those who were affiliated with the gay male leather community.

Name	Year Established	Location	Thematic Scope
African American Arts and Cultural District	2018	Located within the Bayview Hunters Point neighborhood. Bounded by Cesar Chavez Street (projected through Pier 80) to the north, San Francisco Bay to the east and south (until Harney Way reaches U.S. 101), and U.S. 101 to the west.	Acknowledges and supports preservation of the African American cultural legacy in the district, particularly African American migrants from the South who came to San Francisco during World War II. Cultural assets include cultural and artistic traditions, community institutions, public realm elements, parks and recreational spaces, and small businesses.
Castro LGBTQ Cultural District	2019	Contains the Castro District, generally bounded by Market Street, Sanchez Street, Noe Street, and 22 nd Street. Also includes an extension along the Upper Market Street commercial corridor.	Has pronounced political, social, economic, and historical significance to the LGBTQ community because it became a global focal point for the development of gay culture, community, and politics in the 1970s. LGBTQ culture and heritage is embedded in neighborhood sites, institutions, businesses, nonprofits, customs, and events.
American Indian Cultural District	2020	Encompasses an approximately 26-block area primarily within the Mission District. Bounded roughly by Duboce Avenue to the north, Folsom Street to the east, 17 th Street to the south (with a small part projecting farther south to 18 th Street), and Sanchez Street to the west.	Recognizes a geographic region that is of great historical and cultural significance to the American Indian community. It contains a unique concentration of historical events, cultural resources, programming, services, and gathering spaces that are historically and presently important to the American Indian community in the San Francisco Bay Area.
Sunset Chinese Cultural District	2021	Contains the Outer Sunset neighborhood, bounded by Lincoln Way to the north, 19 th Avenue to the east, Sloat Boulevard to the south, and the Great Highway to the west.	Encompasses a neighborhood containing a working-class, multi-generational Chinese immigrant and Chinese-American community that has had a commercial and residential presence in the Sunset District since the immediate post-World War II period.

Source: City and County of San Francisco Board of Supervisors, Resolution 129-18, file no. 171019, May 1, 2018; City and County of San Francisco Board of Supervisors, Resolution 239-17, file no. 170131, June 13, 2017; City and County of San Francisco Board of Supervisors, Ordinance 316-18, file no. 1881080, December 11, 2018; City and County of San Francisco Board of Supervisors, Ordinance 160-19, file no. 190389, July 9, 2019; City and County of San Francisco Board of Supervisors, Case no. 2020-009508PCA, file no. 201088, November 4, 2020; City and County of San Francisco Board of Supervisors, Ordinance 121-21, file no. 210599, July 27, 2021; Garo Consulting, *Calle 24 Latino Cultural District Report on the Community Planning Process*, prepared for the Calle 24 Latino Cultural District Community Council, San Francisco, CA, 2014; Donna Graves, Japantown Task Force, Page & Turnbull, San Francisco Heritage, Seifel, Inc., *Japantown Cultural Heritage and Economic Sustainability Strategy*, prepared for the City and County of San Francisco, San Francisco, CA, 2013; San Francisco Planning Department and SoMa Pilipinas Working Group, *SoMa Pilipinas Progress Report*, San Francisco, CA, 2016.

Table F-5. Context Statements and Theme Studies Addressing Neighborhoods with Greatest Likelihood of Change under the Housing Element Update¹

Context Name	Year Adopted	Thematic Scope and/or Geographic Extent	Time Period	Evaluative Frameworks
San Francisco Neighborhood Movie Theater Historic District Context Statement	2006	Describes small, midsize, and large movie theaters in San Francisco's neighborhood-focused commercial districts.	1906–1945	Provides statement of significance, interior and exterior character-defining features a property must meet to meet Criteria A and C, and examples properties of three San Francisco theater types (nickelodeons, neighborhood movie palaces, and combination houses).
Van Ness Auto Row Support Structures	2010	Describes the development of resources located along the Van Ness Avenue corridor between Pacific and Market streets associated with San Francisco's early 20 th -century automotive industry, such as showrooms, public garages, repair/service shops, and supply stores.	1906–1930s	Presents historic context that informs resources' potential architectural and historical significance associated with San Francisco's early automotive industry, specifically focusing on Criteria A and C significance; guidance on integrity assessment of automobile-related properties is also included.
Sunset District Residential Builders, 1925–1950 Historic Context Statement	2013	Provides historic context for speculatively built single-family homes in Sunset District residential tracts constructed in the first half of the 20 th century.	1925–1950	Presents significance and integrity thresholds for Sunset District residences for Criteria A/1, B/2, and C/3 and identifies typical character-defining features; district evaluation guidelines are also presented.
Draft Gardens in the City: San Francisco Residence Parks, 1906–1940 Historic Context Statement	In progress	Details the development of “residence parks,” which are privately developed residential neighborhoods built in the first half of the 20 th century that drew upon City Beautiful and 19 th -century suburban planning ideals.	1906–1940	Establishes significance and integrity thresholds for residential properties within residence parks, as well as entire districts, including thresholds properties must meet to be eligible under Criteria A/1, B/2, and C/3; cultural landscape elements are among the character-defining features presented.

¹ Please also refer to Table F-3, Historic Context Statements Addressing Social History and Cultural Heritage, which address additional resource types anticipated for change under the proposed action but not repeated in this table.

Context Name	Year Adopted	Thematic Scope and/or Geographic Extent	Time Period	Evaluative Frameworks
Draft Neighborhood Commercial Buildings Historic Context Statement and Survey	In progress	Describes urban historical and aesthetic trends that influenced the development of San Francisco's neighborhood commercial districts and the physical forms of storefronts and signage.	1865–1965	For each time period covered in the context statement (1865–1905, 1906–1929, and 1930–1965), presents significance thresholds, associated property types, integrity guidance, and example character-defining features.
Flats and Small Apartment Buildings Theme Study	In progress	Explains the construction of small-scale multiple-residence buildings across San Francisco in the 20 th century.	1915–1978	Establishes significance thresholds, integrity guidance, and district evaluation guidance for flats and small apartment buildings; also identifies the forms, features, and architectural styles commonly found on buildings of this type.
Draft Earthquake Shacks Theme Study	€ <u>2021</u>	Describes the development of the earthquake shack typology citywide.	20 th century, focus on reconstruction era (1906–1915)	Provides examples of potentially eligible extant earthquake shacks that may meet the requirements of Criteria A/1 and C/3; also focuses on how to identify extant earthquake shacks and provides integrity thresholds to assist the staff in determining eligibility.
Early Residential Development in San Francisco Theme Study	In progress	Provides information on San Francisco's 19 th -century residential development and architectural trends that influenced housing construction citywide.	1848–1899	Establishes evaluation guidance that includes thresholds for significance under Criteria A/1, B/2, and C/3; guidance also emphasizes special considerations for relative rarity by era of construction and location in the city.
Private Institutions Theme Study	In progress	Broadly characterizes the development of religious, educational (private schools), recreation/cultural, and funerary institutions located citywide.	Focus on late 19 th and 20 th centuries	For each property type, establishes significance thresholds under Criteria A/1, B/2, and C/3 as well as integrity considerations and examples of eligible properties.
Draft Social Halls and Clubs Theme Study	In progress	Discusses social halls and clubs throughout the city, including those with ethnic or cultural associations.	1848–1989 (preliminary)	Provides examples of potentially eligible properties that may meet the requirements of Criteria A/1, B/2, and C/3.

Context Name	Year Adopted	Thematic Scope and/or Geographic Extent	Time Period	Evaluative Frameworks
Draft Developer Tracts Theme Study	In progress	Includes three thematic studies organized around identified periods of residential development citywide: streetcar suburbanization (1880–1920); automobile suburbanization (1920–1950); and post–World War II suburbanization (1950–1989). Discusses the history of the specific period of development, including property types that are most closely associated with the time period.	1880–1989	Presents an evaluative framework for each period of development that provides examples of potentially eligible properties that may meet the requirements of Criteria A/1, B/2, or C/3. Each thematic study will provide special considerations for the assessment of integrity for related resources.
Draft Redevelopment Theme Study	In progress	Defined redevelopment areas citywide. The theme study will discuss significant activities by the San Francisco Redevelopment Agency, as well as efforts by community leaders, groups, and organizations, to resist the redevelopment of their neighborhoods.	1948–2012	Presents a chronology of projects undertaken by the San Francisco Redevelopment Agency during its tenure from 1948 to 2012. Evaluative frameworks are under development.

Source: Richard Brandi and Denise Bradley, *Gardens in the City: San Francisco Residence Parks, 1906–1940 Historic Context Statement*, prepared for the Western Neighborhoods Project, 2016; Mary Brown, *Sunset District Residential Builders, 1925–1950 Historic Context Statement*, prepared for the City and County of San Francisco, San Francisco, CA, 2013; ICF, *Theme Study: Early Residential Development in San Francisco, 1848–1899*, prepared for the San Francisco Planning Department, San Francisco, CA, 2021; ICF, *Theme Study: Flats and Neighborhood-Scaled Apartment Buildings in San Francisco, 1915–1978*, prepared for the San Francisco Planning Department, San Francisco, CA, 2021; ICF, *Theme Study: San Francisco Private Institutions Sub-Themes: Religion, Education, Recreation/Culture, and Funerary*, prepared for the San Francisco Planning Department, San Francisco, CA, 2021; William Kostura, *Van Ness Auto Row Support Structures: A Survey of Automobile-Related Buildings along the Van Ness Avenue Corridor*, prepared for Department of City Planning, San Francisco, CA, 2010; Andrew Murray and Katie Tom, *San Francisco Neighborhood Movie Theater Non-Contiguous Multiple Property Historic District*, prepared for the City and County of San Francisco, San Francisco, CA, 2006; San Francisco Planning Department, *Historic Context Summaries*, draft, October 2021; San Francisco Planning Department, *San Francisco Neighborhood Commercial Buildings, Historic Context Statement 1865–1965*, San Francisco, CA, 2021.

ATTACHMENT 8

Revised Transportation Supporting Information (EIR Appendix G)

San Francisco Housing Element 2022 Update – Transit Analysis Approach

Transit delay analysis was completed consistent with San Francisco Transportation Impact Analysis Guidelines for the Housing Element Environmental Impact Report. Transit capacity analysis was completed for informational purposes at the request of SFMTA to be used as a Fleet Needs Assessment. These two analyses were conducted in tandem and used the same underlying data and forecasts.

This document describes the analysis setup, the delay analysis approach, the delay analysis results, the capacity analysis approach, and the capacity analysis results. The analysis is based on a combination of observed data and outputs from the San Francisco County Transportation Authority's (SFCTA) SF-CHAMP travel demand model. CHAMP analysis is itself built on statistically significant data products such as the Census and the California Household Travel Survey. Therefore, real-world data underlies all assumptions in this analysis and observations were used to validate the outputs and check the reasonableness of the results. The transportation team determined that the delay and capacity results were reasonable for each of the land use scenarios studied as part of the Housing Element 2022 update.

Analysis Setup

The scale of the analysis, study scenarios, model types, and model inputs used to develop the future year (2035 and 2050) forecasts for the EIR are described below.

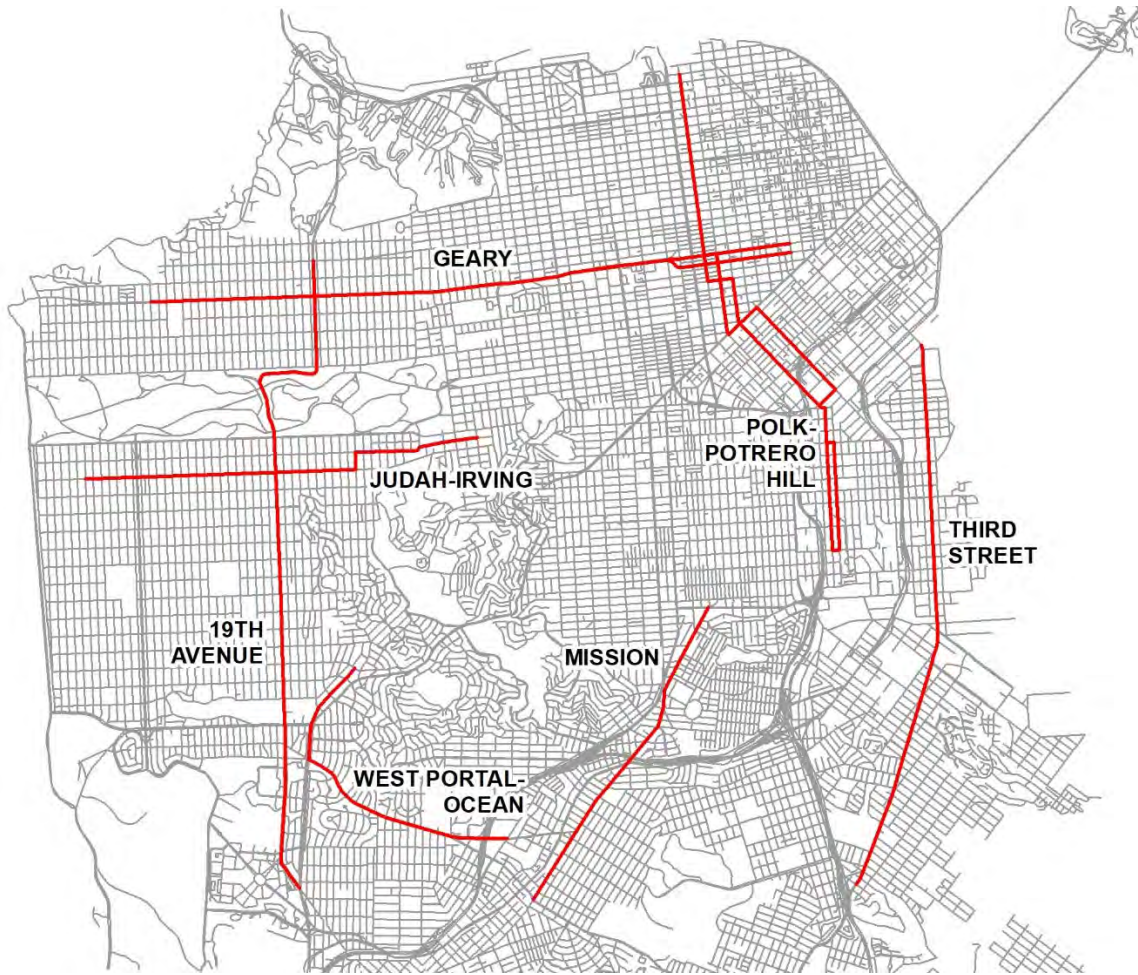
Analysis Scale

As outlined in the memorandum *San Francisco Housing Element Transportation Data Collection Methodology* (Fehr & Peers, February 24, 2021), the CEQA transit impact analysis focused on seven study corridors that provide a representative depiction of transportation conditions throughout San Francisco under the land use concepts. The Transportation Team, in coordination with the San Francisco Planning Department (Planning Department) and SFMTA, selected the seven representative study corridors shown in **Table 1** to represent a citywide cross-section of transportation facilities and land use types. The study corridors are listed below and shown with the selected representative streets within each corridor on **Figure 1**.

Table 1: Housing Element Study Corridors

Corridor Name	Muni Route	Begins At	Includes	Ends At
Geary	38 Geary/ 38R Geary Rapid	34 th Avenue	Geary Boulevard, Geary Street, O'Farrell Street	Powell Street
Polk-Potrero Hill	19 Polk	North Point Street	Polk Street, Larkin Street, Hyde Street, Market Street, Seventh Street, Eighth Street, Rhode Island Street, De Haro Street	23 rd Street
Third Street	T Third	Channel Street	Third Street	Le Conte Avenue
Mission	14 Mission/ 14R Mission Rapid	Cesar Chavez Street	Mission Street	Geneva Avenue
West Portal-Ocean	K Ingleside	Ulloa Street	West Portal Avenue, Junipero Serra Boulevard, Ocean Avenue	San Jose Avenue
19 th Avenue	28 19 th Avenue/ 28R 19 th Avenue Rapid	California Street	Park-Presidio Boulevard, Crossover Drive, 19 th Avenue	Junipero Serra Boulevard
Judah-Irving	N Judah	43 rd Avenue	Judah Street, Irving Street, Carl Street	Cole Street

Figure 1: Housing Element Study Corridors



Analysis Scenarios

The Transportation Team analyzed SF-CHAMP model outputs for the following scenarios for the EIR impact analysis:

1. Existing conditions (2020)
2. 2035 and 2050 Baseline conditions (assumes a continuation of existing housing element plans and policies)
3. 2035 and 2050 Proposed Action
4. 2035 and 2050 Land Use Concept A – East Side
5. 2035 and 2050 Plan Bay Area 2050
6. 2050 Cumulative Scenario – Proposed Action + Waterfront Plan + Second Transbay Tube, Caltrain Business Plan, and Downtown Congestion Pricing (qualitative analysis only)

The existing conditions (2020) model outputs are used to describe the EIR existing conditions and compared to existing transit data. The remaining analysis scenarios allow for the development of 2035 and 2050 no project baseline conditions, and for a comparison of the no project baseline conditions to conditions under each land use concept for the EIR impact analysis.

Analysis Tools

The Transportation Team used two transportation models to prepare outputs for the transit delay analysis: the SF-CHAMP model and a Visum post-processing model.

Visum, developed by PTV Group, is a traffic analysis, travel demand forecasting, and GIS-based data-management software. The transportation team created a Visum model that serves as a GIS-based repository for the SF-CHAMP model's inputs and outputs, including land use tables, highway network, auto and transit assignment results, VMT results, etc. The Visum model was used to review the reasonableness of the SF-CHAMP model outputs, and to prepare visual and tabular summaries of the SF-CHAMP outputs for the EIR. Additionally, the Visum model was used to conduct the transit delay analysis for the Housing Element 2022 Update, by incorporating intersection capacities and revised assumptions provided by SFMTA for signal timing, transit-only lanes, and transit signal priority.

Public Transit Delay Approach

There are two components to transit travel time: dwell time and moving time. The dwell time includes the time for passengers to board or alight the transit vehicle. The moving time includes the time spent moving along a corridor and stopped at intersections or in congestion.

SF-CHAMP calculates the dwell time for each boarding and alighting. The Transportation Team adjusted the raw dwell time estimates from SF-CHAMP by using existing ridership data from Muni and forecasted ridership growth from SF-CHAMP to estimate future year ridership and dwell time, as described further under the Dwell Time section below.

In future year 2035 and 2050 scenarios, many of the transit study corridors are characterized by one or more of the following – planned bus-lane improvements, varying degrees of transit signal priority, and congested, mixed flow roadway conditions. These factors influence transit travel times in the future baseline and project alternative scenarios; however, travel time delays caused by congestion are not well captured in SF-CHAMP. To better account for these factors, the Transportation Team added additional calibration of the SF-CHAMP moving time outputs as described in the Moving Time section below.

Dwell Time

Ridership Calibration

Stop-level boards and alights are the key input to dwell time calculations. The Transportation Team applied the following steps to inbound and outbound routes in the AM and PM peak periods for each transit corridor to forecast future transit ridership.

Ridership Data Inputs

The ridership forecast drew on multiple data sources. Muni Metro (light rail) ridership data from 2016 was used as the light rail baseline. A combination of Muni bus ridership data from January/February 2020 and 2015 was used as the bus baseline.¹ The ridership forecast used SF-CHAMP outputs for future Housing Element baselines and land use concepts to scale the Muni transit ridership baseline in order to determine a forecast.

Segment Aggregation and Data Cleanup

The Transportation Team divided each Muni study corridor into segments. The rationale for using segments is primarily because there is not a one-to-one relationship between Muni 2020 stop locations, CHAMP 2020 baseline stop locations, and future year CHAMP stop locations. This is both a product of slight disagreement between Muni and CHAMP, and anticipated trends toward

¹ Muni Metro 2016 ridership data provided by SFMTA on March 12, 2021; Muni bus 2015 and 2019 ridership data provided by SFMTA on August 30, 2021.

stop consolidation and relocation in the future. Segment breakpoints were determined by considering service patterns (such as short patterns), major transfer points, and long stretches without stops, with a goal of 3-7 stops per segment, depending on the stop density. As an example, segments for the 14 Mission corridor are shown below.

Figure 2: Mission Corridor Study Segments



Muni stop-level data, CHAMP stop-level data, and raw automated passenger counter (APC) data were associated with a segment by route and direction using GIS spatial referencing tools.

All data were aggregated to both the segment level and route level for the AM and PM peak periods. Due to small discrepancies in both observed data and modeled SF-CHAMP outputs, both boards and alights were set to the larger of the two.

Exceptions

The K Ingleside and T Third Street Muni Metro routes occupy a unique place in this methodology, as they are currently interlined, but will not be so in the future. To compensate, this analysis made two modifications to the K and T data:

- Due to its interlining with the K, the T currently has a reversed directionality, where Sunnydale is inbound and downtown is outbound. This directionality was preserved in all baselines and land use concepts, even when the T is not interlined, for the sake of consistency. Therefore, “inbound T” should always be interpreted as the southbound T towards Sunnydale.
- In order to scale ridership on the K and T in future baseline and land use concept, it is necessary to have a separate K and T in 2020 for comparison. This was achieved by

artificially splitting the K and T along the Market Street Subway. All boards and alights between Metro Van Ness and Metro Embarcadero stations were divided between the two routes based on the direction of travel. All outbound boards and inbound alights were assigned to the K and all inbound boards and outbound alights were assigned to the T. The route-level boards and alights were then adjusted to be the larger of the two, in line with the methodology noted above.

Ridership Scaling

For the purpose of this analysis, “ridership” refers to the boards and alights for a given transit route, either at the stop, segment, or route scale.

Future-year transit ridership was forecast at the route-level. A scaling factor was developed by dividing Muni 2020 route-level ridership by the SF-CHAMP 2020 baseline route-level outputs. These scaling factors were applied to all future year SF-CHAMP baselines and land use concepts to generate scaled route-level ridership for each baseline or concept, in the AM and PM peak periods in the inbound and outbound directions.

Exceptions

An irregularity was noticed with the 28R 19th Avenue Rapid PM data in the outbound direction. Due to abnormally high Muni 2020 route-level ridership data and abnormally low SF-CHAMP 2020 baseline route-level outputs, the resulting scaling factor indicated that future-year CHAMP outputs should be scaled up by 23%. This is in contrast to the scaling factors for the other three time period/direction combinations, which indicated that future-year CHAMP outputs should be scaled down by 30-60%. This PM outbound scaling factor produced unreasonably high ridership estimates in the future, and it was determined that the scaling factor as calculated was the result of errors in either the Muni data or CHAMP outputs and was not representative of true future-year conditions. In order to produce a reasonable replacement scaling factor, the average of the other three time period/direction combinations was used to reflect appropriate scaling for the route as a whole.

Segment-level and Stop-level Ridership Generation

Muni observed board and alight data at the segment- and route-level were used to determine the proportion of route-level boards and alights that each segment represents. The same was done with SF-CHAMP outputs in all baseline and land use concepts. The data sources were averaged together to produce final board and alight splits by segment. These board and alight splits by segment were used to proportionally distribute the scaled route-level boards and alights among the segments.

Due to changes in routing and stop locations, only SF-CHAMP boards and alights for the appropriate baseline or land use concept were used to produce similar board and alight splits by

stop within each segment. These splits were used to proportionally distribute the scaled segment-level boards and alights among the stops within the segment. If SF-CHAMP reported no boards or alights in a given segment, the split was assumed to be equal between all stops in the segment.

Lastly, the number of buses in a peak period as assumed by SF-CHAMP was used to produce average stop-level boards and alights by peak period run, in addition to the aggregate boards and alights for the entire three-hour peak period produced above.

Exceptions

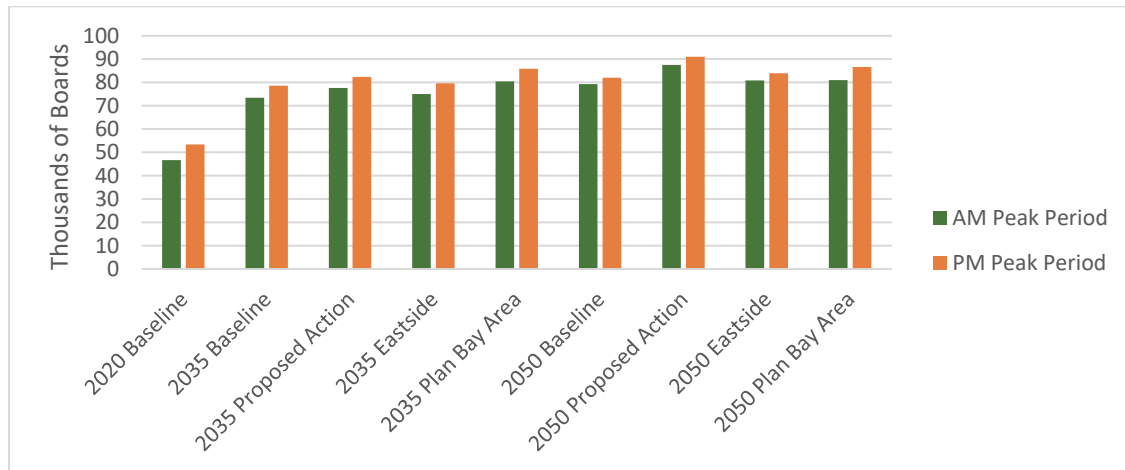
When producing segment-level boards and alights, some routes simply used the reported SF-CHAMP splits rather than averaging them with the Muni 2020 splits. This is a result of routing differences that would make using the Muni 2020 data unreasonable. As an example, the available Muni data for the 5 Fulton includes boards and alights all the way to Ocean Beach, while the SF-CHAMP data assumes the bus to stop at Eighth Avenue; therefore, SF-CHAMP splits were used in all baselines and land use concepts, including the 2020 baseline. In the case of five other routes, the future routing assumed in SF-CHAMP differs significantly from the existing routing: the K, T, 19, 47, and 28R; therefore, SF-CHAMP splits were used in all future year baselines and land use concepts.

Ridership Forecast Results

The high-level transit ridership forecasts align with trends observed in the broader Housing Element Update travel demand analysis. As shown in **Figure 3**, total boards for all study routes increase substantially between the 2020 Existing Baseline and 2035 Midpoint Baseline. Of the three 2035 land use scenarios, the Plan Bay Area scenario adds the most ridership to the study corridors, followed by the Proposed Action scenario. The Eastside scenario does not substantially change ridership in the study corridors (which are skewed more towards the west side) when compared to the 2035 Midpoint Baseline.

The 2050 Environmental Baseline sees higher ridership than the 2035 Midpoint Baseline, but the increase between the two analysis years is not as great as the increase between 2020 Existing and the 2035 Midpoint Baseline. This likely reflects the substantial investment in transit upgrades (service increases, transit-only lanes, signal priority, etc.) before 2035 and then no known further upgrades between 2035 and 2050. By 2050, the Proposed Action scenario adds more ridership to the study corridors than either the Eastside or Plan Bay Area scenarios.

Figure 3: Total Boards for All Study Routes by Land Use Concept



Dwell Time Calculation

Dwell times were calculated using the method prescribed by SF-CHAMP. Due to their more streamlined boarding experience, SF-CHAMP assumes a constant dwell time per stop for all Muni Metro lines. As a result, Muni Metro lines do not see a change in future dwell time. For bus routes, SF-CHAMP assumes a constant delay time per stop based on transit vehicle type that is unaffected by ridership, as well as a delay time per board and a delay time per alight. The full equation is:

$$\text{Stop dwell time} = \text{constant delay} + (\text{delay per board} * \text{boards}) + (\text{delay per alight} * \text{alights})$$

Moving Time

The moving time adjustments incorporate intersection capacities and traffic signal delay to supplement the link-level capacities and delay estimated by the SF-CHAMP model.

This was achieved by coding the intersection lane configuration and control type (signalized, two-way stop etc.) for intersections along the study corridor in the Visum platform. Based on the lane configurations, typical capacities were assigned to individual turning movements at the intersection. The intersection capacity is estimated as follows:

$$\text{Intersection Capacity (C)} = K * (\text{sum of entering lane capacities})$$

Where the coefficient 'K' is used to simulate the effect that a green time-to-cycle length (g/C) ratio has at a signalized intersection. Typical values for K are in the range of 0.4 to 0.6 – when similar roadway classes intersect, the g/C ratio is typically even (around 0.5), and as the class difference between intersecting roadways increases, the g/C ratio increases for the major facility and decreases for the minor facility.

Next, the *TModel*² methodology was applied in the Visum model to estimate the delay at the intersection based on the following relationship:

$$\text{Intersection Delay } (t) = a + d * \left(\frac{V}{C} + f \right)^b$$

Where:

V = entering volume at the intersection

C = intersection capacity

The parameters of the turn delay equation are based on typical values in published research and previously calibrated models³ and include a step function to better model the effects of increased delay once a defined saturation (V/C) threshold is exceeded. Typical parameters for signalized intersection are below:

	a	d	f	b
V/C ≤ 0.95	1	15	0.05	3.6
V/C > 0.95	3	15	0.05	5

The transit travel times were further adjusted to incorporate the effect of transit-only lanes and transit signal priority:

- Transit only lanes – to account for buses bypassing vehicle queues, delay was estimated based on the cycle length of the intersection, typical green times and the arrival (uniformly distributed) of the bus at the intersection.
- Transit signal priority (TSP) – travel time savings for transit signal priority was based on assumptions confirmed by SFMTA.

The transit-only lane and transit signal priority assumptions for existing and future year conditions are presented in Attachment A. All planned transit-only lane and transit signal improvements are planned to be in place by 2035, which means that they would also be in place in 2050.

The final moving time estimate is the sum of the link-level moving time, intersection/turn delay, transit-lane adjustments, and TSP adjustments.

² TMODEL Reports, Volume 6, Number 1, TMODEL Corporation, Vashon, WA, April 1996.
Travel Model Speed Estimation and Post Processing Methods for Air Quality Analysis, Travel Model Improvement Program (TMIP), October 1997. Travel Demand Model Documentation, 2018 Update, YVCOG, 2018

³ City of South San Francisco Sub-Area Travel Demand Model, Fehr & Peers, 2020
Travel Demand Model Documentation, 2018 Update, YVCOG, 2018. Comprehensive Transportation Study for City of Deming/Luna County, WHPacific, 2009

Total Travel Time

The final travel time estimate for the corridor is the sum of all the segment level moving times and individual stop dwell times.

Travel Time Forecasting Results

Travel time forecasts and deltas between the 2020, 2035, and 2050 analysis years confirm the effectiveness of SFMTA's transit improvement plans, particularly those illustrated in Attachment A. As seen in **Table 2** and **Table 3**, all transit routes in the study corridors are faster in 2035 than observed travel times in the 2020 Existing (pre-Covid) baseline. Travel times slow somewhat by 2050, but all 2050 Environmental Baseline travel times are still faster than 2020 observed travel times for the routes in the study corridors. Land use concepts (Eastside, Plan Bay Area, and Proposed) generally add travel time when compared to the 2035 and 2050 baseline scenarios (there are a few exceptions such as the K Ingleside in the Eastside scenario, which is equal to the baseline travel time or a few seconds quicker than in the relevant baseline).

The Plan Bay Area and Proposed Action scenarios show the greatest travel time increases in the corridors when compared to the 2035 and 2050 baseline scenarios. The Geary corridor shows travel times increases under both scenarios while other travel time effects are scenario-specific; the T-Third is slowest with the Eastside and Plan Bay Area scenarios while the 28 19th Avenue is slowest with the Proposed Action scenario. Because of route changes to the 19 Polk in the Civic Center area by 2035 midpoint conditions, the total travel distance will be less than under existing conditions. Thus, due to the route alignment changes, the existing and future travel times are not comparable.

Notes: IB = inbound, OB = outbound. Within each row, a green-to-red spectrum is used to show the quickest and slowest travel times. The 19 Polk bus route extends between North Point and 23rd streets. Because of route changes in the Civic Center area by 2050 environmental baseline conditions, the total travel distance will be less than under 2020 conditions. Thus, due to the route alignment changes, the 2020 and 2050 environmental baseline conditions are not comparable.

Table 4 shows moving time and dwell time deltas separately when comparing each of the 2050 land use concepts with the 2050 Environmental Baseline. As shown in this table, vehicle congestion (or moving time delay) is the predominant factor contributing to transit delay rather than additional transit ridership (or dwell time delay).

Table 2: AM Total Travel Time by Route and Land Use Concept

Route	AM								
	2020	2035				2050			
	Observed	Baseline	Eastside	PBA	Proposed	Baseline	Eastside	PBA	Proposed
14 Mission IB	20:18	15:42	15:41	15:36	15:42	15:53	15:49	16:06	15:57
14 Mission OB	17:12	13:06	13:10	13:19	13:06	13:28	13:30	13:49	13:30
14R Mission Rapid IB	15:48	12:17	12:14	12:14	12:15	12:26	12:22	12:44	12:32
14R Mission Rapid OB	13:30	10:06	10:07	10:13	10:06	10:24	10:24	10:43	10:27
19 Polk IB (2020)	52:06								
19 Polk OB (2020)	46:42								
19 Polk IB (Future)		37:53	38:49	40:14	37:46	40:12	42:50	45:02	40:45
19 Polk OB (Future)		33:07	34:07	36:31	33:15	36:06	38:49	41:26	36:51
28 19 th Avenue IB	33:12	29:41	29:50	29:52	30:25	30:17	30:35	30:54	31:45
28 19 th Avenue OB	27:18	23:43	23:44	24:03	24:18	24:04	24:18	25:00	25:25
28R 19 th Avenue Rapid IB	28:00	25:13	25:18	25:33	25:42	25:43	25:51	26:27	26:46
28R 19 th Avenue OB	28:30	25:46	25:53	26:11	26:19	26:22	26:33	27:11	27:33
38 Geary IB	27:36	22:32	22:40	23:51	23:54	22:53	23:20	25:04	24:57
38 Geary OB	34:24	30:46	30:53	32:22	32:00	31:13	31:35	33:28	33:02
38R Geary Rapid IB	22:18	20:47	21:00	22:36	22:28	21:12	21:47	23:50	23:53
38R Geary Rapid OB	28:42	27:54	28:02	29:14	29:05	28:21	28:47	30:19	30:05
K Ingleside IB	22:54	17:06	17:05	17:11	17:13	17:07	17:07	17:16	17:27
K Ingleside OB	19:12	14:31	14:31	14:36	14:38	14:32	14:32	14:41	14:52
N Judah IB	19:06	16:19	16:20	16:21	16:33	16:26	16:27	16:40	17:00
N Judah OB	16:30	14:05	14:05	14:09	14:16	14:11	14:12	14:25	14:29
T Third IB	27:42	26:30	26:40	28:04	26:41	27:19	27:45	30:23	27:45
T Third OB	28:24	27:21	27:31	28:53	27:30	28:17	28:43	31:23	28:41

Notes: IB = inbound, OB = outbound.

Within each row, a green-to-red spectrum is used to show the quickest and slowest travel times.

The 19 Polk bus route extends between North Point and 23rd streets. Because of route changes in the Civic Center area by 2050 environmental baseline conditions, the total travel distance will be less than under 2020 conditions. Thus, due to the route alignment changes, the 2020 and 2050 environmental baseline conditions are not comparable.

Table 3: PM Total Travel Time by Route and Land Use Concept

Route	PM								
	2020	2035				2050			
	Observed	Baseline	Eastside	PBA	Proposed	Baseline	Eastside	PBA	Proposed
14 Mission IB	21:30	20:17	20:19	20:22	20:23	20:26	20:23	20:53	20:41
14 Mission OB	21:42	18:33	18:36	18:31	18:36	18:48	18:50	19:02	18:55
14R Mission Rapid IB	15:18	12:45	12:49	12:47	12:50	13:00	13:00	13:17	13:10
14R Mission Rapid OB	16:36	14:45	14:51	14:41	14:50	15:01	15:01	15:12	15:10
19 Polk IB (2020)	57:12								
19 Polk OB (2020)	52:18								
19 Polk IB (Future)		41:40	42:39	44:32	41:52	44:57	48:18	50:44	46:28
19 Polk OB (Future)		40:54	42:03	43:03	40:30	44:15	48:33	50:31	45:12
28 19 th Avenue IB	33:24	29:37	29:39	29:49	30:28	29:57	30:18	30:59	32:07
28 19 th Avenue OB	33:48	31:05	31:05	31:12	32:04	31:32	31:48	32:26	33:44
28R 19 th Avenue Rapid IB	22:30	20:17	20:27	20:33	21:13	20:36	20:50	21:32	22:29
28R 19 th Avenue OB	31:48	29:07	29:13	29:34	29:58	29:37	29:50	30:40	31:20
38 Geary IB	31:06	25:39	25:51	27:10	26:52	26:10	26:41	28:27	27:55
38 Geary OB	38:00	33:48	34:01	34:58	34:59	34:16	34:47	36:18	36:01
38R Geary Rapid IB	25:30	22:43	22:56	24:04	23:53	23:19	23:48	25:21	25:07
38R Geary Rapid OB	30:42	29:47	30:00	31:11	31:17	30:07	30:45	32:31	32:38
K Ingleside IB	23:42	16:03	16:04	16:09	16:14	16:08	16:06	16:26	16:36
K Ingleside OB	21:24	14:56	14:56	15:02	15:07	15:00	14:59	15:19	15:28
N Judah IB	18:18	15:39	15:39	15:41	15:52	15:44	15:48	16:11	16:18
N Judah OB	18:36	16:13	16:13	16:11	16:31	16:20	16:23	16:48	17:09
T Third IB	27:24	26:30	26:37	27:48	26:37	27:13	27:41	29:52	27:39
T Third OB	30:00	29:06	29:14	30:25	29:12	29:48	30:19	32:29	30:13

Notes: IB = inbound, OB = outbound. Within each row, a green-to-red spectrum is used to show the quickest and slowest travel times. The 19 Polk bus route extends between North Point and 23rd streets. Because of route changes in the Civic Center area by 2050 environmental baseline conditions, the total travel distance will be less than under 2020 conditions. Thus, due to the route alignment changes, the 2020 and 2050 environmental baseline conditions are not comparable.

*Table 4: Change in Travel Time from 2050 Baseline by Route and Land Use Concept
(decimal minutes)*

Notes: shading is used to highlight the largest travel time changes

IB = inbound, OB = outbound. The 19 Polk bus route extends between North Point and 23rd streets. Because of route changes in the Civic Center area by 2050 environmental baseline conditions, the total travel distance will be less than under 2020 conditions. Thus, due to the route alignment changes, the 2020 and 2050 environmental baseline conditions are not comparable.

Route	AM						PM					
	Proposed Action 2050		Plan Bay Area 2050		Eastside 2050		Proposed Action 2050		Plan Bay Area 2050		Eastside 2050	
	Moving	Dwell	Moving	Dwell	Moving	Dwell	Moving	Dwell	Moving	Dwell	Moving	Dwell
14 Mission IB	0.1	0.0	0.3	-0.1	0.0	-0.1	0.1	0.1	0.2	0.3	0.1	-0.1
14 Mission OB	0.1	-0.1	0.3	0.0	0.0	0.0	0.1	0.0	0.2	0.1	0.1	0.0
14R Mission Rapid IB	0.1	0.0	0.3	0.0	0.0	-0.1	0.1	0.1	0.2	0.1	0.1	-0.1
14R Mission Rapid OB	0.1	0.0	0.3	0.0	0.0	0.0	0.1	0.0	0.2	0.0	0.1	-0.1
19 Polk IB (2020)	0.5	0.0	4.4	0.4	2.6	0.1	1.4	0.1	5.1	0.7	3.5	-0.1
19 Polk OB (2020)	0.7	0.0	4.8	0.6	2.8	-0.1	0.9	0.1	5.8	0.5	4.1	0.2
19 Polk IB (Future)	1.1	0.4	0.6	0.0	0.2	0.1	1.7	0.4	0.8	0.2	0.3	0.1
19 Polk OB (Future)	1.0	0.4	0.6	0.3	0.2	0.1	1.8	0.4	0.8	0.1	0.3	0.0
28 19 th Avenue IB	1.0	0.1	0.6	0.1	0.1	0.0	1.7	0.2	0.8	0.1	0.2	0.0
28 19 th Avenue OB	1.0	0.2	0.6	0.2	0.1	0.1	1.7	0.0	0.8	0.2	0.2	0.0
28R 19 th Avenue Rapid IB	1.8	0.3	2.0	0.2	0.5	0.0	1.5	0.3	1.7	0.6	0.5	0.0
28R 19 th Avenue OB	1.6	0.3	1.7	0.5	0.4	0.0	1.6	0.2	1.8	0.3	0.5	0.0
38 Geary IB	1.8	0.9	2.0	0.7	0.5	0.1	1.5	0.3	1.7	0.3	0.5	0.0
38 Geary OB	1.6	0.2	1.7	0.3	0.4	0.1	1.6	0.9	1.8	0.6	0.5	0.1
38R Geary Rapid IB	0.3	0.0	0.1	0.0	0.0	0.0	0.5	0.0	0.3	0.0	0.0	0.0
38R Geary Rapid OB	0.3	0.0	0.1	0.0	0.0	0.0	0.5	0.0	0.3	0.0	0.0	0.0
K Ingleside IB	0.6	0.0	0.2	0.0	0.0	0.0	0.6	0.0	0.5	0.0	0.1	0.0
K Ingleside OB	0.3	0.0	0.2	0.0	0.0	0.0	0.8	0.0	0.5	0.0	0.1	0.0
N Judah IB	0.4	0.0	3.1	0.0	0.4	0.0	0.4	0.0	2.7	0.0	0.5	0.0
N Judah OB	0.4	0.0	3.1	0.0	0.4	0.0	0.4	0.0	2.7	0.0	0.5	0.0

Public Transit Capacity Approach

The capacity analysis and Fleet Needs Assessment compare the ridership forecasts described in the delay section above to bus or train passenger capacity. This analysis was completed for the AM and PM weekday peak hours and evaluated for the average bus or train during the peak hour. Capacity results are presented for the 2035 Midpoint and 2050 Environmental Baseline.

Capacity was evaluated for the routes on the Housing Element Corridors as well as eight additional corridors jointly selected with SFMTA including:

1. Van Ness Avenue – 47 and 49
2. Fulton – 5 and 5R
3. Bayshore – 8
4. Sunset – 29
5. Haight/Noriega – 7
6. Ocean [View](#) – M
7. Taraval – L
8. O'Shaughnessy – 44

Defining Capacity

Muni uses three capacity values in their planning work:

- Planning Capacity – used to schedule service and measure utilization in the near future
- Crowding Capacity – used to measure the percent of trips where crowding is experienced and for longer-term planning
- Crush Capacity – used to measure runs where passengers can no longer board due to overcrowding

Passenger Capacity Standards (December 2019)

Vehicle Type		Seats	Standing Sq. Ft.	Running Board (Cable Car)	Total Load		
					Planning Capacity	Crowding Capacity	Crush Capacity
					4.5 ft ² /s	3.0 ft ² /s	1.5 ft ² /s
Rubber Tire	32 ft Bus	24	41.0		33	38	51
	40 ft Bus	31	59.6		44	51	71
	60 ft Bus	44	111.3		69	81	118
					3.7 ft ² /s	2.7 ft ² /s	1.8 ft ² /s
Rail	LRV	60	292.1		139	168	222
	Streetcar	33	132.0		69	82	106
	Cable Car (Powell)	30	28.8	14	52	55	60
	Cable Car (California)	36	28.8	16	60	63	68

Total Load = Total seated & standing passengers for specified capacity.

- ft²/s = square feet per standing passenger [A lower value equates to less space per person.]
 - = seats + (standing sq. ft. / sq. ft. per standing passenger)
 - For cable cars, the total load includes passengers standing on the running boards.
- For 40' & 60' buses, LRVs, and streetcars, the number of seats and the standing sq. ft. are based on a representative vehicle from each sub fleet.

The calculation parameters for each capacity level are shown in in the table above, which is an excerpt from SFMTA's Vehicle Capacity Standards.

Transit Capacity Results

The transportation team included the Crowding Capacity, Crush Capacity and CHAMP capacity (which falls somewhere between Crowding and Crush) values in the analysis for the Housing Element. The Crush Capacity is included to test whether transit access breaks down with the Housing Element. The results shown on the following pages confirm that no routes exceed Crush Capacity because of the Housing Element.

The Crowding Capacity is used for the Fleet Needs Assessment and is the basis of the utilization values presented in the results table. The results confirm that some routes will exceed Crowding Capacity with the Housing Element. A little over one-third of the routes that exceed capacity with the Housing Element also exceed capacity in the 2035 or 2050 Baseline.

San Francisco Housing Element 2022 Update

TRANSIT FLEET NEEDS ASSESSMENT - 2035

This analysis assumes perfect spreading in ridership across the peak period. Ridership represents an average bus during the peak period and is based on CHAMP ridership that has been adjusted using observed, pre-pandemic Muni data.

		Inbound															Outbound																						
		Existing Ridership	Existing Capacity	Existing MLP	Baseline Ridership	Baseline Capacity	Baseline MLP	Proposed Action Ridership	Proposed Action MLP	PBA Ridership	PBA MLP	LUC A Ridership	LUC A MLP	Existing Utilization	Baseline Utilization	Proposed Action Utilization	PBA Utilization	LUC A Utilization	Existing Ridership	Existing Capacity	Existing MLP	Baseline Ridership	Baseline Capacity	Baseline MLP	Proposed Action Ridership	Proposed Action MLP	PBA Ridership	PBA MLP	LUC A Ridership	LUC A MLP	Existing Utilization	Baseline Utilization	Proposed Action Utilization	PBA Utilization	LUC A Utilization				
		Weekday AM																			Weekday AM																		
CEQA Routes																																							
38 Geary	38	61	81	Larkin/O Farrell	20	81	Geary/Scott	23	Geary/Peter Yorke/Gough	21	Geary/Scott	21	Geary/Scott	75%	25%	28%	26%	25%	60	81	Geary/Larkin	29	81	Geary/Taylor	33	Geary/Taylor	46	Geary/Taylor	30	Geary/Taylor	74%	36%	41%	56%	38%				
38R Geary Rapid	38R	68	81	Van Ness/O Farrell	55	81	Geary/Fillmore	63	Geary/Fillmore	70	Geary/Fillmore	56	Geary/Fillmore	84%	68%	78%	87%	69%	48	81	Geary/Stockton	48	81	Geary/Stockton	49	Geary/Stockton	58	Geary/Leavenworth	49	Geary/Stockton	59%	59%	61%	72%	60%				
19 Polk/Future Route TBD	19	41	51	Townsend/7th	8	51	De Haro/16th	8	Townsend/7th	21	Brannan/7th	9	Townsend/7th	81%	16%	16%	41%	19%	29	51	8th/Mission	5	51	8th/Mission	6	8th/Mission	28	8th/Mission	5	8th/Mission	56%	10%	11%	56%	10%				
T Third*	T	156	168	Muni Van Ness Station	309	336	CS Stockton/Geary	317	CS Stockton/Geary	269	CS Stockton/Geary	309	CS Stockton/Geary	93%	92%	94%	80%	92%	82	168	3rd/20th	145	336	3rd/Mission Rock	141	3rd/Mission Rock	167	3rd/Mission Rock	153	3rd/Mission Rock	49%	43%	42%	50%	46%				
14 Mission	14	37	81	26th/Mission	46	81	26th/Mission	46	26th/Mission	45	30th/Mission	45	26th/Mission	46%	56%	57%	53%	56%	40	81	Mission/19th	50	81	Mission/18th	52	Mission/18th	58	Mission/18th	49%	62%	64%	71%	65%						
14R Mission Rapid	14R	51	81	30th/Mission	83	81	30th/Mission	83	30th/Mission	79	30th/Mission	82	30th/Mission	63%	103%	103%	98%	101%	22	81	Mission/16th	35	81	Mission/16th	35	Mission/16th	40	24th/Mission	27%	43%	44%	49%	45%						
K Ingleside	K	156	168	Muni Van Ness Station	124	168	Muni Van Ness Station	131	Muni Van Ness Station	130	Muni Van Ness Station	127	Muni Van Ness Station	93%	74%	83%	78%	76%	82	168	3rd/20th	22	168	Muni Civic Center Station	33	Muni Civic Center Station	33	Muni Civic Center Station	22	Muni Civic Center Station	49%	13%	11%	20%	13%				
28 19th Avenue**	28	37	51	Banbury/19th	30	51	Junipero Serra	31	19th/Junipero Serra	31	19th/Junipero Serra	29	19th/Junipero Serra	72%	59%	60%	61%	56%	20	51	19th/Omega	12	51	19th/Omega	13	19th/Omega	16	19th/Omega	39%	23%	26%	31%	23%						
28R 19th Avenue Rapid***	28R	13	51	Banbury/19th	30	51	Mission/Geneva	29	Mission/Geneva	33	Mission/Geneva	29	Mission/Geneva	25%	59%	57%	64%	57%	10	51	Ulloa/19th	12	51	Winston/19th	13	Winston/19th	13	Winston/19th	19%	23%	26%	26%	26%						
N Judah	N	189	336	Muni Van Ness Station	217	504	Muni Van Ness Station	253	Muni Van Ness Station	250	Muni Van Ness Station	225	Muni Van Ness Station	56%	43%	50%	50%	45%	50	336	Duboce/Church	59	504	Muni Civic Center Station	63	Duboce/Church	55	Muni Civic Center Station	60	Muni Civic Center Station	15%	12%	12%	11%	12%				
Non-CEQA Routes																																							
47 Van Ness****	47	34	51	Van Ness/Mc Allister	26	81	Market/Van Ness	28	Market/Van Ness	24	Market/Van Ness	30	Market/Van Ness	66%	33%	34%	29%	37%	37	51	Van Ness/Eddy	34	81	Van Ness/Eddy	37	Van Ness/Eddy	35	Van Ness/Sacramento	37	Van Ness/Eddy	73%	42%	45%	43%	45%				
49 Van Ness/Mission	49	45	81	Van Ness/Mc Allister	37	81	Market/Van Ness	37	Market/Van Ness	41	Market/Van Ness	37	Market/Van Ness	55%	46%	46%	51%	46%	29	81	Van Ness/Eddy	29	81	Van Ness/Eddy	31	Van Ness/Eddy	35	Van Ness/Eddy	31	Van Ness/Eddy	36%	36%	38%	43%	39%				
5 Fulton	5	46	51	Mc Allister/Laguna	21	51	Mc Allister/Fillmore	22	Mc Allister/Fillmore	27	Mc Allister/Laguna	21	Mc Allister/Laguna	91%	42%	43%	53%	40%	18	51	Larkin/Mc Allister	19	51	Larkin/Mc Allister	23	Larkin/Mc Allister	19	Larkin/Mc Allister	35%	36%	37%	44%	38%						
5R Fulton Rapid	5R	28	51	Mc Allister/Fillmore	32	51	Mc Allister/Fillmore	33	Mc Allister/Fillmore	37	Mc Allister/Fillmore	33	Mc Allister/Fillmore	55%	63%	65%	72%	64%	7	51	Jones/Market	6	51	Cyril Magnin/5th/Market	6	Cyril Magnin/5th/Market	8	Mc Allister/Divisadero	7	Mc Allister/Divisadero	14%	12%	12%	16%	13%				
8 Bayshore^	8	43	81	Bryant/I-80 E Off-ramp/4th	37	81	San Bruno/Silver	39	San Bruno/Silver	37	San Bruno/Silver	38	6th/Bryant	54%	46%	48%	45%	46%	38	81	Mission/Geneva	46	81	Mission/Geneva	46	Mission/Geneva	54	Madrid/Geneva	46	Mission/Geneva	47%	57%	56%	66%	57%				
29 Sunset^^	29	34	51	Meda/Ocean/Otsego	25	51	Ocean/Watson	25	Cayuga/Ocean	22	Cayuga/Ocean	24	Cayuga/Ocean	66%	49%	49%	44%	47%	34	51	Ocean/Lee	35	51	Plymouth/Ocean	38	Plymouth/Ocean	34	Plymouth/Ocean	67%	68%	74%	75%	67%						
7 Haight/Noriega	7	35	81	Haight/Laguna	54	81	Haight/Laguna	56	Haight/Laguna	57	Haight/Laguna	52	Haight/Laguna	43%	66%	69%	70%	65%	20	81	Market/Van Ness	25	81	Haight/Gough/Market	25	Haight/Gough/Market	28	Haight/Gough/Market	25	Haight/Gough/Market	25%	31%	31%	35%	31%				
M Ocean View	M	125	336	Muni Church Station	154	336	Muni Church Station	166	Muni Church Station	180	Muni Church Station	165	Muni Church Station	37%	46%	49%	54%	49%	40	336	Muni Church Station	55	336	Muni Church Station	53	Muni Church Station	94	Muni Castro Station	57	Muni Church Station	12%	16%	16%	28%	17%				
L Taraval	L	147	336	Muni Church Station	180	336	Muni Church Station	209	Muni Church Station	187	Muni Church Station	182	Muni Church Station	44%	54%	62%	56%	54%	27	336	Muni Civic Center Station	37	336	Muni Civic Center Station	36	Muni Civic Center Station	51	Muni Civic Center Station	36	Muni Civic Center Station	8%	11%	11%	15%	11%				
44 O'Shaughnessy^^^	44	67	51	Bosworth/Still/Lyell	52	51	Bosworth/Still/Lyell	48	Bosworth/Still/Lyell	57	Cayuga/Rousseau	51	Bosworth/Still/Lyell	131%	101%	95%	112%	101%	29	51	Princeton/Silver	22	51	Princeton/Silver	23	Princeton/Silver	25	Princeton/Silver	21	Princeton/Silver	57%	44%	46%	50%	42%				
CEQA Routes																																							
38 Geary	38	79	81	Van Ness/O Farrell	21	81	Geary/Peter Yorke/Gough/S	24	Geary/Peter Yorke/Gough/St	32	Geary/Peter Yorke/Gough/St	21	Geary/Peter Yorke/Gough/St	97%	26%	29%	39%	26%	98	81	Geary/Jones	44	81	Geary/Taylor	42	Geary/Taylor	44	Geary/Taylor	44	Geary/Taylor	121%	54%	52%	54%	54%				
38R Geary Rapid	38R	48	81	Van Ness/O Farrell	33	81	Van Ness/O Farrell	36	Van Ness/O Farrell	42	Van Ness/O Farrell	33	Van Ness/O Farrell	59%	41%	44%	52%	41%	84	81	Powell/Geary	80	81	Powell/Geary	92	Powell/Geary	91	Powell/Geary	104%	98%	114%	113%	100%						
19 Polk/Future Route TBD	19	35	51	Bryant/I-80 E Off-ramp/7th	8	51	7th/Harrison	8	7th/Harrison	31	7th/Harrison	8	7th/Harrison	68%	17%	15%	61%	15%	35	51	Brannan/8th	10	51	Division/Henry Adams	9	Division/Henry Adams	26	8th/Mission	10	Brannan/8th	69%	19%	17%	50%	19%				
T Third*	T	108	168	Embarcadero/Brannan	210	336	3rd/20th	211	3rd/20th	244	3rd/20th	217	3rd/20th	64%	62%	63%	73%	65%	99	168	Muni Powell Station	229	336	3rd/Mission Rock	226	3rd/Mission Rock	260	3rd/Mission Rock	234	3rd/Mission Rock	59%	68%	67%	77%	70%				
14 Mission	14	64	81	15th/Mission	73	81	Mission/20th	77	Mission/20th	76	26th/Mission	75	Mission/20th	79%	90%	95%	93%	92%	57	81	Mission/16th	61	81	Mission/16th	63	Mission/16th	64	Mission/16th	70%	76%	78%	79%	75%						
14R Mission Rapid	14R	31	81	Mission/11th	44	81	30th/Mission	46	30th/Mission	46	30th/Mission	44	30th/Mission	38%	54%	57%	56%	55%	60	81	Mission/16th	85	81	Mission/16th	86	Mission/16th	96	Mission/16th	75%	104%	109%	107%	107%						
K Ingleside	K	108	168	Embarcadero/Brannan	49	168	Muni Van Ness Station	53	Muni Van Ness Station	68	Muni Van Ness Station	52	Muni Van Ness Station	64%	29%	31%	41%	31%	99	168	Muni Powell Station	112	168	Muni Civic Center Station	122	Muni Civic Center Station	123	Muni Civic Center Station	114	Muni Civic Center Station	59%	67%	72%	73%	68%				
28 19th Avenue**	28	24	51	Taraval/19th	20	51	Taraval/19th	21	Taraval/19th	22	Taraval/19th	20	Taraval/19th	47%	39%	42%	42%	40%	19	51	Park Presidio/Park Presidio Bypass/Fulton	19	51	19th/Judah	20	19th/Judah	18	South/Cross Over	18	19th/Judah	36%	38%	40%	34%	35%				
28R 19th Avenue Rapid***	28R	10	51	19th/Judah	30	51	I-280 N Off-ramp/I-280 N O	32	I-280 N Off-ramp/I-280 N O	19	I-280 N Off-ramp/I-280 N O	32	I-280 N Off-ramp/I-280 N O	20%	59%	63%	37%	66%	7	51	19th/Irving	40	51	San Jose/Geneva	39	San Jose/Geneva	41	San Jose/Geneva	13%	79%	77%	93%	81%						
N Judah	N	78	336	Duboce/Noe	100	504	Muni Van Ness Station	111	Muni Van Ness Station	100	Muni Van Ness Station	103	Muni Van Ness Station	23%	20%	22%	20%	20%	171	336	Muni Civic Center Station	204	504	Muni Civic Center Station	227	Muni Civic Center Station	237	Muni Civic Center Station	208	Muni Civic Center Station	51%	41%	45%	47%	41%				
Non-CEQA Routes																																							
47 Van Ness****	47	33	51	Van Ness/Mc Allister	33	81	Market/Van Ness	35	Van Ness/O Farrell	34	Van Ness/O Farrell	35	Van Ness/O Farrell	64%	41%	43%	42%	43%	30	51	Van Ness/Eddy	32	81	Van Ness/Eddy	34	Van Ness/Eddy	32	Van Ness/Eddy	32	Van Ness/Eddy	59%	39%	42%	39%	39%				
49 Van Ness/Mission	49	43	81	Van Ness/Mc Allister	39	81	Market/Van Ness	39	Van Ness/Mc Allister	40	Van Ness/Mc Allister	41	Van Ness/Mc Allister	53%	48%	48%	50%	51%	58	81	Mission/16th	47	81	Van Ness/Mc Allister	47	Van Ness/Mc Allister	51	Van Ness/Mc Allister	47	Van Ness/Mc Allister	72%	57%	58%	63%	58%				
5 Fulton	5	18	51	Van Ness/Mc Allister	12	51	Mc Allister/Laguna	12	Mc Allister/Laguna	13	Mc Allister/Laguna	13	Mc Allister/Laguna	36%	23%	24%	26%	25%	40	51	Larkin/Mc Allister	39	51	Van Ness/Mc Allister	41	Van Ness/Mc Allister	50	Van Ness/Mc Allister	40	Van Ness/Mc Allister	79%	76%	79%	98%	79%				
5R Fulton Rapid	5R	16	51	Van Ness/Mc Allister	18	51	Van Ness/Mc Allister	19	Van Ness/Mc Allister	23	Van Ness/Mc Allister	19	Van Ness/Mc Allister	32%	36%	37%	44%	38%	50	51	Van Ness/Mc Allister	42	51	Van Ness/Mc Allister	45	Van Ness/Mc Allister	53	Van Ness/Mc Allister	43	Van Ness/Mc Allister	98%	83%	86%	105%	84%				
8 Bayshore^	8	45	81	Naples/Geneva	46	81	Naples/Geneva	46	Naples/Geneva	56	Naples/Geneva	46	Naples/Geneva	56%	56%	56%	70%	57%	74	81	O Farrell/Stockton	71	81	O															

TRANSIT FLEET NEEDS ASSESSMENT - 2050

This analysis assumes perfect spreading in ridership across the peak period. Ridership represents an average bus during the peak period and is based on CHAMP ridership that has been adjusted using observed, pre-pandemic Muni data.

Notes: Toward Downtown is inbound with the following exceptions.
 * Toward Sunnydale is inbound in all years
 ** Toward Marina is inbound
 *** Toward Richmond District is inbound
 **** Toward Fisherman's Wharf is inbound
 ^ The 8 Bayshore also includes the 8AX and 8BX Bayshore Expresses. In SF-CHAMP the 8 only operates in the countercommute direction, while the 8AX and 8BX only operate in the commute direction
 ^ Toward Presidio is inbound
 ^^ Toward Richmond District is inbound

ATTACHMENT 9

Revised Air Quality Supporting Information (EIR Appendix I)

Text changes to EIR Appendix I, Air Quality Supporting Information have been made to specifically evaluate the cancer risk to workers and to update the PM_{2.5} concentration analysis to consider PM_{2.5} concentrations from construction dust and compliance with the city's dust control ordinance. This updated analysis is presented in a new Appendix I.4. Additionally, Appendix I.3, Tables 13.2, and 15.2 were revised to reflect corrected modeling distances which reduced PM_{2.5} concentration values. The text revisions correct minor errors, clarify, expand, or update the information presented in the draft EIR.

MEMO

Project name **San Francisco Housing Element 2022 Update**
 Project no. **1690017135**
 To **San Francisco Planning Department**
San Francisco, California
 From **Shaena Ulissi**
Rei Zhang
Michael Keinath
 Subject **San Francisco Housing Element 2022 Update Project**
Air Quality and Health Risk Assessment Results for
Building Types

1 Introduction

~~November 15, 2021~~
September 22, 2022

At the request of ICF International, Ramboll US Consulting, Inc. (Ramboll) is conducting a California Environmental Quality Act (CEQA) analysis of criteria air pollutants and precursors and local air quality and health impacts associated with the construction and operation of future developments consistent with the San Francisco Housing Element 2022 Update in San Francisco (referred to hereafter as the housing element update or proposed action) on sensitive receptors. Details on the alternatives, building types, construction assumptions, and operational assumptions are described in the "CEQA Air Quality and Health Risk Methodology" (Ramboll, 2021, referred to hereafter as "Methodology Report"). Additional details on these assumptions are presented in this report.

Ramboll
2200 Powell Street
Suite 700
Emeryville, CA 94608
USA

T +1 510 655 7400
F +1 510 655 9517
<https://ramboll.com>

This technical memorandum presents a brief summary of the methodology, noting any deviations from the Methodology Report, and provides the results for evaluation of air quality and health impacts from construction and operation of potential building types on offsite sensitive receptors. This analysis has been performed to support the Project's CEQA documentation at the request of the San Francisco Planning Department's Environmental Planning Division.

2 Methodology

The purpose of this air quality analysis is to assess potential criteria air pollutant emissions and health risks and hazards that would result from the construction and operation of a range of potential building types consistent with the proposed action; and consistent with the guidelines and methodologies from air quality agencies, specifically: Bay Area Air Quality Management District (air district), California Air Resources Board (CARB), California Office of Environmental Health Hazard Assessment (OEHHA), and USEPA.

The steps conducted in performing this air quality analysis are as follows:

If you require assistance to access all the features of this PDF, please contact Elizabeth White, 628.652.7557,
CPC.HousingElementUpdateEIR@sfgov.org.

- (1) develop emissions inventories for each building type;
- (2) perform air dispersion modeling for pollutant concentrations.

2.1 Building Types Evaluated

Criteria air pollutant (CAP) and toxic air contaminant (TAC) construction and operational emissions resulting from the building types shown in **Table Summary-1** were quantitatively evaluated.

Table Summary-1: Building Types

Building Type	Height (feet)	Assumed Land Use Mix	
		Residential (number of dwelling units)	Commercial/Retail (square feet)
Type 1	590	984	29,500
Type 2	240	495	4,000
Type 3	120	200	3,000
Type 4	85	50	N/A
Type 5	65	29	N/A
Type 6	40	30	N/A

N/A= no applicable land use

These emissions estimates and the health risk assessment are described in more detail below. In addition to the above building types Building Type 7: Accessory Dwelling Units, is evaluated qualitatively.

3 Emissions Inventory Development

As described in the Methodology Report, Ramboll primarily utilized the methodology from the California Emissions Estimator Model (CalEEMod®) version 2020.4.01 to assist in quantifying the criteria pollutant emissions presented in this report for the building types. For the construction emissions inventories, a Python-based tool was used to perform these calculations, while for the operational emissions inventories, CalEEMod® software was run with refinements described in the Methodology Report and below.

3.1 Construction Emissions Inventory

Details of the land use assumptions, construction schedules, equipment lists, and worker, vendor, and hauling trips used to develop the construction emissions inventory and risk assessment were presented in the Methodology Report. Additional tables supporting these calculations are presented in this memorandum. **Table 1** shows the construction on-road mobile emission factors that were used in the analysis; these were developed using the newest version of the California Air Resources Board (CARB) emission factor model, EMFAC2021. Construction was assumed to begin in 2023 for all building types; therefore, emissions presented here would be lower for any buildings constructed in later years when vehicle fleets and off-road equipment continue to become lower-emitting. **Table 2** shows the calculation

¹ California Air Pollution Control Officers Association, California Emissions Estimator Model®, <http://www.CalEEMod.com/>, accessed November 1, 2021.

of architectural coating reactive organic compound (ROG) emissions, which use methodology consistent with CalEEMod®. This includes the architectural coating emissions from interior and exterior paint of buildings as well as parking structure marking; because these are infill projects, parking is assumed to take place within parking garages constructed with concrete and not asphalt lots. Therefore, parking-related emissions are calculated for striping only and not off-gassing.

Tables 3.1 through **3.6** show the detailed uncontrolled CAP emissions from construction of Building Types 1 through 6, respectively. Controlled emissions were quantified assuming the use of Tier 4 Final construction equipment. **Tables 4.1** through **4.6** show the detailed controlled CAP emissions from construction of Building Types 1 through 6, respectively. These table sets show the emissions from each construction activity by phase and year in terms of pounds per year and average pounds per day.

Tables 5 and **6** summarize the uncontrolled and controlled construction emissions by building type and year. As shown in **Tables 5** and **6**, the larger buildings (e.g., building types 1 and 2) are assumed to span a longer time period than the smaller buildings and result in higher total emissions and generally higher average daily emissions.

Type 7 (Accessory Dwelling Units [ADUs]) was not analyzed quantitatively; however, construction of ADUs require less construction equipment than construction of a type 6, 40-foot-tall building (with 30 residential units) and therefore would result in lower emissions than a type 6 building. ADUs can include conversion of existing building space that would require very little construction equipment or ground disturbance and rather would focus on interior renovations; or ADUs can be attached or detached new structures that may require excavation, utility installation, and construction. There are three ADU programs recognized by the city (state program, local program and hybrid program). ADUs under the State program are restricted to a maximum size of 1,000 square feet or 50 percent of the existing primary dwelling unit, whichever is greater; ADUs under the local city program are restricted in size based on available buildable area². Construction of ADUs would release a fraction of the emissions calculated from a type 6 40-foot-tall building with 30 dwelling units that is evaluated here.

The average daily uncontrolled emissions for the maximum year for each building type is summarized below in **Table Summary-2a**, while uncontrolled emissions per dwelling unit is summarized in **Table Summary-2b**.

² San Francisco Planning, State ADU Fact Sheet, https://sfplanning.org/sites/default/files/documents/adu/ADU_programs_comparison_chart.pdf, accessed November 1, 2021.

Table Summary-2a: Uncontrolled Construction Criteria Air Pollutant Emissions

Building Type	Average Daily Construction Emissions for Maximum Year ¹			
	ROG	NOx	PM ₁₀	PM _{2.5}
	lb/day			
1 (590 foot tall building)	54	85	3.8	3.8
2 (240 foot tall building)	30	19	0.62	0.59
3 (120 foot tall building)	14	4.5	0.17	0.16
4 (85 foot tall building)	3.7	3.3	0.14	0.13
5 (65 foot tall building)	2.0	4.5	0.12	0.12
6 (40 foot tall building)	2.1	3.4	0.11	0.11
Notes: 1. Average daily construction emissions for the maximum year depend on the construction schedules for the representative projects described in detail in the Methodology Report. Given variation in representative project construction schedules and equipment, phases may overlap one or more years which may cause higher emissions in the maximum year. Abbreviations: lb – pounds NO _x – nitrogen oxides PM – particulate matter ROG – reactive organic gases				

Table Summary-2b: Uncontrolled Construction Criteria Air Pollutant Emissions per Unit

Building Type	Number of Dwelling Units Assumed per Building Type	Average Per Unit Daily Construction Emissions for Maximum Year			
		ROG	NOx	PM ₁₀	PM _{2.5}
		lb/day			
1 (590 foot tall building)	984	0.05	0.09	0.004	0.004
2 (240 foot tall building)	495	0.06	0.04	0.001	0.001
3 (120 foot tall building)	200	0.07	0.02	0.001	0.001
4 (85 foot tall building)	50	0.07	0.07	0.003	0.003
5 (65 foot tall building)	29	0.07	0.15	0.004	0.004
6 (40 foot tall building)	30	0.07	0.11	0.004	0.004
Abbreviations: lb – pounds NO _x – nitrogen oxides PM – particulate matter ROG – reactive organic gases					

The average daily controlled emissions for the maximum year for each building type is summarized below in **Table Summary-3a**, while controlled emissions per dwelling unit is summarized in **Table Summary-3b**.

Table Summary-3a: Controlled ¹ Construction Criteria Air Pollutant Emissions				
Building Type	Average Daily Construction Emissions for Maximum Year ²			
	ROG	NOx	PM ₁₀	PM _{2.5}
	lb/day			
1 (590 foot tall building)	53	16	0.33	0.33
2 (240 foot tall building)	28	11	0.10	0.09
3 (120 foot tall building)	14	1.5	0.020	0.019
4 (85 foot tall building)	3.5	1.0	0.013	0.013
5 (65 foot tall building)	2.0	2.5	0.024	0.023
6 (40 foot tall building)	1.9	1.3	0.016	0.015
Notes: 1. Note that for the uncontrolled modeling, most equipment is assumed to meet Tier 3 emissions standards by 2023 based on CARB's OFFROAD inventory. 2. Average daily construction emissions for the maximum year depend on the construction schedules for the representative projects described in detail in the Methodology Report. Given variation in representative project construction schedules and equipment, phases may overlap one or more years which may cause higher emissions in the maximum year. Abbreviations: lb – pounds NO _x – nitrogen oxides PM – particulate matter ROG – reactive organic gases				

Table Summary-3b: Controlled Construction Criteria Air Pollutant Emissions per Unit					
Building Type	Number of Dwelling Units Assumed per Building Type	Average Per Unit Daily Construction Emissions for Maximum Year			
		ROG	NOx	PM ₁₀	PM _{2.5}
		lb/day			
1 (590 foot tall building)	984	0.05	0.02	0.0003	0.0003
2 (240 foot tall building)	495	0.06	0.02	0.0002	0.0002
3 (120 foot tall building)	200	0.07	0.01	0.0001	0.0001
4 (85 foot tall building)	50	0.07	0.02	0.0003	0.0003
5 (65 foot tall building)	29	0.07	0.09	0.0008	0.0008
6 (40 foot tall building)	30	0.06	0.04	0.0005	0.0005

Abbreviations:

lb – pounds
NO_x – nitrogen oxides

PM – particulate matter
ROG – reactive organic gases

3.2 Proposed Project Operational Emissions Inventory

As described in the Methodology Report, operational emissions were calculated using CalEEMod®, with any additional adjustments for type-specific or site-specific data described in the subsections below.

Table 7 presents the land uses as input into CalEEMod®. Where the Methodology Report provided a range of potential unit numbers, the maximum number of units from each category was selected to conservatively represent potential air quality impacts.

3.2.1 Architectural Coating

Operational architectural coatings account for the reapplication of paint and coatings on interior and exterior surfaces, which result in emissions of VOCs. Architectural coating emissions were estimated for each building type using CalEEMod®. CalEEMod® defaults were used for the coating areas for all land uses and the default coating emission factors from the air district were used. Additionally, the CalEEMod® assumption that 10 percent of surfaces are coated each year was used. Because parking structures are assumed only to have emissions associated with architectural coating and electricity use (and electricity use does not generate CAP emissions), parking structure emissions from reapplication of paints were quantified outside of the CalEEMod® platform with the assumptions listed in **Table 2**.

3.2.2 Consumer Products

Consumer product emissions come from various non-industrial solvents, including cleaning supplies, kitchen aerosols, cosmetics and toiletries, which emit VOCs during their use. The consumer products VOC emission factor was derived using methodology consistent with CalEEMod® but with updated statewide parameters. The CalEEMod® default emissions factor assumes 2008 statewide VOC inventory and building square footage. An updated VOC inventory for 2017 was taken from the ARB, and 2017 population estimates based on the State of California's Department of Finance demographic projections were used to estimate a statewide VOC emission factor for 2017. This calculation is shown in **Table 8**. The emission factor for the parking area is the default value from the CalEEMod® User's Guide.

3.2.3 Hearths

San Francisco enacted a natural gas ban ordinance that goes into effect in 2021. All buildings constructed in the future will need to comply with the ordinance. Therefore, future housing will be prohibited from having hearths.³

3.2.4 Energy Use

CAP emissions are generated from buildings as a result of activities for which natural gas are typically used as energy sources (such as space/water heating or cooking). Combustion of any type of fuel, including natural gas, emits CAPs directly into the atmosphere; these emissions are considered direct emissions associated with a building. As described above, no natural gas is assumed to be used; therefore, energy use-related CAP emissions associated with each building type are zero.

³ San Francisco Planning and San Francisco County Transportation Authority, San Francisco Building Inspection Commission Codes, https://codelibrary.amlegal.com/codes/san_francisco/latest/sf_building/0-0-0-91622, accessed November 1, 2021.

3.2.5 On-road Mobile Sources

Building type-specific vehicle trip rates were calculated using the SF Travel Demand Model.⁴ The vehicle trip generation is based on place-type, which changes depending on location in the city. San Francisco Planning Department provided the trip generation for the building typologies based on the type characteristics (number of units and square footage of other uses) and address for each example project (e.g., using 10 South Van Ness address for the 590-foot-tall building type). The 85-foot-tall building type is not based on an example project so San Francisco Planning Department conservatively ran the model assuming a place type that is likely to result in higher vehicle trips (e.g., Sunset Neighborhood). These trip generation outputs for the building types are included as **Appendix A**.

To convert this data for use in CalEEMod®, the total person-trips were converted into vehicle trips by dividing by the average vehicle occupancy for the place type and multiplying by the mode share for car and taxis. Total vehicle trips were then divided by the number of units assumed for the building type from **Table 7** to derive trips per unit. Trip rates are shown in **Table 9**. CalEEMod® default trip lengths and trip types were used; because CalEEMod® average trip lengths are from California Household Travel Survey (CHTS) data, which is also used in the more detailed Citywide traffic model (SF-CHAMP), use of CHTS data is expected to be a good representation of trip lengths.

CalEEMod® methodology estimates mobile CAP emissions from running, idling, and starting exhaust, evaporative emissions (running loss, resting loss, hot soak, and diurnal), brakewear, and tirewear for the projected vehicle fleet in a given calendar year and county. Emission factors were obtained from ARB's EMFAC2021 for San Francisco County and are summarized in **Table 10**. In addition, Ramboll estimated entrained roadway dust consistent with CalEEMod® methodology but incorporating ARB's newest Entrained Roadway Dust methodology.⁵ The calculation for the revised silt loading factor is shown in the Methodology Report.

3.2.6 Stationary Sources

Operation of emergency diesel generators results in direct emissions of CAPs and TACs. Building Types 1, 2, and 3 may include emergency generators for life safety requirements. Therefore, emissions were calculated using the parameters described in the Methodology Report. Since all generators are greater than 1,000 horsepower, all were modeled assuming they meet the Tier 4 Final standards consistent with air district requirements.^{6,7} To account for the possibility that a type 3 building may install a generator that is below the air district size that requires Tier 4 Final standards, an uncontrolled scenario was also evaluated that assumed the use of a Tier 2 generator. Emissions are shown in **Table 11**.

3.2.7 Summary of Operational Emissions Inventory

Annual average and daily operational CAP emissions by emissions source (area, energy, mobile and stationary [generator]) are presented for each building type in **Table 12**. **Table Summary-3a** summarizes the total emissions for each building type. **Table Summary-3b** summarizes the total per unit emissions for each building type. As shown in these tables, while total emissions are higher for the

⁴ San Francisco Travel Demand Tool, <https://sftraveldemand.sfcta.org/>, accessed November 1, 2021.

⁵ CARB, Miscellaneous Processes Methodologies - Paved Entrained Road Dust, https://www3.arb.ca.gov/ei/areasrc/fullpdf/2021_paved_roads_7_9.pdf, accessed November 1, 2021.

⁶ BAAQMD, Revised BACT Guideline for Diesel Backup Generators >1000 BHP, https://www.baaqmd.gov/~media/files/engineering/backup-diesel-generators/faq_bact_for_large_diesel-pdf.pdf?la=en, accessed November 1, 2021.

⁷ BAAQMD, BACT Guideline, <https://www.baaqmd.gov/~media/files/engineering/bact-tbact-workshop/combustion/96-1-5.pdf?la=en>, accessed November 1, 2021.

larger building types than the smaller types, per-unit emissions are similar across all units. Variations in ROG emissions per unit arise from differences in total structure areas (including parking) that require architectural coating; while differences in NO_x, PM₁₀, and PM_{2.5} arise from different vehicle trip rates associated with each building type and its place type. For example, Building Type 3 (120-foot-tall building with 200 dwelling units) is located in an urban medium density place type, resulting in 813 daily vehicle trips whereas Building Type 2 (240-foot-tall building with 495 dwelling units) is located in an urban high density place type, resulting in 714 daily vehicle trips. The variation in number of units, number of bedrooms per unit, and place type ultimately result in 99 more daily vehicle trips generated by a type 3 building than a type 2 building even though the type 2 building contains 295 more dwelling units than the type 3 building. As shown in **Table Summary-3a**, the differences in overall mass emissions, while minor, do indicate slightly higher emissions occurring from a type 3 building than a type 2 building (taller and higher density than a type 3 building).

Building type 7 (ADUs) were not analyzed quantitatively; however, given that construction of ADUs do not require provision of additional car parking and that ADUs are size-restricted and must follow San Francisco Planning codes,⁸ their operational emissions would be much less than the operational emissions of building type 6 (40-foot-tall building with 30 dwelling units).

⁸ SF Planning, ADU Handbook, https://sfplanning.org/sites/default/files/resources/2019-01/ADU_Handbook.pdf, accessed November 1, 2021.

Table Summary-3a: Operational Emissions

Building Type	Total Annual Operational Emissions			
	ROG	NO _x	PM ₁₀	PM _{2.5}
	ton/year			
1 (590 foot tall building)	4.3	0.80	0.77	0.23
2 (240 foot tall building)	2.2	0.42	0.39	0.12
3 (120 foot tall building, Uncontrolled)	1.1	0.64	0.45	0.13
3 (120 foot tall building, Controlled)	1.1	0.43	0.44	0.12
4 (85 foot tall building)	0.22	0.046	0.049	0.014
5 (65 foot tall building)	0.13	0.028	0.030	0.0088
6 (40 foot tall building)	0.14	0.028	0.030	0.0088
Building Type	Average Daily Operational Emissions			
	ROG	NO _x	PM ₁₀	PM _{2.5}
	lb/day			
1 (590 foot tall building)	23	4.4	4.2	1.3
2 (240 foot tall building)	12	2.3	2.1	0.65
3 (120 foot tall building, Uncontrolled)	5.9	3.5	2.5	0.71
3 (120 foot tall building, Controlled)	5.9	2.4	2.4	0.68
4 (85 foot tall building)	1.2	0.25	0.27	0.079
5 (65 foot tall building)	0.72	0.15	0.17	0.048
6 (40 foot tall building)	0.74	0.15	0.17	0.048
Abbreviations: lb – pounds NO _x – nitrogen oxides PM – particulate matter ROG – reactive organic gases				

Table Summary-3b: Operational Emissions per Unit

Building Type	Number of Dwelling Units Assumed per Building Type	Total Per Unit Annual Operational Emissions			
		ROG	NOx	PM ₁₀	PM _{2.5}
		ton/year			
1 (590 foot tall building)	984	0.0043	0.0008	0.0008	0.0002
2 (240 foot tall building)	495	0.0044	0.0009	0.0008	0.0002
3 (120 foot tall building, Uncontrolled)	200	0.0054	0.0032	0.0023	0.0007
3 (120 foot tall building, Controlled)	200	0.0054	0.0021	0.0022	0.0006
4 (85 foot tall building)	50	0.0045	0.0009	0.0010	0.0003
5 (65 foot tall building)	29	0.0045	0.0010	0.0010	0.0003
6 (40 foot tall building)	30	0.0045	0.0009	0.0010	0.0003
Building Type	Number of Dwelling Units Assumed per Building Type	Average Per Unit Daily Operational Emissions			
		ROG	NOx	PM ₁₀	PM _{2.5}
		lb/day			
1 (590 foot tall building)	984	0.02	0.004	0.004	0.001
2 (240 foot tall building)	495	0.02	0.005	0.004	0.001
3 (120 foot tall building, Uncontrolled)	200	0.03	0.018	0.012	0.004
3 (120 foot tall building, Controlled)	200	0.03	0.012	0.012	0.003
4 (85 foot tall building)	50	0.02	0.005	0.005	0.002
5 (65 foot tall building)	29	0.02	0.005	0.006	0.002
6 (40 foot tall building)	30	0.02	0.005	0.006	0.002
Abbreviations: lb – pounds NO _x – nitrogen oxides PM – particulate matter ROG – reactive organic gases					

4 Health Risk Assessment

The purpose of the human health risk assessment (HRA) is to analyze potential health impacts that would result from construction and operation of building types that could be constructed in the future. The HRA in this report evaluates the estimated cancer risk and fine particulate matter (PM_{2.5}) concentration associated with construction and operation of each building type. The methodology for the health risk assessment used is detailed in the Methodology Report.

4.1 Construction Refined Health Risk Assessment

As described in the Methodology Report, Ramboll performed refined air dispersion modeling using the American Meteorological Society/USEPA Regulatory Model Improvement Committee Model (AERMOD) (version 21112), with representative meteorological data to determine DPM and PM_{2.5} concentrations for potentially exposed individuals. These concentrations were used to assess the potential human health risk. **Appendix B** contains all AERMOD input files, meteorological data, and consolidated output files. A summary of the results of the construction HRA are presented below.

Emission rates were calculated using the emissions inventory described for construction in Section 3.1.1. Emissions were divided by phase and year, and emissions within 500 meters (1,640 feet) of each construction site from haul trucks were conservatively evaluated as onsite emissions. These emission rates are shown in **Appendix B**. A controlled scenario was also evaluated that assumed the use of all Tier 4 Final construction off-road equipment.

Exposure parameters were developed to determine annual inhalation factors for purpose of the construction HRA (where emissions vary by construction year). These are presented in the Methodology Report.

Maximum cancer risk and PM_{2.5} concentration by distance from construction of each building type are shown in **Tables 13.1** through **13.6** for building types 1 through 6, respectively. These tables also show the controlled cancer risk and PM_{2.5} concentrations, which are substantially lower than the uncontrolled cancer risk and PM_{2.5} concentrations. **Figure 1** shows the maximum uncontrolled cancer risk by distance; this illustrates that the cancer risk peaks near the construction boundary and declines with increasing distance. **Figure 2** shows the maximum controlled risk by distance. As described in section 3.1.1, construction emissions would be much lower for type 7 (ADUs) than types 5 or 6; therefore, risks would also be lower.

Construction of the larger building types generally results in higher cancer risk and PM_{2.5} concentrations than smaller building types due to the larger amount of equipment use. However, health impacts are also affected by the construction lot acreage. If total emissions were identical, construction on a 1-acre lot would result in lower health risks near the construction boundary than construction on a 0.25-acre lot; as emissions would be more concentrated on the smaller lot. A 1-acre lot is roughly 200 feet by 200 feet, and emissions would occur throughout that area including the center. The construction boundary and what this analysis modeled as the nearest offsite receptor would be over 100 feet away from those emissions at the center of the 1-acre construction site; whereas a 0.25-acre lot is roughly 100 feet by 100 feet, and the nearest offsite receptor as modeled would be just 50 feet away from the center of construction.

4.2 Operational Refined Health Risk Assessment

Consistent with the air district and Cal/EPA OEHHA guidance described in the Methodology Report, Ramboll performed a refined HRA for operational sources of TACs that could be included in building types 1, 2, and 3, namely emergency diesel generators. As discussed in the Methodology Report, the operational refined health risk assessment uses a screening size of 5,000 vehicle trips for determining whether to conduct dispersion modeling of traffic-related health risks from building types. This screening size is derived from BAAQMD recommendations and updated OEHHA health risk methodology. Building Type 1 would result in the greatest number of daily vehicle trips, at 1,459 (average daily including weekends, per CalEEMod® methodology). This is well below the daily 5,000-vehicle trip screening size. However, the Citywide traffic modeling will separately evaluate health risk associated with the changes in traffic due to the housing element and alternative(s) and will be detailed in a separate memorandum.

4.3 Emergency Generators

Health risks from emergency generators that could be included in building types 1, 2, and 3 were calculated using the same overall methodology as the construction risks, except those sources were modeled as point sources and emissions were those described above in Section 3.1.2. As a conservative approach, risks at the maximally exposed receptor by distance from emergency generators are calculated starting over at the third trimester for a 30-year duration.

Maximum cancer risk and PM_{2.5} concentration by distance from generators are shown in **Tables 14.1, 14.2, and 14.3** for building types 1, 2, and 3, respectively. For type 3, both the uncontrolled and controlled risks are evaluated, where the controlled risk assumes use of a Tier 4 generator while the uncontrolled risk assumes a Tier 2 generator. **Figure 3** shows the maximum risk by distance.

4.4 Combined Refined Health Risk Assessment

Building types 1, 2, and 3 may result in both construction and operational emergency generator health risks. **Tables 15.1, 15.2, and 15.3** show the combined construction plus operational maximum cancer risk and PM_{2.5} concentration by distance from the construction boundaries, respectively. Several conservative assumptions are included in this analysis. If health risks from emergency generator operations here are summed with health risks from building construction, total risk will be overestimated because the earliest exposure parameters will be repeated and because the maximum exposed receptor location may differ between construction activities and generator emissions. In addition, the emergency generator may not be located at ground-level on the site boundary on the side of the site closest to the maximum exposed receptor.

TABLES

Table 1
Emission Factors for On-Road Construction Mobile Sources
San Francisco Housing Element
San Francisco, California

Parameter	Value
Fleet Mix	Worker: LDA, LDT1, LDT2
	Vendor: MHDT
	Hauling: HHDT
Emission Factor	EMFAC2021 Web Database for San Francisco County, 2023 through 2029, Annual, Aggregated model years and speeds

Abbreviations:

LDA - light duty auto

LDT - light duty truck

MHDT - medium heavy duty truck

HHDT - heavy heavy duty truck

References:

California Air Resources Board (ARB) 2021. EMFAC2021. Available at:
<https://arb.ca.gov/emfac/emissions-inventory/>

Table 2
Estimated Emissions from Construction Architectural Coating Off-Gassing
San Francisco Housing Element
San Francisco, California

Building Type	Parking Facility	Land Use Subtype	Parking Capacity (spaces)	Asphalt-Paved Area (sqft) ¹
Building Type 1: 590 ft tall residential/mixed use	2 levels of below-grade garage	Enclosed Parking with Elevator	518	102,000
Building Type 2: 240 ft tall primarily residential building	3 below-grade parking levels	Enclosed Parking with Elevator	178	71,200
Building Type 3: 120 ft tall primarily residential building	1 level underground enclosed parking	Enclosed Parking with Elevator	69	24,000
Building Type 4: 85 ft tall residential building	Scaled based on Type 5	Enclosed Parking with Elevator	98	39,200
Building Type 5: 66/65 ft tall primarily residential building	2 levels of below-grade garage	Enclosed Parking with Elevator	57	22,800
Building Type 6: 40 ft tall building	1 level of below-grade parking	Enclosed Parking with Elevator	39	15,600

Inputs^{1,2}

Parameter		Input	Units
Residential Surface Area to Floor Area Ratio		2.7	--
Non-Residential Surface Area to Floor Area Ratio		2.0	
Painted Area in Parking Structures		6%	--
Application Rate		100%	--
Reapplication Rate		10%	--
Fraction of Surface Area	Interior Surfaces	25%	--
	Exterior Shell	75%	--
Indoor Paint VOC Content		100	g/L
Outdoor and Parking Paint VOC Content		150	g/L

Table 2
Estimated Emissions from Construction Architectural Coating Off-Gassing
San Francisco Housing Element
San Francisco, California

Emissions

Type	Land Use	CalEEMod® Land Use	Square Footage ² (square feet)	Surface Area ² (square feet)	Architectural Coating Construction VOC emissions ³ (lb/yr)	Architectural Coating Operational VOC emissions ³ (lb/yr)
Building Type 1: 590 ft tall residential/mixed use	Residential	Apartment high rise	935,745	2,526,512	16,106	1,611
	Retail	Strip Mall	30,350	60,700	387	39
	Parking Structure	--	102,000	102,000	43	4.3
Building Type 2: 240 ft tall primarily residential building	Residential	Apartment high rise	495,000	1,336,500	8,520	852
	Retail	Strip Mall	4,000	8,000	51	5.1
	Parking Structure	--	71,200	71,200	30	3.0
Building Type 3: 120 ft tall primarily residential building	Residential	Apartment high rise	200,000	540,000	3,442	344
	Retail	Strip Mall	3,000	6,000	38	3.8
	Parking Structure	--	24,000	24,000	10	1.0
Building Type 4: 85 ft tall residential building	Residential	Apartment mid rise	50,000	135,000	861	86
	Parking Structure	--	39,200	39,200	16	1.6
Building Type 5: 66/65 ft tall primarily residential building	Residential	Apartment mid rise	29,000	78,300	499	50
	Parking Structure	--	22,800	22,800	10	1.0
Building Type 6: 40 ft tall building	Residential	Apartment mid rise	30,000	81,000	516	52
	Parking Structure	--	15,600	15,600	6.5	0.65

Notes:

- Inputs and assumptions are consistent with CalEEMod® 2020.4.0 for San Francisco
- Building type square footage is based on Methodology Report. Residential building surface area assumed to be 2.7 times the square footage and non-residential square footage is assumed to be 2.0 times the square footage, consistent with CalEEMod® Appendix A.
- Calculated based on CalEEMod® Appendix A assumption that 1 gallon of paint covers 180 square feet and that building area is assumed to be 75% indoors and 25% outdoors. The percent of parking lot area assumed to be painted is 6%.

Abbreviations:

CalEEMod® - California Emissions Estimator Model
EF - Emission Factor
g - grams

L - liter
lb/yr - pounds per year
VOC - Volatile Organic Compound

References:

California Air Pollution Control Officers Association (CAPCOA). California Emissions Estimator Model (CalEEMod), 2021. Available online at <http://www.caleemod.com/>

Table 3.1
Estimated Uncontrolled Emissions from Construction for Type 1
San Francisco Housing Element
San Francisco, California

Summary of Construction Emissions by Source

Building Type	Construction Activity	Year	Source	Total Construction Emissions ¹			
				ROG	NOx	PM ₁₀	PM _{2.5}
				lb/yr			
Type 1	Demolition	2023	On-Site Exhaust	101	804	40	38
			Mobile Exhaust	13.7	83	0.66	0.62
	Grading, Shoring, & Excavation	2023	On-Site Exhaust	2,273	19,234	919	912
			Mobile Exhaust	68	750	5.2	5.0
	Foundation/Podium Construction	2023	On-Site Exhaust	40	374	23	21
			Mobile Exhaust	105	768	5.8	5.5
		2024	On-Site Exhaust	12	117	6.8	6.2
			Mobile Exhaust	33.7	244	1.9	1.8
	Building Construction/Superstructure	2024	On-Site Exhaust	55	517	30	27
			Mobile Exhaust	416	1265	12.8	12.0
	Superstructure/Skin	2024	On-Site Exhaust	6.1	57	3.3	3.1
			Mobile Exhaust	16.5	120	0.93	0.88
		2025	On-Site Exhaust	23	217	12	11
			Mobile Exhaust	64.0	455	3.7	3.5
	Interior Work	2024	On-Site Exhaust	6.3	42	2.1	2.1
			Mobile Exhaust	53.1	109	1.32	1.23
			Architectural Coating	1,097	--	--	--
		2025	On-Site Exhaust	71	478	21	21
			Mobile Exhaust	609	1217	15.2	14.2
			Architectural Coating	13,203	--	--	--
		2026	On-Site Exhaust	12	81	3.6	3.6
			Mobile Exhaust	98.3	192	2.47	2.30
			Architectural Coating	2,236	--	--	--

Table 3.1
Estimated Uncontrolled Emissions from Construction for Type 1
San Francisco Housing Element
San Francisco, California

Summary of Construction Emissions by Year

Year	Average Daily CAP Emissions ²			
	ROG	NOx	PM ₁₀	PM _{2.5}
	lb/day			
2023	10.0	85	3.8	3.8
2024	6.5	9.5	0.23	0.21
2025	54	9.1	0.20	0.19
2026	9.0	1.05	0.023	0.023

Notes:

- ¹. Construction emissions were estimated with methodology equivalent to CalEEMod® 2020.4.0. On-Site Exhaust represents emissions from offroad equipment, while mobile exhaust includes emissions from worker, vendor, and hauling trucks.
- ². Daily emissions are conservatively averaged over 260 days (one calendar year, not including weekends).

Abbreviations:

CalEEMod® - California Emissions Estimator Model®
CAP - Criteria Air Pollutants
NOx - nitrogen oxides

PM₁₀ - particulate matter less than 10 microns
PM_{2.5} - particulate matter less than 2.5 microns
ROG - reactive organic gases

Reference:

California Emissions Estimator Model (CalEEMod). 2021. CAPCOA. Available online at: <http://www.caleemod.com>

Table 3.2
Estimated Uncontrolled Emissions from Construction for Type 2
San Francisco Housing Element
San Francisco, California

Summary of Construction Emissions by Source

Building Type	Construction Activity	Year	Source	Total Construction Emissions ¹			
				ROG	NOx	PM ₁₀	PM _{2.5}
				lb/yr			
Type 2	Site Preparation/Demolition	2023	On-Site Exhaust	24	174	6.7	6.1
			Mobile Exhaust	7.8	410	2.5	2.4
	Excavation Shoring	2023	On-Site Exhaust	79	642	24	23
			Mobile Exhaust	23	960	6.1	5.8
	Foundation/Below Grade Construction	2023	On-Site Exhaust	16	124	4.0	3.7
			Mobile Exhaust	5.9	14	0.17	0.16
	Building Construction	2023	On-Site Exhaust	269	2,285	81	77
			Mobile Exhaust	174	153	3.1	2.8
		2024	On-Site Exhaust	446	3,807	128	120
			Mobile Exhaust	287	244	5.1	4.7
		2025	On-Site Exhaust	388	3,295	105	99
			Mobile Exhaust	251	207	4.4	4.1
	Exterior Finishing	2024	On-Site Exhaust	35	261	11	11
			Mobile Exhaust	42	34	0.73	0.67
			Architectural Coating	1,827	--	--	--
		2025	On-Site Exhaust	123	922	35	34
			Mobile Exhaust	147	118	2.6	2.4
			Architectural Coating	6,774	--	--	--
	Site Work/Paving	2025	On-Site Exhaust	36	302	14	13
			Mobile Exhaust	7.2	4.8	0.12	0.11

Table 3.2
Estimated Uncontrolled Emissions from Construction for Type 2
San Francisco Housing Element
San Francisco, California

Summary of Construction Emissions by Year

Year	Average Daily CAP Emissions ²			
	ROG	NOx	PM ₁₀	PM _{2.5}
	lb/day			
2023	2.3	18	0.49	0.46
2024	10	17	0.56	0.52
2025	30	19	0.62	0.59

Notes:

- ¹. Construction emissions were estimated with methodology equivalent to CalEEMod® 2020.4.0. On-Site Exhaust represents emissions from offroad equipment, while mobile exhaust includes emissions from worker, vendor, and hauling trucks.
- ². Daily emissions are conservatively averaged over 260 days (one calendar year, not including weekends).

Abbreviations:

CalEEMod® - California Emissions Estimator Model®
CAP - Criteria Air Pollutants
NOx - nitrogen oxides

PM₁₀ - particulate matter less than 10 microns
PM_{2.5} - particulate matter less than 2.5 microns
ROG - reactive organic gases

Reference:

California Emissions Estimator Model (CalEEMod). 2021. CAPCOA. Available online at: <http://www.caleemod.com>

Table 3.3
Estimated Uncontrolled Emissions from Construction for Type 3
San Francisco Housing Element
San Francisco, California

Summary of Construction Emissions by Source

Building Type	Construction Activity	Year	Source	Total Construction Emissions ¹			
				ROG	NOx	PM ₁₀	PM _{2.5}
				lb/yr			
Type 3	Demolition	2023	On-Site Exhaust	15	140	6.8	6.4
			Mobile Exhaust	0.64	0.46	0.010	0.010
	Site Preparation	2023	On-Site Exhaust	1.1	12	0.45	0.42
			Mobile Exhaust	0.13	6.3	0.039	0.037
	Grading	2023	On-Site Exhaust	2.9	27	1.3	1.2
			Mobile Exhaust	3.1	198	1.2	1.1
	Building Construction	2023	On-Site Exhaust	65	661	33	30
			Mobile Exhaust	58	115	1.5	1.4
		2024	On-Site Exhaust	65	648	31	28
			Mobile Exhaust	57	112	1.5	1.4
	Paving	2024	On-Site Exhaust	6.8	61	2.8	2.7
			Mobile Exhaust	0.53	0.37	0.0087	0.0080
	Architectural Coating	2024	On-Site Exhaust	1.9	13	0.64	0.64
			Mobile Exhaust	1.0	0.71	0.017	0.016
			Architectural Coating	3,491	--	--	--

Table 3.3
Estimated Uncontrolled Emissions from Construction for Type 3
San Francisco Housing Element
San Francisco, California

Summary of Construction Emissions by Year

Year	Average Daily CAP Emissions ²			
	ROG	NOx	PM ₁₀	PM _{2.5}
	lb/day			
2023	0.56	4.5	0.17	0.16
2024	14	3.2	0.14	0.13

Notes:

- ¹. Construction emissions were estimated with methodology equivalent to CalEEMod® 2020.4.0. On-Site Exhaust represents emissions from offroad equipment, while mobile exhaust includes emissions from worker, vendor, and hauling trucks.
- ². Daily emissions are conservatively averaged over 260 days (one calendar year, not including weekends).

Abbreviations:

CalEEMod® - California Emissions Estimator Model®
CAP - Criteria Air Pollutants
NOx - nitrogen oxides

PM₁₀ - particulate matter less than 10 microns
PM_{2.5} - particulate matter less than 2.5 microns
ROG - reactive organic gases

Reference:

California Emissions Estimator Model (CalEEMod). 2021. CAPCOA. Available online at: <http://www.caleemod.com>

Table 3.4
Estimated Uncontrolled Emissions from Construction for Type 4
San Francisco Housing Element
San Francisco, California

Summary of Construction Emissions by Source

Building Type	Construction Activity	Year	Source	Total Construction Emissions ¹			
				ROG	NOx	PM ₁₀	PM _{2.5}
				lb/yr			
Type 4	Demolition	2023	On-Site Exhaust	6.6	60	2.9	2.8
			Mobile Exhaust	0.71	0.51	0.012	0.011
	Site Preparation	2023	On-Site Exhaust	0.53	6.2	0.23	0.21
			Mobile Exhaust	0.048	0.035	7.9E-04	7.3E-04
	Grading	2023	On-Site Exhaust	1.5	13	0.64	0.61
			Mobile Exhaust	2.4	149	0.91	0.87
	Building Construction	2023	On-Site Exhaust	56	568	28	26
			Mobile Exhaust	21	39	0.52	0.49
	Paving	2023	On-Site Exhaust	3.0	28	1.3	1.2
			Mobile Exhaust	0.35	0.25	0.0058	0.0053
	Architectural Coating	2023	On-Site Exhaust	0.86	5.9	0.32	0.32
			Mobile Exhaust	0.19	0.14	0.0031	0.0029
			Architectural Coating	877	--	--	--

Table 3.4
Estimated Uncontrolled Emissions from Construction for Type 4
San Francisco Housing Element
San Francisco, California

Summary of Construction Emissions by Year

Year	Average Daily CAP Emissions ²			
	ROG	NOx	PM ₁₀	PM _{2.5}
	lb/day			
2023	3.7	3.3	0.14	0.13

Notes:

- ¹. Construction emissions were estimated with methodology equivalent to CalEEMod® 2020.4.0. On-Site Exhaust represents emissions from offroad equipment, while mobile exhaust includes emissions from worker, vendor, and hauling trucks.
- ². Daily emissions are conservatively averaged over 260 days (one calendar year, not including weekends).

Abbreviations:

CalEEMod® - California Emissions Estimator Model®
CAP - Criteria Air Pollutants
NOx - nitrogen oxides

PM₁₀ - particulate matter less than 10 microns
PM_{2.5} - particulate matter less than 2.5 microns
ROG - reactive organic gases

Reference:

California Emissions Estimator Model (CalEEMod). 2021. CAPCOA. Available online at: <http://www.caleemod.com>

Table 3.5
Estimated Uncontrolled Emissions from Construction for Type 5
San Francisco Housing Element
San Francisco, California

Summary of Construction Emissions by Source

Building Type	Construction Activity	Year	Source	Total Construction Emissions ¹			
				ROG	NOx	PM ₁₀	PM _{2.5}
				lb/yr			
Type 5	Demolition	2023	On-Site Exhaust	24	214	9.4	9.0
			Mobile Exhaust	10	303	1.9	1.8
	Site Preparation & Grading	2023	On-Site Exhaust	13	100	4.8	4.6
			Mobile Exhaust	2.5	1.8	0.041	0.038
	Excavation & Shoring	2023	On-Site Exhaust	11	97	4.0	3.8
			Mobile Exhaust	7.2	164	1.1	1.0
	Drainage/Utilities/Subgrade	2023	On-Site Exhaust	5.6	51	3.0	2.8
			Mobile Exhaust	9.0	6.5	0.15	0.14
	Building Construction	2023	On-Site Exhaust	19	165	7.0	6.6
			Mobile Exhaust	31	63	0.81	0.76
		2024	On-Site Exhaust	1.5	13	0.54	0.50
			Mobile Exhaust	2.5	5.0	0.065	0.060
	Sitework	2024	On-Site Exhaust	10	88	3.9	3.8
			Mobile Exhaust	7.4	98	0.69	0.66
			Architectural Coating	509	--	--	--

Table 3.5
Estimated Uncontrolled Emissions from Construction for Type 5
San Francisco Housing Element
San Francisco, California

Summary of Construction Emissions by Year

Year	Average Daily CAP Emissions ²			
	ROG	NOx	PM ₁₀	PM _{2.5}
	lb/day			
2023	0.50	4.5	0.12	0.12
2024	2.0	0.79	0.020	0.019

Notes:

- ¹. Construction emissions were estimated with methodology equivalent to CalEEMod® 2020.4.0. On-Site Exhaust represents emissions from offroad equipment, while mobile exhaust includes emissions from worker, vendor, and hauling trucks.
- ². Daily emissions are conservatively averaged over 260 days (one calendar year, not including weekends).

Abbreviations:

CalEEMod® - California Emissions Estimator Model®
 CAP - Criteria Air Pollutants
 NOx - nitrogen oxides

PM₁₀ - particulate matter less than 10 microns
 PM_{2.5} - particulate matter less than 2.5 microns
 ROG - reactive organic gases

Reference:

California Emissions Estimator Model (CalEEMod). 2021. CAPCOA. Available online at: <http://www.caleemod.com>

Table 3.6
Estimated Uncontrolled Emissions from Construction for Type 6
San Francisco Housing Element
San Francisco, California

Summary of Construction Emissions by Source

Building Type	Construction Activity	Year	Source	Total Construction Emissions ¹			
				ROG	NOx	PM ₁₀	PM _{2.5}
				lb/yr			
Type 6	Demolition	2023	On-Site Exhaust	3.1	24	1.2	1.2
			Mobile Exhaust	0.74	48	0.29	0.28
	Excavation	2023	On-Site Exhaust	24	232	11	10
			Mobile Exhaust	1.4	90	0.55	0.52
	Exterior	2023	On-Site Exhaust	8.7	102	4.0	3.7
	Structure	2023	On-Site Exhaust	1.0	8.8	0.43	0.43
		2024	On-Site Exhaust	0.49	4.1	0.19	0.19
	All	2023	On-Site Exhaust	28	346	13	12
			Mobile Exhaust	24	29	0.49	0.45
			Architectural Coating	453	--	--	--
		2024	On-Site Exhaust	4.1	51	1.8	1.6
			Mobile Exhaust	3.5	4.1	0.070	0.065
			Architectural Coating	70	--	--	--

Table 3.6
Estimated Uncontrolled Emissions from Construction for Type 6
San Francisco Housing Element
San Francisco, California

Summary of Construction Emissions by Year

Year	Average Daily CAP Emissions ²			
	ROG	NOx	PM ₁₀	PM _{2.5}
	lb/day			
2023	2.1	3.4	0.12	0.11
2024	0.30	0.23	0.0079	0.0073

Notes:

- ¹. Construction emissions were estimated with methodology equivalent to CalEEMod® 2020.4.0. On-Site Exhaust represents emissions from offroad equipment, while mobile exhaust includes emissions from worker, vendor, and hauling trucks.
- ². Daily emissions are conservatively averaged over 260 days (one calendar year, not including weekends).

Abbreviations:

CalEEMod® - California Emissions Estimator Model®

CAP - Criteria Air Pollutants

NOx - nitrogen oxides

PM₁₀ - particulate matter less than 10 microns

PM_{2.5} - particulate matter less than 2.5 microns

ROG - reactive organic gases

Reference:

California Emissions Estimator Model (CalEEMod). 2021. CAPCOA. Available online at: <http://www.caleemod.com>

Table 4.1
Estimated Controlled Emissions from Construction for Type 1
San Francisco Housing Element
San Francisco, California

Summary of Construction Emissions by Source

Building Type	Construction Activity	Year	Source	Total Construction Emissions ¹			
				ROG	NOx	PM ₁₀	PM _{2.5}
				lb/yr			
Type 1	Demolition	2023	On-Site Exhaust	25	117	3.3	3.3
			Mobile Exhaust	13.7	83	0.66	0.62
	Grading, Shoring, & Excavation	2023	On-Site Exhaust	522	2,299	69	69
			Mobile Exhaust	68	750	5.2	5.0
	Foundation/Podium Construction	2023	On-Site Exhaust	7.3	32	1.0	1.0
			Mobile Exhaust	105	768	5.8	5.5
		2024	On-Site Exhaust	2.5	11	0.33	0.33
			Mobile Exhaust	33.7	244	1.9	1.8
	Building Construction/Superstructure	2024	On-Site Exhaust	11	48	1.5	1.5
			Mobile Exhaust	416	1265	12.8	12.0
	Superstructure/Skin	2024	On-Site Exhaust	1.2	5.3	0.16	0.16
			Mobile Exhaust	16.5	120	0.93	0.88
		2025	On-Site Exhaust	5.0	22	0.67	0.67
			Mobile Exhaust	64.0	455	3.7	3.5
	Interior Work	2024	On-Site Exhaust	1.0	4.5	0.14	0.14
			Mobile Exhaust	53.1	109	1.32	1.23
			Architectural Coating	1,097	--	--	--
		2025	On-Site Exhaust	12	54	1.7	1.7
			Mobile Exhaust	609	1217	15.2	14.2
			Architectural Coating	13,203	--	--	--
		2026	On-Site Exhaust	2.1	9.1	0.28	0.28
			Mobile Exhaust	98.3	192	2.47	2.30
			Architectural Coating	2,236	--	--	--

Summary of Construction Emissions by Year

Year	Average Daily CAP Emissions ²			
	ROG	NOx	PM ₁₀	PM _{2.5}
	lb/day			
2023	2.8	16	0.33	0.33
2024	6.3	6.9	0.073	0.069
2025	53	6.7	0.082	0.077
2026	9.0	0.77	0.0106	0.0099

Notes:

Table 4.1
Estimated Controlled Emissions from Construction for Type 1
San Francisco Housing Element
San Francisco, California

- ¹. Construction emissions were estimated with methodology equivalent to CalEEMod® 2020.4.0. On-Site Exhaust represents emissions from offroad equipment, while mobile exhaust includes emissions from worker, vendor, and hauling trucks.
- ². Daily emissions are conservatively averaged over 260 days (one calendar year, not including weekends).

Abbreviations:

CalEEMod® - California Emissions Estimator Model®
CAP - Criteria Air Pollutants
NOx - nitrogen oxides

PM₁₀ - particulate matter less than 10 microns
PM_{2.5} - particulate matter less than 2.5 microns
ROG - reactive organic gases

Reference:

California Emissions Estimator Model (CalEEMod). 2021. CAPCOA. Available online at: <http://www.caleemod.com>

Table 4.2
Estimated Controlled Emissions from Construction for Type 2
San Francisco Housing Element
San Francisco, California

Summary of Construction Emissions by Source

Building Type	Construction Activity	Year	Source	Total Construction Emissions ¹			
				ROG	NOx	PM ₁₀	PM _{2.5}
				lb/yr			
Type 2	Site Preparation/Demolition	2023	On-Site Exhaust	7.7	34	1.0	1.0
			Mobile Exhaust	7.8	410	2.5	2.4
	Excavation Shoring	2023	On-Site Exhaust	24	121	3.1	3.1
			Mobile Exhaust	23	960	6.1	5.8
	Foundation/Below Grade Construction	2023	On-Site Exhaust	6.1	44	0.73	0.73
			Mobile Exhaust	5.9	14	0.17	0.16
	Building Construction	2023	On-Site Exhaust	84	1,074	8.2	8.2
			Mobile Exhaust	174	153	3.1	2.8
		2024	On-Site Exhaust	146	1,866	14	14
			Mobile Exhaust	287	244	5.1	4.7
		2025	On-Site Exhaust	134	1,708	13	13
			Mobile Exhaust	251	207	4.4	4.1
	Exterior Finishing	2024	On-Site Exhaust	8.3	113	0.79	0.79
			Mobile Exhaust	42	34	0.73	0.67
			Architectural Coating	1,827	--	--	--
		2025	On-Site Exhaust	30	418	2.9	2.9
			Mobile Exhaust	147	118	2.6	2.4
			Architectural Coating	6,774	--	--	--
	Site Work/Paving	2025	On-Site Exhaust	11	78	1.3	1.3
			Mobile Exhaust	7.2	4.8	0.12	0.11

Table 4.2
Estimated Controlled Emissions from Construction for Type 2
San Francisco Housing Element
San Francisco, California

Summary of Construction Emissions by Year

Year	Average Daily CAP Emissions ²			
	ROG	NOx	PM ₁₀	PM _{2.5}
	lb/day			
2023	1.3	11	0.10	0.093
2024	8.9	8.7	0.080	0.079
2025	28	10	0.094	0.092

Notes:

- ¹. Construction emissions were estimated with methodology equivalent to CalEEMod® 2020.4.0. On-Site Exhaust represents emissions from offroad equipment, while mobile exhaust includes emissions from worker, vendor, and hauling trucks.
- ². Daily emissions are conservatively averaged over 260 days (one calendar year, not including weekends).

Abbreviations:

CalEEMod® - California Emissions Estimator Model®
CAP - Criteria Air Pollutants
NOx - nitrogen oxides

PM₁₀ - particulate matter less than 10 microns
PM_{2.5} - particulate matter less than 2.5 microns
ROG - reactive organic gases

Reference:

California Emissions Estimator Model (CalEEMod). 2021. CAPCOA. Available online at: <http://www.caleemod.com>

Table 4.3
Estimated Controlled Emissions from Construction for Type 3
San Francisco Housing Element
San Francisco, California

Summary of Construction Emissions by Source

Building Type	Construction Activity	Year	Source	Total Construction Emissions ¹			
				ROG	NOx	PM ₁₀	PM _{2.5}
				lb/yr			
Type 3	Demolition	2023	On-Site Exhaust	3.1	13	0.41	0.41
			Mobile Exhaust	0.64	0.46	0.010	0.010
	Site Preparation	2023	On-Site Exhaust	0.24	1.0	0.032	0.032
			Mobile Exhaust	0.13	6.3	0.039	0.037
	Grading	2023	On-Site Exhaust	0.58	2.5	0.078	0.078
			Mobile Exhaust	3.1	198	1.2	1.1
	Building Construction	2023	On-Site Exhaust	14	62	1.9	1.9
			Mobile Exhaust	58	115	1.5	1.4
		2024	On-Site Exhaust	15	66	2.0	2.0
			Mobile Exhaust	57	112	1.5	1.4
	Paving	2024	On-Site Exhaust	1.7	14	0.20	0.20
			Mobile Exhaust	0.53	0.37	0.0087	0.0080
	Architectural Coating	2024	On-Site Exhaust	0.31	1.4	0.042	0.042
			Mobile Exhaust	1.0	0.71	0.017	0.016
			Architectural Coating	3,491	--	--	--

Table 4.3
Estimated Controlled Emissions from Construction for Type 3
San Francisco Housing Element
San Francisco, California

Summary of Construction Emissions by Year

Year	Average Daily CAP Emissions ²			
	ROG	NOx	PM ₁₀	PM _{2.5}
	lb/day			
2023	0.31	1.5	0.020	0.019
2024	14	0.74	0.014	0.014

Notes:

- ¹. Construction emissions were estimated with methodology equivalent to CalEEMod® 2020.4.0. On-Site Exhaust represents emissions from offroad equipment, while mobile exhaust includes emissions from worker, vendor, and hauling trucks.
- ². Daily emissions are conservatively averaged over 260 days (one calendar year, not including weekends).

Abbreviations:

CalEEMod® - California Emissions Estimator Model®
CAP - Criteria Air Pollutants
NOx - nitrogen oxides

PM₁₀ - particulate matter less than 10 microns
PM_{2.5} - particulate matter less than 2.5 microns
ROG - reactive organic gases

Reference:

California Emissions Estimator Model (CalEEMod). 2021. CAPCOA. Available online at: <http://www.caleemod.com>

Table 4.4
Estimated Controlled Emissions from Construction for Type 4
San Francisco Housing Element
San Francisco, California

Summary of Construction Emissions by Source

Building Type	Construction Activity	Year	Source	Total Construction Emissions ¹			
				ROG	NOx	PM ₁₀	PM _{2.5}
				lb/yr			
Type 4	Demolition	2023	On-Site Exhaust	1.3	5.7	0.17	0.17
			Mobile Exhaust	0.71	0.51	0.012	0.011
	Site Preparation	2023	On-Site Exhaust	0.12	0.52	0.016	0.016
			Mobile Exhaust	0.048	0.035	7.9E-04	7.3E-04
	Grading	2023	On-Site Exhaust	0.29	1.3	0.039	0.039
			Mobile Exhaust	2.4	149	0.91	0.87
	Building Construction	2023	On-Site Exhaust	12	54	1.6	1.6
			Mobile Exhaust	21	39	0.52	0.49
	Paving	2023	On-Site Exhaust	0.72	5.8	0.086	0.086
			Mobile Exhaust	0.35	0.25	0.0058	0.0053
	Architectural Coating	2023	On-Site Exhaust	0.13	0.58	0.018	0.018
			Mobile Exhaust	0.19	0.14	0.0031	0.0029
			Architectural Coating	877	--	--	--

Table 4.4
Estimated Controlled Emissions from Construction for Type 4
San Francisco Housing Element
San Francisco, California

Summary of Construction Emissions by Year

Year	Average Daily CAP Emissions ²			
	ROG	NOx	PM ₁₀	PM _{2.5}
	lb/day			
2023	3.5	1.0	0.013	0.013

Notes:

- ¹. Construction emissions were estimated with methodology equivalent to CalEEMod® 2020.4.0. On-Site Exhaust represents emissions from offroad equipment, while mobile exhaust includes emissions from worker, vendor, and hauling trucks.
- ². Daily emissions are conservatively averaged over 260 days (one calendar year, not including weekends).

Abbreviations:

CalEEMod® - California Emissions Estimator Model®
CAP - Criteria Air Pollutants
NOx - nitrogen oxides

PM₁₀ - particulate matter less than 10 microns
PM_{2.5} - particulate matter less than 2.5 microns
ROG - reactive organic gases

Reference:

California Emissions Estimator Model (CalEEMod). 2021. CAPCOA. Available online at: <http://www.caleemod.com>

Table 4.5
Estimated Controlled Emissions from Construction for Type 5
San Francisco Housing Element
San Francisco, California

Summary of Construction Emissions by Source

Building Type	Construction Activity	Year	Source	Total Construction Emissions ¹			
				ROG	NOx	PM ₁₀	PM _{2.5}
				lb/yr			
Type 5	Demolition	2023	On-Site Exhaust	5.2	37	0.64	0.64
			Mobile Exhaust	10	303	1.9	1.8
	Site Preparation & Grading	2023	On-Site Exhaust	2.8	26	0.33	0.33
			Mobile Exhaust	2.5	1.8	0.041	0.038
	Excavation & Shoring	2023	On-Site Exhaust	3.6	21	0.46	0.46
			Mobile Exhaust	7.2	164	1.1	1.0
	Drainage/Utilities/Subgrade	2023	On-Site Exhaust	1.2	5.8	0.16	0.16
			Mobile Exhaust	9.0	6.5	0.15	0.14
	Building Construction	2023	On-Site Exhaust	4.8	35	0.60	0.60
			Mobile Exhaust	31	63	0.81	0.76
		2024	On-Site Exhaust	0.42	3.0	0.051	0.051
			Mobile Exhaust	2.5	5.0	0.065	0.060
	Sitework	2024	On-Site Exhaust	2.5	17	0.31	0.31
			Mobile Exhaust	7.4	98	0.69	0.66
			Architectural Coating	509	--	--	--

Table 4.5
Estimated Controlled Emissions from Construction for Type 5
San Francisco Housing Element
San Francisco, California

Summary of Construction Emissions by Year

Year	Average Daily CAP Emissions ²			
	ROG	NOx	PM ₁₀	PM _{2.5}
	lb/day			
2023	0.30	2.5	0.024	0.023
2024	2.0	0.48	0.0043	0.0041

Notes:

- ¹. Construction emissions were estimated with methodology equivalent to CalEEMod® 2020.4.0. On-Site Exhaust represents emissions from offroad equipment, while mobile exhaust includes emissions from worker, vendor, and hauling trucks.
- ². Daily emissions are conservatively averaged over 260 days (one calendar year, not including weekends).

Abbreviations:

CalEEMod® - California Emissions Estimator Model®
CAP - Criteria Air Pollutants
NOx - nitrogen oxides

PM₁₀ - particulate matter less than 10 microns
PM_{2.5} - particulate matter less than 2.5 microns
ROG - reactive organic gases

Reference:

California Emissions Estimator Model (CalEEMod). 2021. CAPCOA. Available online at: <http://www.caleemod.com>

Table 4.6
Estimated Controlled Emissions from Construction for Type 6
San Francisco Housing Element
San Francisco, California

Summary of Construction Emissions by Source

Building Type	Construction Activity	Year	Source	Total Construction Emissions ¹			
				ROG	NOx	PM ₁₀	PM _{2.5}
				lb/yr			
Type 6	Demolition	2023	On-Site Exhaust	0.80	8.6	0.080	0.080
			Mobile Exhaust	0.74	48	0.29	0.28
	Excavation	2023	On-Site Exhaust	6.9	30	0.92	0.92
			Mobile Exhaust	1.4	90	0.55	0.52
	Exterior	2023	On-Site Exhaust	4.4	56	0.40	0.40
	Structure	2023	On-Site Exhaust	0.21	0.91	0.028	0.028
		2024	On-Site Exhaust	0.11	0.46	0.014	0.014
	All	2023	On-Site Exhaust	11	83	1.3	1.3
			Mobile Exhaust	24	29	0.49	0.45
			Architectural Coating	453	--	--	--
		2024	On-Site Exhaust	1.7	13	0.20	0.20
			Mobile Exhaust	3.5	4.1	0.070	0.065
			Architectural Coating	70	--	--	--

Table 4.6
Estimated Controlled Emissions from Construction for Type 6
San Francisco Housing Element
San Francisco, California

Summary of Construction Emissions by Year

Year	Average Daily CAP Emissions ²			
	ROG	NOx	PM ₁₀	PM _{2.5}
	lb/day			
2023	1.9	1.3	0.016	0.015
2024	0.29	0.067	0.0011	0.0011

Notes:

- ¹. Construction emissions were estimated with methodology equivalent to CalEEMod® 2020.4.0. On-Site Exhaust represents emissions from offroad equipment, while mobile exhaust includes emissions from worker, vendor, and hauling trucks.
- ². Daily emissions are conservatively averaged over 260 days (one calendar year, not including weekends).

Abbreviations:

CalEEMod® - California Emissions Estimator Model®
CAP - Criteria Air Pollutants
NOx - nitrogen oxides

PM₁₀ - particulate matter less than 10 microns
PM_{2.5} - particulate matter less than 2.5 microns
ROG - reactive organic gases

Reference:

California Emissions Estimator Model (CalEEMod). 2021. CAPCOA. Available online at: <http://www.caleemod.com>

Table 5
Summary of Uncontrolled Construction Emissions
San Francisco Housing Element
San Francisco, California

Summary of Construction Emissions by Type

Type	Year	Average Daily Construction Emissions ^{1,2}			
		ROG	NOx	PM ₁₀	PM _{2.5}
		lb/day			
Type 1	2023	10.0	85	3.8	3.8
	2024	6.5	9.5	0.23	0.21
	2025	54	9.1	0.20	0.19
	2026	9.0	1.05	0.02	0.02
Type 2	2023	2.3	18	0.49	0.46
	2024	10	17	0.56	0.52
	2025	30	19	0.62	0.59
Type 3	2023	0.56	4.5	0.17	0.16
	2024	14	3.2	0.14	0.13
Type 4	2023	3.7	3.3	0.14	0.13
Type 5	2023	0.50	4.5	0.12	0.12
	2024	2.0	0.79	0.02	0.02
Type 6	2023	2.1	3.4	0.12	0.11
	2024	0.30	0.23	0.01	0.01

Notes:

- ¹ Construction emissions were estimated with methodology equivalent to CalEEMod® 2020.4.0.
- ² Daily emissions are conservatively averaged over 260 days (one calendar year, not including weekends).

Abbreviations:

CalEEMod® - California Emissions Estimator Model® PM₁₀ - particulate matter less than 10 microns
CAP - Criteria Air Pollutants PM_{2.5} - particulate matter less than 2.5 microns
NOx - nitrogen oxides ROG - reactive organic gases

Reference:

California Emissions Estimator Model (CalEEMod). 2021. CAPCOA. Available online at:
<http://www.caleemod.com>

Table 6
Summary of Controlled Construction Emissions
San Francisco Housing Element
San Francisco, California

Summary of Construction Emissions by Type

Type	Year	Average Daily Construction Emissions ^{1,2}			
		ROG	NOx	PM ₁₀	PM _{2.5}
		lb/day			
Type 1	2023	2.8	16	0.33	0.33
	2024	6.3	6.9	0.073	0.069
	2025	53	6.7	0.082	0.077
	2026	9.0	0.77	0.0106	0.0099
Type 2	2023	1.3	11	0.10	0.093
	2024	8.9	8.7	0.080	0.079
	2025	28	10	0.094	0.092
Type 3	2023	0.31	1.5	0.020	0.019
	2024	14	0.74	0.014	0.014
Type 4	2023	3.5	1.0	0.013	0.013
Type 5	2023	0.30	2.5	0.024	0.023
	2024	2.0	0.48	0.0043	0.0041
Type 6	2023	1.9	1.3	0.016	0.015
	2024	0.29	0.067	0.0011	0.0011

Notes:

- ¹ Construction emissions were estimated with methodology equivalent to CalEEMod® 2020.4.0. The controlled scenario assumes all construction off-road equipment meets Tier 4 Final standards.
- ² Daily emissions are conservatively averaged over 260 days (one calendar year, not including weekends).

Abbreviations:

CalEEMod® - California Emissions Estimator Model® PM₁₀ - particulate matter less than 10 microns
CAP - Criteria Air Pollutants PM_{2.5} - particulate matter less than 2.5 microns
NOx - nitrogen oxides ROG - reactive organic gases

Reference:

California Emissions Estimator Model (CalEEMod). 2021. CAPCOA. Available online at:
<http://www.caleemod.com>

Table 7
Land Uses as Modeled in CalEEMod®
San Francisco Housing Element
San Francisco, California

Type	CalEEMod Analysis ¹			
	Land Use Type	Land Use SubType	Land Use Unit Amount	Land Use Size Metric
Building Type 1: 590 ft tall residential/mixed use	Residential	Apartment high rise	984	units
	Retail	Strip Mall	30.35	ksf
Building Type 2: 240 ft tall primarily residential building	Residential	Apartment high rise	495	units
	Retail	Strip Mall	4	ksf
Building Type 3: 120 ft tall primarily residential building	Residential	Apartment high rise	200	units
	Retail	Strip Mall	3	ksf
Building Type 4: 85 ft tall residential building	Residential	Apartment mid rise	50	units
Building Type 5: 66/65 ft tall primarily residential building	Residential	Apartment mid rise	29	units
Building Type 6: 40 ft tall building	Residential	Apartment mid rise	30	units

Notes:

¹ Land Uses were mapped to representative types in CalEEMod®. Where the Methodology Report provided a range of potential unit sizes, the maximum size from each category was selected to conservatively represent potential air quality impacts. Lot acreage and population were modeled as CalEEMod® defaults because these fields do not affect operational criteria air pollutant emissions. Building Type 1 retail was conservatively modeled as slightly larger than the final type (30.35 compared to 29.5 ksf)

Abbreviations

ft - foot

ksf - thousand square feet

Table 8
Consumer Product Emission Factor Update
San Francisco Housing Element
San Francisco, California

CARB Consumer Products Regulations Since 2008

Year	Proposed VOC Emissions Reductions following Regulatory Amendments (tons/day)	Statewide VOC Emissions from Consumer Products (tons/day)
2013 Inventory ¹	-	205
2010 Amendments effective January 1, 2014 ¹	-5.0	200
2010 Amendments effective January 1, 2015 ¹	-0.20	200
2013 Amendments effective January 1, 2017 ¹	-4.1	196
2017 Inventory (Post Amendment Adjustments)	-	196

Statewide Parameters for Development of 2017 VOC Emission Factor for Consumer Products

Year	Total VOC Inventory (tons/day) ²	California Population ³	Total Building Square Footage ⁴	Consumer Products VOC Emission Factor (lb/square foot/day)	2017 Reduction from CalEEMod® Emission Factor
2008 statewide, from CalEEMod®	240	36,457,375	22,435,267,518	0.0000214	24.1%
2017	196	39,523,613	24,158,505,108	0.0000162	

Notes:

¹ Available at: <http://www.arb.ca.gov/regact/2013/cp2013/cp13isor.pdf>.

² 2008 value from CalEEMod® Users Guide, Appendix E. 2017 value calculated from <http://www.arb.ca.gov/regact/2013/cp2013/cp13isor.pdf>.

³ Population estimates based on State of California, Department of Finance, Estimates. 2017 data available at: <http://www.dof.ca.gov/Forecasting/Demographics/Estimates/E-1/>. 2008 data available at: <http://www.dof.ca.gov/Forecasting/Demographics/Estimates/E-4/2001-10/>.

⁴ 2008 value from CalEEMod® Users Guide, Appendix E. 2017 value calculated by Ramboll using the growth in California population and the 2008 total building square footage.

Abbreviations:

CalEEMod® - California Emissions Model

CARB - California Air Resources Board

lb - pound

VOC - Volatile Organic Compound

Table 9
Estimated Mobile Trip Generation for Each Type
San Francisco Housing Element
San Francisco, California

Category	CalEEMod Inputs						
	Land Use Type	Vehicle Trips LandUse SubType	Vehicle Trips Land Use Size Metric	Quantity	Derived Trip Rate ¹		
					Weekday	Saturday	Sunday
Building Type 1: 590 ft tall residential/mixed use	Residential	Apartment high rise	units	984	1.10	1.12	0.89
	Retail	Strip Mall	ksf	30.35	14.49	13.74	6.68
Building Type 2: 240 ft tall primarily residential building	Residential	Apartment high rise	units	495	1.32	1.34	1.06
	Retail	Strip Mall	ksf	4	14.91	14.14	6.87
Building Type 3: 120 ft tall primarily residential building	Residential	Apartment high rise	units	200	3.85	3.92	3.11
	Retail	Strip Mall	ksf	3	25.59	24.28	11.80
Building Type 4: 85 ft tall residential building	Residential	Apartment mid rise	units	50	1.81	1.63	1.36
Building Type 5: 66/65 ft tall primarily residential building	Residential	Apartment mid rise	units	29	1.93	1.74	1.45
Building Type 6: 40 ft tall building	Residential	Apartment mid rise	units	30	1.86	1.68	1.40

Notes

¹ Type-specific vehicle trip rates were calculated using the SF Travel Demand Model. SFEP provided the trip generation for the building types based on the Type characteristics (number of units and square footage of other uses) and address for each example project (e.g., using 10 South Van Ness address for the 590 foot tall building Type). For building types that aren't based on an example project (e.g., 85 foot tall building), SFEP conservatively ran the model assuming a place type that is likely to result in higher vehicle trips (e.g., Sunset Neighborhood). The Saturday and Sunday trip rates were determined using the CalEEMod default ratio of Saturday to weekday and Sunday to weekday trip rates by land use.

Abbreviations

ft - foot

ksf - thousand square feet

Table 10
Emission Factors for On-Road Operational Mobile Sources
San Francisco Housing Element
San Francisco, California

Year	Pollutant	Emission Factors by Vehicle Category ²												
		LDA	LDT1	LDT2	MDV	LHDT1	LHDT2	MHDT	HHDT	OBUS	UBUS	MCY	SBUS	MH
	Fleet Mix	53%	4.0%	23%	11%	2.8%	0.67%	1.7%	1.2%	0.534%	0.777%	0.55%	0.11%	0.043%
2025	NOX_IDLEX	0	0	0	0	0.029582	0.081893	0.954315	3.948609	0.367311	0	0	0.686784	0
	NOX_RUNEX	0.034758	0.085162	0.052844	0.061591	0.316299	0.540395	1.180494	3.243772	1.209786	0.350904	0.619388	0.437806	1.347309
	NOX_STREX	0.228572	0.335757	0.293565	0.308994	0.469375	0.252024	1.282931	2.710435	1.072269	0.057899	0.139089	0.695167	0.272287
	PM10_IDLEX	0	0	0	0	0.000487	0.001282	0.001630	0.004745	0.000928	0	0	0.000344	0
	PM10_PMBW	0.008642	0.011845	0.011331	0.011204	0.077570	0.090497	0.045472	0.111876	0.048983	0.108292	0.012000	0.044853	0.044943
	PM10_PMTW	0.008000	0.008000	0.008000	0.008000	0.009100	0.010542	0.012000	0.034713	0.012000	0.032485	0.004000	0.009671	0.013285
	PM10_RUNEX	0.001507	0.002099	0.001725	0.001620	0.007749	0.016531	0.010779	0.022858	0.028393	0.006695	0.002401	0.002768	0.022080
	PM10_STREX	0.001933	0.002562	0.002101	0.001950	0.000194	0.000086	0.000108	0.000004	0.000125	0.000024	0.003548	0.000098	0.000374
	PM25_IDLEX	0	0	0	0	0.000466	0.001227	0.001559	0.004533	0.000887	0	0	0.000327	0
	PM25_PMBW	0.003025	0.004146	0.003966	0.003921	0.027149	0.031674	0.015915	0.039157	0.017144	0.037902	0.004200	0.015699	0.015730
	PM25_PMTW	0.002000	0.002000	0.002000	0.002000	0.002275	0.002635	0.003000	0.008678	0.003000	0.008121	0.001000	0.002418	0.003321
	PM25_RUNEX	0.001387	0.001931	0.001587	0.001493	0.007375	0.015798	0.010304	0.021856	0.027156	0.006401	0.002247	0.002622	0.021072
	PM25_STREX	0.001777	0.002356	0.001932	0.001793	0.000179	0.000079	0.000099	0.000004	0.000115	0.000022	0.003340	0.000090	0.000344
	ROG_DIURN	0.270198	0.463415	0.241940	0.244479	0.106369	0.056601	0.029873	0.001095	0.047006	0.012847	1.873348	0.042873	29.938141
	ROG_HTSK	0.083013	0.135824	0.072263	0.071127	0.029644	0.015649	0.007955	0.000325	0.012607	0.004601	3.586659	0.015723	8.887403
	ROG_IDLEX	0	0	0	0	0.023264	0.016290	0.027305	0.254161	0.033976	0	0	0.415046	0
	ROG_RESTL	0	0	0	0	0	0	0	0	0	0	0	0	0
	ROG_RUNEX	0.008787	0.021240	0.010944	0.012950	0.056104	0.087214	0.035832	0.041565	0.073809	0.065799	1.410735	0.013920	0.084458
	ROG_RUNLS	0.026830	0.054748	0.025297	0.023448	0.054372	0.026585	0.018690	0.000331	0.012672	0.000650	1.385584	0.007376	0.001912
	ROG_STREX	0.290161	0.442749	0.340251	0.370462	0.114629	0.059512	0.058858	0.000001	0.068388	0.020052	1.396292	0.048748	0.117287
	SO2_IDLEX	0	0	0	0	0.000082	0.000127	0.001464	0.005710	0.000782	0	0	0	0
	SO2_RUNEX	0.002558	0.003391	0.003501	0.004128	0.007640	0.007925	0.011913	0.015595	0.012829	0.011245	0.002032	0.008742	0.016376
	SO2_STREX	0.000630	0.000825	0.000834	0.000969	0.000200	0.000105	0.000108	0.000002	0.000113	0.000053	0.000486	0.000081	0.000222
	TOG_DIURN	0.270198	0.463415	0.241940	0.244479	0.106369	0.056601	0.029873	0.001095	0.047006	0.012847	1.873348	0.042873	29.938141
	TOG_HTSK	0.083013	0.135824	0.072263	0.071127	0.029644	0.015649	0.007955	0.000325	0.012607	0.004601	3.586659	0.015723	8.887403
	TOG_IDLEX	0	0	0	0	0.033335	0.022161	0.048849	0.681967	0.046501	0	0	0.698450	0
	TOG_RESTL	0	0	0	0	0	0	0	0	0	0	0	0	0
	TOG_RUNEX	0.012792	0.030973	0.015935	0.018798	0.070967	0.101749	0.053041	0.456164	0.096216	0.388652	1.698764	0.177616	0.113004
	TOG_RUNLS	0.026830	0.054748	0.025297	0.023448	0.054372	0.026585	0.018690	0.000331	0.012672	0.000650	1.385584	0.007376	0.001912
	TOG_STREX	0.317690	0.484755	0.372532	0.405609	0.125504	0.065158	0.064442	0.000001	0.074876	0.021954	1.517910	0.053373	0.128415

Notes:

- Emission factor units are consistent with CalEEMod® default units. Emission factors were derived using CalEEMod® methodology. EMFAC2021 revised its ROG/TOG quantification methodology. It no longer outputs specific RUNLOSS outputs but includes these emissions in DIURN; therefore, this input shows zero for RUNLOSS.
- Emission factors were estimated using EMFAC2021 for San Francisco County with EMFAC2007 default vehicle categories and fleet mix assumptions.

Abbreviations

HHDT - heavy-heavy duty truck	MCY - motorcycles	PM ₁₀ - particulate matter less than 10 microns
LDA - light duty autos (passenger gars)	MDV - medium-duty trucks	PM _{2.5} - particulate matter less than 2.5 microns
LDT1 - light duty trucks (lighter weight class)	MH - motor homes	ROG - reactive organic gases
LDT2 - light duty trucks (heavier weight class)	MHDT - medium heavy duty trucks	SBUS - school buses
LHDT1 - light-heavy-duty trucks (lighter weight class NOx - oxides of nitrogen		UBUS - urban buses
LHDT2 - light-heavy-duty trucks (heavier weight clas		

Table 11
Emergency Generator Emissions from Building Operations
San Francisco Housing Element
San Francisco, California

Generator Information

Location	Number of Generators	Engine Control	Size		Fuel Type	Annual Operation ¹
			kW	HP		hr/yr
Building Type 1	1	Tier 4	1,500	2,012	Diesel	50
Building Type 2	2	Tier 4	750	1,006	Diesel	50
Building Type 3 (Uncontrolled)	1	Tier 2	700	939	Diesel	50
Building Type 3 (Controlled)	1	Tier 4	700	939	Diesel	50

Emissions

Annual Emissions ²						
(ton/yr)						
Location	TOG	ROG	NO _x	DPM	PM ₁₀	PM _{2.5}
Building Type 1	0.017	0.017	0.055	0.0022	0.0022	0.0022
Building Type 2	0.017	0.017	0.055	0.0022	0.0022	0.0022
Building Type 3 (Uncontrolled)	0.014	0.013	0.24	0.0078	0.0078	0.0078
Building Type 3 (Controlled)	0.0079	0.0078	0.026	0.0010	0.0010	0.0010

Notes:

1. Operation for routine maintenance and testing is conservatively assumed to be 50 hours per year, the maximum allowable by the Airborne Toxics Control Measure (ATCM) for Stationary Compression Ignition Engines (17 CCR 93115).
2. For the health risk assessment, DPM emissions are converted to emission rates in grams per second.

Abbreviations:

ATCM - Airborne Toxics Control Measure
DPM - diesel particulate matter
g - grams

hp - horsepower
hr - hour
kW - kilowatt
NO_x - oxides of nitrogen

PM - particulate matter
ROG - reactive organic gases
TOG - total organic gases
yr - year

References:

California Air Resources Board. Airborne Toxic Control Measures (ATCM), 17 CCR § 93115. Available online at: <https://www.arb.ca.gov/diesel/documents/FinalReg2011.pdf>

California Building Code, Part 2, Volume 2, Chapter 27 - Electrical. Available online at: <https://up.codes/viewer/california/ca-building-code-2016-v2/chapter/27/electrical#27>.

USEPA. 1995. AP 42, Volume I, Fifth Edition. §3.4. Large Stationary Diesel and All Stationary Dual-Fuel Engines. Available online at: <http://www.epa.gov/ttn/chief/ap42/ch03/final/c03s04.pdf>

Table 12
Summary of Operational Emissions
San Francisco Housing Element
San Francisco, California

Summary of Operational Emissions by Type

Type	Emissions Source	Total Annual Operational Emissions ^{1,2}			
		ROG	NOx	PM ₁₀	PM _{2.5}
		ton/yr			
Type 1	Area ³	3.8	0.084	0.041	0.041
	Energy ⁴	0	0	0	0
	Mobile	0.49	0.66	0.72	0.19
	Generators	0.017	0.055	0.0022	0.0022
	Total	4.3	0.80	0.77	0.23
Type 2	Area ³	1.9	0.042	0.020	0.020
	Energy ⁴	0	0	0	0
	Mobile	0.24	0.33	0.37	0.10
	Generators	0.017	0.055	0.0022	0.0022
	Total	2.2	0.42	0.39	0.12
Type 3	Area ³	0.79	0.017	0.0082	0.0082
	Energy ⁴	0	0	0	0
	Mobile	0.28	0.39	0.44	0.11
	Generators (Uncontrolled)	0.013	0.24	0.0078	0.0078
	Generators (Controlled)	0.0078	0.026	0.0010	0.0010
	Total (Uncontrolled)	1.1	0.64	0.45	0.13
	Total (Controlled)	1.1	0.43	0.44	0.12
Type 4	Area ³	0.20	0.0043	0.0021	0.0021
	Energy ⁴	0	0	0	0
	Mobile	0.029	0.041	0.047	0.012
	Total	0.22	0.046	0.049	0.014
Type 5	Area ³	0.11	0.0025	0.0012	0.0012
	Energy ⁴	0	0	0	0
	Mobile	0.018	0.026	0.029	0.0076
	Total	0.13	0.028	0.030	0.0088
Type 6	Area ³	0.12	0.0026	0.0012	0.0012
	Energy ⁴	0	0	0	0
	Mobile	0.018	0.026	0.029	0.0076
	Total	0.14	0.028	0.030	0.0088

Table 12
Summary of Operational Emissions
San Francisco Housing Element
San Francisco, California

Type	Year	Average Daily Operational Emissions ²			
		ROG	NOx	PM ₁₀	PM _{2.5}
		lb/day			
Type 1	Area ³	21	0.46	0.22	0.22
	Energy ⁴	0	0	0	0
	Mobile	2.7	3.6	4.0	1.0
	Generators	0.091	0.30	0.012	0.012
	Total	23	4.4	4.2	1.3
Type 2	Area ³	11	0.23	0.11	0.11
	Energy ⁴	0	0	0	0
	Mobile	1.3	1.8	2.0	0.53
	Generators	0.091	0.30	0.012	0.012
	Total	12	2.3	2.1	0.65
Type 3	Area ³	4.3	0.094	0.045	0.045
	Energy ⁴	0	0	0	0
	Mobile	1.5	2.1	2.4	0.63
	Generators (Uncontrolled)	0.073	1.3	0.043	0.043
	Generators (Controlled)	0.042	0.14	0.0057	0.0057
	Total (Uncontrolled)	5.9	3.5	2.5	0.71
	Total (Controlled)	5.9	2.4	2.4	0.68
Type 4	Area ³	1.1	0.023	0.011	0.011
	Energy ⁴	0	0	0	0
	Mobile	0.16	0.23	0.26	0.067
	Total	1.2	0.25	0.27	0.079
Type 5	Area	0.62	0.014	0.0065	0.0065
	Energy ⁴	0	0	0	0
	Mobile	0.10	0.14	0.16	0.042
	Total	0.72	0.15	0.17	0.048
Type 6	Area	0.64	0.014	0.0067	0.0067
	Energy ⁴	0	0	0	0
	Mobile	0.10	0.14	0.16	0.042
	Total	0.74	0.15	0.17	0.048

Table 12
Summary of Operational Emissions
San Francisco Housing Element
San Francisco, California

Notes:

- ¹. Operational emissions were estimated with CalEEMod® 2020.4.0, with updates to silt loading, consumer products, mobile emission factors, trip rates, natural gas use, architectural coating for parking structures, and the addition of emergency generators as shown in the supporting tables.
- ². The emissions included assume the first operational year is 2025. This is likely conservative, as most buildings under the new SF Housing Element will be constructed in later years when emission factors are lower.
- ³. Parking lot ROG emissions were calculated in Table 2 and using the CalEEMod® default reapplication rate of 10% for operational emissions. This value was added to each of the total Area ROG emissions.
- ⁴. CAP emissions from building energy are zero, because natural gas is banned in new construction in San Francisco and the BAAQMD CEQA guidance does not require inclusion of indirect emissions from electricity generation.

Abbreviations:

BAAQMD - Bay Area Air Quality Management District	NOx - nitrogen oxides
CalEEMod® - California Emissions Estimator Model®	PM ₁₀ - particulate matter less than 10 microns
CAP - Criteria Air Pollutants	PM _{2.5} - particulate matter less than 2.5 microns
CEQA - California Environmental Quality Act	ROG - reactive organic gases

Reference:

California Emissions Estimator Model (CalEEMod). 2021. CAPCOA. Available online at: <http://www.caleemod.com>

California Environmental Quality Act (CEQA) Guidelines. 2017. Bay Area Air Quality Management District (BAAQMD). May. Available online at: http://www.baaqmd.gov/~media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en

Table 13.1
Maximum Health Impacts by Distance for Construction of Type 1
San Francisco Housing Element
San Francisco, California

Distance from Construction Project Boundary	Uncontrolled Maximum Health Impacts ¹		Controlled Maximum Health Impacts ²	
	Cancer Risk	PM _{2.5} Concentration (ug/m ³)	Cancer Risk	PM _{2.5} Concentration (ug/m ³)
5m/16ft	1,392	9.4	103	0.72
10m/33ft	1,215	8.2	90	0.63
20m/66ft	907	6.1	67	0.47
30m/98ft	694	4.7	52	0.36
40m/131ft	551	3.7	41	0.28
50m/164ft	448	3.0	33	0.23
60m/197ft	373	2.5	28	0.19
70m/230ft	316	2.1	23	0.16
80m/262ft	273	1.8	20	0.14
90m/295ft	238	1.6	18	0.12
100m/328ft	210	1.4	16	0.11
110m/361ft	187	1.3	14	0.10
120m/394ft	168	1.1	12	0.087
130m/427ft	152	1.0	11	0.079
140m/459ft	138	0.93	10	0.071
150m/492ft	126	0.85	9.4	0.065
160m/525ft	116	0.78	8.6	0.060
170m/558ft	107	0.72	7.9	0.055
180m/591ft	99	0.67	7.3	0.051
190m/623ft	92	0.62	6.8	0.048
200m/656ft	86	0.58	6.4	0.044
210m/689ft	80	0.54	6.0	0.041
220m/722ft	75	0.51	5.6	0.039
230m/755ft	71	0.48	5.2	0.037
240m/787ft	67	0.45	4.9	0.034
250m/820ft	63	0.43	4.7	0.033
260m/853ft	59	0.40	4.4	0.031
270m/886ft	56	0.38	4.2	0.029
280m/919ft	53	0.36	4.0	0.028
290m/951ft	51	0.34	3.8	0.026
300m/984ft	48	0.33	3.6	0.025
310m/1017ft	46	0.31	3.4	0.024
320m/1050ft	44	0.30	3.3	0.023
330m/1083ft	42	0.29	3.1	0.022
340m/1115ft	40	0.27	3.0	0.021
350m/1148ft	39	0.26	2.9	0.020

Table 13.1
Maximum Health Impacts by Distance for Construction of Type 1
San Francisco Housing Element
San Francisco, California

Distance from Construction Project Boundary	Uncontrolled Maximum Health Impacts ¹		Controlled Maximum Health Impacts ²	
	Cancer Risk	PM _{2.5} Concentration (ug/m ³)	Cancer Risk	PM _{2.5} Concentration (ug/m ³)
360m/1181ft	37	0.25	2.8	0.019
370m/1214ft	36	0.24	2.6	0.018
380m/1247ft	34	0.23	2.5	0.018
390m/1280ft	33	0.22	2.5	0.017
400m/1312ft	32	0.22	2.4	0.016
410m/1345ft	31	0.21	2.3	0.016
420m/1378ft	30	0.20	2.2	0.015
430m/1411ft	29	0.19	2.1	0.015
440m/1444ft	28	0.19	2.0	0.014
450m/1476ft	27	0.18	2.0	0.014
460m/1509ft	26	0.17	1.9	0.013
470m/1542ft	25	0.17	1.9	0.013
480m/1575ft	24	0.16	1.8	0.013
490m/1608ft	23	0.16	1.7	0.012
500m/1640ft	23	0.15	1.7	0.012

Notes:

- ¹. Lifetime excess cancer risk and PM_{2.5} concentrations are shown for the maximally exposed receptor at each distance from the construction boundary.
- ². The Controlled modeling scenario assumed Tier 4 equipment for all construction phases.

Abbreviations:

HRA - health risk assessment ft - feet
m - meter
PM_{2.5} - particulate matter less than 2.5 microns

Table 13.2
Maximum Health Impacts by Distance for Construction of Type 2
San Francisco Housing Element
San Francisco, California

Distance from Construction Project Boundary	Uncontrolled Maximum Health Impacts ¹		Controlled Maximum Health Impacts ²	
	Cancer Risk	PM _{2.5} Concentration	Cancer Risk	PM _{2.5} Concentration (ug/m ³)
5m/16ft	579	1.8 1.8	65	0.22
10m/33ft	497	1.8 1.5	56	0.19
20m/66ft	360	1.5 1.1	40	0.14
30m/98ft	269	1.10 0.82	30	0.10
40m/131ft	210	0.82 0.64	23	0.080
50m/164ft	168	0.64 0.51	19	0.064
60m/197ft	139	0.51 0.42	15	0.053
70m/230ft	117	0.42 0.36	13	0.044
80m/262ft	100	0.36 0.30	11	0.038
90m/295ft	86	0.30 0.26	10	0.033
100m/328ft	76	0.26 0.23	8.5	0.029
110m/361ft	67	0.23 0.20	7.5	0.026
120m/394ft	60	0.20 0.18	6.7	0.023
130m/427ft	54	0.18 0.16	6.0	0.021
140m/459ft	49	0.16 0.15	5.5	0.019
150m/492ft	45	0.15 0.14	5.0	0.017
160m/525ft	41	0.14 0.12	4.6	0.016
170m/558ft	38	0.12 0.11	4.2	0.014
180m/591ft	35	0.11 0.11	3.9	0.013
190m/623ft	32	0.11 0.10	3.6	0.012
200m/656ft	30	0.098 0.091	3.4	0.011
210m/689ft	28	0.091 0.085	3.1	0.011
220m/722ft	26	0.085 0.080	2.9	0.010
230m/755ft	25	0.080 0.075	2.7	0.0093
240m/787ft	23	0.075 0.071	2.6	0.0088
250m/820ft	22	0.071 0.067	2.4	0.0083
260m/853ft	21	0.067 0.063	2.3	0.0078
270m/886ft	19	0.063 0.060	2.2	0.0074
280m/919ft	18	0.060 0.056	2.1	0.0070
290m/951ft	18	0.056 0.054	2.0	0.0067
300m/984ft	17	0.054 0.051	1.9	0.0064
310m/1017ft	16	0.051 0.049	1.8	0.0061
320m/1050ft	15	0.049 0.046	1.7	0.0058
330m/1083ft	15	0.046 0.044	1.6	0.0055
340m/1115ft	14	0.044 0.042	1.6	0.0053
350m/1148ft	13	0.042 0.041	1.5	0.0051

Table 13.2
Maximum Health Impacts by Distance for Construction of Type 2
San Francisco Housing Element
San Francisco, California

Distance from Construction Project Boundary	Uncontrolled Maximum Health Impacts ¹		Controlled Maximum Health Impacts ²	
	Cancer Risk	PM _{2.5} Concentration	Cancer Risk	PM _{2.5} Concentration (ug/m ³)
360m/1181ft	13	0.041 0.039	1.4	0.0049
370m/1214ft	12	0.039 0.037	1.4	0.0047
380m/1247ft	12	0.037 0.036	1.3	0.0045
390m/1280ft	11	0.036 0.035	1.3	0.0043
400m/1312ft	11	0.035 0.033	1.2	0.0041
410m/1345ft	10	0.033 0.032	1.2	0.0040
420m/1378ft	10	0.032 0.031	1.1	0.0038
430m/1411ft	10	0.031 0.030	1.1	0.0037
440m/1444ft	9.4	0.030 0.029	1.1	0.0036
450m/1476ft	9.1	0.029 0.028	1.0	0.0035
460m/1509ft	8.8	0.028 0.027	1.0	0.0034
470m/1542ft	8.5	0.027 0.026	1.0	0.0032
480m/1575ft	8.3	0.026 0.025	0.9	0.0031
490m/1608ft	8.0	0.025 0.024	0.90	0.0030
500m/1640ft	7.8	0.024 0.024	0.87	0.0030

Notes:

- ¹. Lifetime excess cancer risk and PM_{2.5} concentrations are shown for the maximally exposed receptor at each distance from the construction boundary.
- ². The Controlled modeling scenario assumed Tier 4 equipment for all construction phases.

Abbreviations:

HRA - health risk assessment ft - feet
m - meter
PM_{2.5} - particulate matter less than 2.5 microns

Table 13.3
Maximum Health Impacts by Distance for Construction of Type 3
San Francisco Housing Element
San Francisco, California

Distance from Construction Project Boundary	Uncontrolled Maximum Health Impacts ¹		Controlled Maximum Health Impacts ²	
	Cancer Risk	PM _{2.5} Concentration (ug/m ³)	Cancer Risk	PM _{2.5} Concentration (ug/m ³)
5m/16ft	173	0.54	11	0.036
10m/33ft	148	0.46	9	0.031
20m/66ft	105	0.33	6.7	0.022
30m/98ft	77	0.24	4.9	0.016
40m/131ft	59	0.18	3.8	0.012
50m/164ft	47	0.15	3.0	0.010
60m/197ft	39	0.12	2.4	0.0081
70m/230ft	32	0.10	2.0	0.0068
80m/262ft	27	0.085	1.7	0.0058
90m/295ft	24	0.073	1.5	0.0050
100m/328ft	21	0.064	1.3	0.0043
110m/361ft	18	0.057	1.2	0.0038
120m/394ft	16	0.050	1.0	0.0034
130m/427ft	15	0.045	0.9	0.0031
140m/459ft	13	0.041	0.84	0.0028
150m/492ft	12	0.037	0.76	0.0025
160m/525ft	11	0.034	0.70	0.0023
170m/558ft	10	0.031	0.64	0.0021
180m/591ft	9.3	0.029	0.59	0.0020
190m/623ft	8.6	0.027	0.55	0.0018
200m/656ft	8.0	0.025	0.51	0.0017
210m/689ft	7.5	0.023	0.47	0.0016
220m/722ft	7.0	0.022	0.44	0.0015
230m/755ft	6.5	0.020	0.42	0.0014
240m/787ft	6.1	0.019	0.39	0.0013
250m/820ft	5.8	0.018	0.37	0.0012
260m/853ft	5.5	0.017	0.35	0.0011
270m/886ft	5.2	0.016	0.33	0.0011
280m/919ft	4.9	0.015	0.31	0.0010
290m/951ft	4.6	0.014	0.30	0.0010
300m/984ft	4.4	0.014	0.28	9.3E-04
310m/1017ft	4.2	0.013	0.27	8.8E-04
320m/1050ft	4.0	0.012	0.25	8.4E-04
330m/1083ft	3.8	0.012	0.24	8.0E-04
340m/1115ft	3.7	0.011	0.23	7.7E-04
350m/1148ft	3.5	0.011	0.22	7.4E-04

Table 13.3
Maximum Health Impacts by Distance for Construction of Type 3
San Francisco Housing Element
San Francisco, California

Distance from Construction Project Boundary	Uncontrolled Maximum Health Impacts ¹		Controlled Maximum Health Impacts ²	
	Cancer Risk	PM _{2.5} Concentration (ug/m ³)	Cancer Risk	PM _{2.5} Concentration (ug/m ³)
360m/1181ft	3.4	0.010	0.21	7.1E-04
370m/1214ft	3.2	0.010	0.20	6.8E-04
380m/1247ft	3.1	0.010	0.20	6.5E-04
390m/1280ft	3.0	0.0092	0.19	6.3E-04
400m/1312ft	2.9	0.0089	0.18	6.0E-04
410m/1345ft	2.8	0.0086	0.18	5.8E-04
420m/1378ft	2.7	0.0083	0.17	5.6E-04
430m/1411ft	2.6	0.0080	0.16	5.4E-04
440m/1444ft	2.5	0.0077	0.16	5.2E-04
450m/1476ft	2.4	0.0074	0.15	5.0E-04
460m/1509ft	2.3	0.0072	0.15	4.9E-04
470m/1542ft	2.2	0.0070	0.14	4.7E-04
480m/1575ft	2.2	0.0067	0.14	4.6E-04
490m/1608ft	2.1	0.0065	0.13	4.4E-04
500m/1640ft	2.0	0.0063	0.13	4.3E-04

Notes:

- ¹. Lifetime excess cancer risk and PM_{2.5} concentrations are shown for the maximally exposed receptor at each distance from the construction boundary.
- ². The Controlled modeling scenario assumed Tier 4 equipment for all construction phases.

Abbreviations:

HRA - health risk assessment ft - feet

m - meter

PM_{2.5} - particulate matter less than 2.5 microns

Table 13.4
Maximum Health Impacts by Distance for Construction of Type 4
San Francisco Housing Element
San Francisco, California

Distance from Construction Project Boundary	Uncontrolled Maximum Health Impacts ¹		Controlled Maximum Health Impacts ²	
	Cancer Risk	PM _{2.5} Concentration (ug/m ³)	Cancer Risk	PM _{2.5} Concentration (ug/m ³)
5m/16ft	98	0.55	5.9	0.036
10m/33ft	82	0.46	4.9	0.030
20m/66ft	56	0.32	3.4	0.021
30m/98ft	40	0.23	2.4	0.015
40m/131ft	30	0.17	1.8	0.011
50m/164ft	24	0.13	1.4	0.0088
60m/197ft	19	0.11	1.1	0.0071
70m/230ft	16	0.089	0.9	0.0059
80m/262ft	13	0.075	0.80	0.0049
90m/295ft	11	0.064	0.68	0.0042
100m/328ft	10	0.056	0.59	0.0037
110m/361ft	8.7	0.049	0.52	0.0032
120m/394ft	7.7	0.044	0.46	0.0029
130m/427ft	6.9	0.039	0.41	0.0026
140m/459ft	6.2	0.035	0.37	0.0023
150m/492ft	5.6	0.032	0.34	0.0021
160m/525ft	5.1	0.029	0.31	0.0019
170m/558ft	4.7	0.027	0.28	0.0017
180m/591ft	4.3	0.024	0.26	0.0016
190m/623ft	4.0	0.023	0.24	0.0015
200m/656ft	3.7	0.021	0.22	0.0014
210m/689ft	3.5	0.019	0.21	0.0013
220m/722ft	3.2	0.018	0.19	0.0012
230m/755ft	3.0	0.017	0.18	0.0011
240m/787ft	2.8	0.016	0.17	0.0011
250m/820ft	2.7	0.015	0.16	0.0010
260m/853ft	2.5	0.014	0.15	0.0009
270m/886ft	2.4	0.013	0.14	0.0009
280m/919ft	2.3	0.013	0.13	8.3E-04
290m/951ft	2.1	0.012	0.13	7.9E-04
300m/984ft	2.0	0.011	0.12	7.5E-04
310m/1017ft	1.9	0.011	0.12	7.2E-04
320m/1050ft	1.8	0.010	0.11	6.8E-04
330m/1083ft	1.8	0.010	0.10	6.5E-04
340m/1115ft	1.7	0.009	0.10	6.2E-04
350m/1148ft	1.6	0.0090	0.10	5.9E-04

Table 13.4
Maximum Health Impacts by Distance for Construction of Type 4
San Francisco Housing Element
San Francisco, California

Distance from Construction Project Boundary	Uncontrolled Maximum Health Impacts ¹		Controlled Maximum Health Impacts ²	
	Cancer Risk	PM _{2.5} Concentration (ug/m ³)	Cancer Risk	PM _{2.5} Concentration (ug/m ³)
360m/1181ft	1.5	0.0087	0.092	5.7E-04
370m/1214ft	1.5	0.0083	0.088	5.5E-04
380m/1247ft	1.4	0.0080	0.085	5.2E-04
390m/1280ft	1.4	0.0077	0.081	5.0E-04
400m/1312ft	1.3	0.0074	0.078	4.8E-04
410m/1345ft	1.3	0.0071	0.075	4.7E-04
420m/1378ft	1.2	0.0068	0.073	4.5E-04
430m/1411ft	1.2	0.0066	0.070	4.3E-04
440m/1444ft	1.1	0.0064	0.068	4.2E-04
450m/1476ft	1.1	0.0061	0.065	4.0E-04
460m/1509ft	1.1	0.0059	0.063	3.9E-04
470m/1542ft	1.0	0.0057	0.061	3.8E-04
480m/1575ft	1.0	0.0056	0.059	3.7E-04
490m/1608ft	1.0	0.0054	0.057	3.5E-04
500m/1640ft	0.93	0.0052	0.055	3.4E-04

Notes:

¹. Lifetime excess cancer risk and PM_{2.5} concentrations are shown for the maximally exposed receptor at each distance from the construction boundary.

². The Controlled modeling scenario assumed Tier 4 equipment for all construction phases.

Abbreviations:

HRA - health risk assessment ft - feet

m - meter

PM_{2.5} - particulate matter less than 2.5 microns

Table 13.5
Maximum Health Impacts by Distance for Construction of Type 5
San Francisco Housing Element
San Francisco, California

Distance from Construction Project Boundary	Uncontrolled Maximum Health Impacts ¹		Controlled Maximum Health Impacts ²	
	Cancer Risk	PM _{2.5} Concentration (ug/m ³)	Cancer Risk	PM _{2.5} Concentration (ug/m ³)
5m/16ft	75	0.38	6.1	0.033
10m/33ft	64	0.32	5.2	0.028
20m/66ft	46	0.23	3.7	0.020
30m/98ft	34	0.17	2.7	0.015
40m/131ft	26	0.13	2.1	0.011
50m/164ft	20	0.10	1.7	0.0090
60m/197ft	17	0.084	1.4	0.0073
70m/230ft	14	0.070	1.1	0.0061
80m/262ft	12	0.059	1.0	0.0052
90m/295ft	10	0.051	0.83	0.0045
100m/328ft	8.9	0.045	0.72	0.0039
110m/361ft	7.9	0.040	0.64	0.0035
120m/394ft	7.0	0.035	0.57	0.0031
130m/427ft	6.3	0.032	0.51	0.0028
140m/459ft	5.7	0.029	0.46	0.0025
150m/492ft	5.2	0.026	0.42	0.0023
160m/525ft	4.7	0.024	0.38	0.0021
170m/558ft	4.4	0.022	0.35	0.0019
180m/591ft	4.0	0.020	0.33	0.0018
190m/623ft	3.7	0.019	0.30	0.0016
200m/656ft	3.5	0.017	0.28	0.0015
210m/689ft	3.2	0.016	0.26	0.0014
220m/722ft	3.0	0.015	0.24	0.0013
230m/755ft	2.8	0.014	0.23	0.0012
240m/787ft	2.7	0.013	0.22	0.0012
250m/820ft	2.5	0.013	0.20	0.0011
260m/853ft	2.4	0.012	0.19	0.0010
270m/886ft	2.2	0.011	0.18	0.0010
280m/919ft	2.1	0.011	0.17	9.3E-04
290m/951ft	2.0	0.010	0.16	8.8E-04
300m/984ft	1.9	0.010	0.15	8.4E-04
310m/1017ft	1.8	0.0091	0.15	8.0E-04
320m/1050ft	1.7	0.0087	0.14	7.6E-04
330m/1083ft	1.7	0.0083	0.13	7.3E-04
340m/1115ft	1.6	0.0079	0.13	7.0E-04
350m/1148ft	1.5	0.0076	0.12	6.7E-04

Table 13.5
Maximum Health Impacts by Distance for Construction of Type 5
San Francisco Housing Element
San Francisco, California

Distance from Construction Project Boundary	Uncontrolled Maximum Health Impacts ¹		Controlled Maximum Health Impacts ²	
	Cancer Risk	PM _{2.5} Concentration (ug/m ³)	Cancer Risk	PM _{2.5} Concentration (ug/m ³)
360m/1181ft	1.5	0.0073	0.12	6.4E-04
370m/1214ft	1.4	0.0070	0.11	6.1E-04
380m/1247ft	1.3	0.0067	0.11	5.9E-04
390m/1280ft	1.3	0.0065	0.10	5.7E-04
400m/1312ft	1.2	0.0062	0.10	5.5E-04
410m/1345ft	1.2	0.0060	0.10	5.3E-04
420m/1378ft	1.2	0.0058	0.09	5.1E-04
430m/1411ft	1.1	0.0056	0.090	4.9E-04
440m/1444ft	1.1	0.0054	0.087	4.7E-04
450m/1476ft	1.0	0.0052	0.084	4.6E-04
460m/1509ft	1.0	0.0050	0.081	4.4E-04
470m/1542ft	1.0	0.0049	0.079	4.3E-04
480m/1575ft	0.94	0.0047	0.076	4.1E-04
490m/1608ft	0.91	0.0046	0.074	4.0E-04
500m/1640ft	0.88	0.0044	0.071	3.9E-04

Notes:

- ¹. Lifetime excess cancer risk and PM_{2.5} concentrations are shown for the maximally exposed receptor at each distance from the construction boundary.
- ². The Controlled modeling scenario assumed Tier 4 equipment for all construction phases.

Abbreviations:

HRA - health risk assessment ft - feet
m - meter
PM_{2.5} - particulate matter less than 2.5 microns

Table 13.6
Maximum Health Impacts by Distance for Construction of Type 6
San Francisco Housing Element
San Francisco, California

Distance from Construction Project Boundary	Uncontrolled Maximum Health Impacts ¹		Controlled Maximum Health Impacts ²	
	Cancer Risk	PM _{2.5} Concentration (ug/m ³)	Cancer Risk	PM _{2.5} Concentration (ug/m ³)
5m/16ft	136	0.72	13	0.075
10m/33ft	109	0.58	11	0.061
20m/66ft	70	0.37	6.8	0.039
30m/98ft	48	0.25	4.6	0.026
40m/131ft	35	0.18	3.3	0.019
50m/164ft	26	0.14	2.5	0.015
60m/197ft	21	0.11	2.0	0.011
70m/230ft	17	0.089	1.6	0.0093
80m/262ft	14	0.074	1.3	0.0077
90m/295ft	12	0.062	1.1	0.0065
100m/328ft	10	0.054	1.0	0.0056
110m/361ft	8.8	0.047	0.85	0.0049
120m/394ft	7.8	0.041	0.75	0.0043
130m/427ft	6.9	0.037	0.67	0.0038
140m/459ft	6.2	0.033	0.60	0.0034
150m/492ft	5.6	0.029	0.54	0.0031
160m/525ft	5.1	0.027	0.49	0.0028
170m/558ft	4.6	0.024	0.45	0.0026
180m/591ft	4.2	0.022	0.41	0.0024
190m/623ft	3.9	0.021	0.38	0.0022
200m/656ft	3.6	0.019	0.35	0.0020
210m/689ft	3.4	0.018	0.32	0.0019
220m/722ft	3.1	0.016	0.30	0.0017
230m/755ft	2.9	0.015	0.28	0.0016
240m/787ft	2.7	0.014	0.26	0.0015
250m/820ft	2.6	0.014	0.25	0.0014
260m/853ft	2.4	0.013	0.23	0.0013
270m/886ft	2.3	0.012	0.22	0.0013
280m/919ft	2.2	0.011	0.21	0.0012
290m/951ft	2.0	0.011	0.20	0.0011
300m/984ft	1.9	0.010	0.19	0.0011
310m/1017ft	1.8	0.010	0.18	0.0010
320m/1050ft	1.8	0.0092	0.17	0.0010
330m/1083ft	1.7	0.0088	0.16	9.3E-04
340m/1115ft	1.6	0.0084	0.15	8.8E-04
350m/1148ft	1.5	0.0080	0.15	8.4E-04

Table 13.6
Maximum Health Impacts by Distance for Construction of Type 6
San Francisco Housing Element
San Francisco, California

Distance from Construction Project Boundary	Uncontrolled Maximum Health Impacts ¹		Controlled Maximum Health Impacts ²	
	Cancer Risk	PM _{2.5} Concentration (ug/m ³)	Cancer Risk	PM _{2.5} Concentration (ug/m ³)
360m/1181ft	1.5	0.0077	0.14	8.1E-04
370m/1214ft	1.4	0.0074	0.13	7.7E-04
380m/1247ft	1.3	0.0071	0.13	7.4E-04
390m/1280ft	1.3	0.0068	0.12	7.1E-04
400m/1312ft	1.2	0.0065	0.12	6.9E-04
410m/1345ft	1.2	0.0063	0.11	6.6E-04
420m/1378ft	1.1	0.0060	0.11	6.3E-04
430m/1411ft	1.1	0.0058	0.11	6.1E-04
440m/1444ft	1.1	0.0056	0.10	5.9E-04
450m/1476ft	1.0	0.0054	0.10	5.7E-04
460m/1509ft	1.0	0.0052	0.10	5.5E-04
470m/1542ft	1.0	0.0051	0.093	5.3E-04
480m/1575ft	0.93	0.0049	0.090	5.1E-04
490m/1608ft	0.90	0.0047	0.087	5.0E-04
500m/1640ft	0.87	0.0046	0.084	4.8E-04

Notes:

¹. Lifetime excess cancer risk and PM_{2.5} concentrations are shown for the maximally exposed receptor at each distance from the construction boundary.

². The Controlled modeling scenario assumed Tier 4 equipment for all construction phases.

Abbreviations:

HRA - health risk assessment ft - feet

m - meter

PM_{2.5} - particulate matter less than 2.5 microns

Table 14.1
Maximum Health Impacts by Distance for
Emergency Generator Operation of Type 1
San Francisco Housing Element
San Francisco, California

Distance from Construction Project Boundary	Maximum Health Impacts ¹	
	Cancer Risk	PM _{2.5} Concentration
5m/16ft	0.063	8.4E-05
10m/33ft	0.43	5.7E-04
20m/66ft	1.3	0.0017
30m/98ft	1.6	0.0022
40m/131ft	1.6	0.0021
50m/164ft	1.5	0.0020
60m/197ft	1.3	0.0018
70m/230ft	1.2	0.0016
80m/262ft	1.1	0.0014
90m/295ft	1.0	0.0013
100m/328ft	0.86	0.0012
110m/361ft	0.78	0.0010
120m/394ft	0.71	0.0010
130m/427ft	0.65	8.8E-04
140m/459ft	0.60	8.0E-04
150m/492ft	0.55	7.4E-04
160m/525ft	0.52	6.9E-04
170m/558ft	0.48	6.4E-04
180m/591ft	0.45	6.1E-04
190m/623ft	0.43	5.7E-04
200m/656ft	0.40	5.4E-04
210m/689ft	0.38	5.1E-04
220m/722ft	0.36	4.9E-04
230m/755ft	0.34	4.6E-04
240m/787ft	0.33	4.4E-04
250m/820ft	0.32	4.3E-04
260m/853ft	0.31	4.1E-04
270m/886ft	0.29	4.0E-04
280m/919ft	0.28	3.8E-04
290m/951ft	0.27	3.7E-04
300m/984ft	0.27	3.6E-04
310m/1017ft	0.26	3.5E-04
320m/1050ft	0.25	3.4E-04
330m/1083ft	0.25	3.3E-04
340m/1115ft	0.24	3.2E-04
350m/1148ft	0.23	3.1E-04

Table 14.1
Maximum Health Impacts by Distance for
Emergency Generator Operation of Type 1
San Francisco Housing Element
San Francisco, California

Distance from Construction Project Boundary	Maximum Health Impacts ¹	
	Cancer Risk	PM _{2.5} Concentration
360m/1181ft	0.23	3.1E-04
370m/1214ft	0.22	3.0E-04
380m/1247ft	0.22	2.9E-04
390m/1280ft	0.21	2.9E-04
400m/1312ft	0.21	2.8E-04
410m/1345ft	0.20	2.7E-04
420m/1378ft	0.20	2.7E-04
430m/1411ft	0.20	2.6E-04
440m/1444ft	0.19	2.6E-04
450m/1476ft	0.19	2.5E-04
460m/1509ft	0.19	2.5E-04
470m/1542ft	0.18	2.4E-04
480m/1575ft	0.18	2.4E-04
490m/1608ft	0.18	2.4E-04
500m/1640ft	0.17	2.3E-04

Notes:

1. Lifetime excess cancer risk and PM_{2.5} concentrations are shown for the maximally exposed receptor at each distance from the project boundary.

Abbreviations:

HRA - health risk assessment ft - feet

m - meter

PM_{2.5} - particulate matter less than 2.5 microns

Table 14.2
Maximum Health Impacts by Distance for
Emergency Generator Operation of Type 2
San Francisco Housing Element
San Francisco, California

Distance from Construction Project Boundary	Maximum Health Impacts ¹	
	Cancer Risk	PM _{2.5} Concentration
5m/16ft	0.047	4.7E-04
10m/33ft	0.24	0.0024
20m/66ft	0.95	0.010
30m/98ft	1.2	0.012
40m/131ft	1.3	0.013
50m/164ft	1.2	0.012
60m/197ft	1.1	0.011
70m/230ft	1.0	0.010
80m/262ft	0.93	0.0093
90m/295ft	0.84	0.0084
100m/328ft	0.76	0.0077
110m/361ft	0.69	0.0070
120m/394ft	0.63	0.0064
130m/427ft	0.58	0.0059
140m/459ft	0.54	0.0054
150m/492ft	0.50	0.0050
160m/525ft	0.46	0.0047
170m/558ft	0.43	0.0044
180m/591ft	0.41	0.0041
190m/623ft	0.38	0.0039
200m/656ft	0.36	0.0036
210m/689ft	0.34	0.0034
220m/722ft	0.32	0.0033
230m/755ft	0.31	0.0031
240m/787ft	0.30	0.0030
250m/820ft	0.28	0.0028
260m/853ft	0.27	0.0027
270m/886ft	0.26	0.0026
280m/919ft	0.25	0.0025
290m/951ft	0.24	0.0024
300m/984ft	0.23	0.0024
310m/1017ft	0.23	0.0023
320m/1050ft	0.22	0.0022
330m/1083ft	0.21	0.0022
340m/1115ft	0.21	0.0021
350m/1148ft	0.20	0.0020

Table 14.2
Maximum Health Impacts by Distance for
Emergency Generator Operation of Type 2
San Francisco Housing Element
San Francisco, California

Distance from Construction Project Boundary	Maximum Health Impacts ¹	
	Cancer Risk	PM _{2.5} Concentration
360m/1181ft	0.20	0.0020
370m/1214ft	0.19	0.0019
380m/1247ft	0.19	0.0019
390m/1280ft	0.18	0.0019
400m/1312ft	0.18	0.0018
410m/1345ft	0.18	0.0018
420m/1378ft	0.17	0.0017
430m/1411ft	0.17	0.0017
440m/1444ft	0.17	0.0017
450m/1476ft	0.16	0.0017
460m/1509ft	0.16	0.0016
470m/1542ft	0.16	0.0016
480m/1575ft	0.16	0.0016
490m/1608ft	0.15	0.0015
500m/1640ft	0.15	0.0015

Notes:

1. Lifetime excess cancer risk and PM_{2.5} concentrations are shown for the maximally exposed receptor at each distance from the project boundary.

Abbreviations:

Abbreviations:

HRA - health risk assessment	ft - feet
------------------------------	-----------

m - meter

PM_{2.5} - particulate matter less than 2.5 microns

Table 14.3
Maximum Health Impacts by Distance for Emergency Generator Operation of Type 3
San Francisco Housing Element
San Francisco, California

Distance from Construction Project Boundary	Uncontrolled Maximum Health Impacts ¹		Controlled Maximum Health Impacts ²	
	Cancer Risk	PM _{2.5} Concentration (ug/m ³)	Cancer Risk	PM _{2.5} Concentration (ug/m ³)
5m/16ft	0.22	3.0E-04	0.029	3.9E-05
10m/33ft	1.5	0.0020	0.20	2.7E-04
20m/66ft	4.4	0.0059	0.59	7.9E-04
30m/98ft	5.6	0.0076	0.75	0.0010
40m/131ft	5.6	0.0075	0.74	0.0010
50m/164ft	5.2	0.0070	0.69	9.3E-04
60m/197ft	4.7	0.0063	0.63	8.4E-04
70m/230ft	4.2	0.0056	0.56	7.5E-04
80m/262ft	3.7	0.0050	0.50	6.7E-04
90m/295ft	3.3	0.0045	0.45	6.0E-04
100m/328ft	3.0	0.0041	0.40	5.4E-04
110m/361ft	2.7	0.0037	0.36	4.9E-04
120m/394ft	2.5	0.0033	0.33	4.5E-04
130m/427ft	2.3	0.0031	0.30	4.1E-04
140m/459ft	2.1	0.0028	0.28	3.7E-04
150m/492ft	1.9	0.0026	0.26	3.5E-04
160m/525ft	1.8	0.0024	0.24	3.2E-04
170m/558ft	1.7	0.0023	0.22	3.0E-04
180m/591ft	1.6	0.0021	0.21	2.8E-04
190m/623ft	1.5	0.0020	0.20	2.7E-04
200m/656ft	1.4	0.0019	0.19	2.5E-04
210m/689ft	1.3	0.0018	0.18	2.4E-04
220m/722ft	1.3	0.0017	0.17	2.3E-04
230m/755ft	1.2	0.0016	0.16	2.2E-04
240m/787ft	1.2	0.0016	0.15	2.1E-04
250m/820ft	1.1	0.0015	0.15	2.0E-04
260m/853ft	1.1	0.0014	0.14	1.9E-04
270m/886ft	1.0	0.0014	0.14	1.8E-04
280m/919ft	1.0	0.0013	0.13	1.8E-04
290m/951ft	1.0	0.0013	0.13	1.7E-04
300m/984ft	0.93	0.0013	0.12	1.7E-04
310m/1017ft	0.91	0.0012	0.12	1.6E-04
320m/1050ft	0.88	0.0012	0.12	1.6E-04
330m/1083ft	0.86	0.0012	0.11	1.5E-04
340m/1115ft	0.84	0.0011	0.11	1.5E-04

Table 14.3
Maximum Health Impacts by Distance for Emergency Generator Operation of Type 3
San Francisco Housing Element
San Francisco, California

Distance from Construction Project Boundary	Uncontrolled Maximum Health Impacts ¹		Controlled Maximum Health Impacts ²	
	Cancer Risk	PM _{2.5} Concentration (ug/m ³)	Cancer Risk	PM _{2.5} Concentration (ug/m ³)
350m/1148ft	0.82	0.0011	0.11	1.5E-04
360m/1181ft	0.80	0.0011	0.11	1.4E-04
370m/1214ft	0.78	0.0010	0.10	1.4E-04
380m/1247ft	0.76	0.0010	0.10	1.4E-04
390m/1280ft	0.75	0.0010	0.10	1.3E-04
400m/1312ft	0.73	0.0010	0.10	1.3E-04
410m/1345ft	0.72	0.0010	0.10	1.3E-04
420m/1378ft	0.70	9.4E-04	0.094	1.3E-04
430m/1411ft	0.69	9.3E-04	0.092	1.2E-04
440m/1444ft	0.68	9.1E-04	0.090	1.2E-04
450m/1476ft	0.66	8.9E-04	0.088	1.2E-04
460m/1509ft	0.65	8.7E-04	0.087	1.2E-04
470m/1542ft	0.64	8.6E-04	0.085	1.1E-04
480m/1575ft	0.63	8.4E-04	0.084	1.1E-04
490m/1608ft	0.62	8.3E-04	0.082	1.1E-04
500m/1640ft	0.60	8.1E-04	0.080	1.1E-04

Notes:

1. Lifetime excess cancer risk and PM_{2.5} concentrations are shown for the maximally exposed receptor at each distance from the construction boundary.
2. The Controlled modeling scenario assumed Tier 4 equipment.

Abbreviations:

HRA - health risk assessment ft - feet
m - meter
PM_{2.5} - particulate matter less than 2.5 microns

Table 15.1
Maximum Health Impacts by Distance for Construction and Emergency Generator Operation
of Type 1
San Francisco Housing Element
San Francisco, California

Distance from Construction Project Boundary	Uncontrolled Maximum Health Impacts ¹		Controlled Maximum Health Impacts ²	
	Cancer Risk	PM _{2.5} Concentration (ug/m ³)	Cancer Risk	PM _{2.5} Concentration (ug/m ³)
5m/16ft	1,392	9.4	103	0.72
10m/33ft	1,215	8.2	91	0.63
20m/66ft	908	6.1	69	0.47
30m/98ft	695	4.7	53	0.36
40m/131ft	553	3.7	42	0.29
50m/164ft	449	3.0	35	0.23
60m/197ft	374	2.5	29	0.19
70m/230ft	317	2.1	25	0.17
80m/262ft	274	1.8	21	0.14
90m/295ft	239	1.6	19	0.12
100m/328ft	211	1.4	16	0.11
110m/361ft	188	1.3	15	0.10
120m/394ft	169	1.1	13	0.088
130m/427ft	152	1.0	12	0.079
140m/459ft	139	0.94	11	0.072
150m/492ft	127	0.86	10	0.066
160m/525ft	116	0.79	9.1	0.061
170m/558ft	107	0.72	8.4	0.056
180m/591ft	99	0.67	7.8	0.052
190m/623ft	92	0.62	7.3	0.048
200m/656ft	86	0.58	6.8	0.045
210m/689ft	81	0.54	6.3	0.042
220m/722ft	76	0.51	5.9	0.039
230m/755ft	71	0.48	5.6	0.037
240m/787ft	67	0.45	5.3	0.035
250m/820ft	63	0.43	5.0	0.033
260m/853ft	60	0.40	4.7	0.031
270m/886ft	57	0.38	4.5	0.030
280m/919ft	54	0.36	4.3	0.028
290m/951ft	51	0.34	4.1	0.027
300m/984ft	49	0.33	3.9	0.025
310m/1017ft	46	0.31	3.7	0.024
320m/1050ft	44	0.30	3.5	0.023
330m/1083ft	42	0.29	3.4	0.022
340m/1115ft	41	0.27	3.2	0.021
350m/1148ft	39	0.26	3.1	0.020

Table 15.1
Maximum Health Impacts by Distance for Construction and Emergency Generator Operation
of Type 1
San Francisco Housing Element
San Francisco, California

Distance from Construction Project Boundary	Uncontrolled Maximum Health Impacts ¹		Controlled Maximum Health Impacts ²	
	Cancer Risk	PM _{2.5} Concentration (ug/m ³)	Cancer Risk	PM _{2.5} Concentration (ug/m ³)
360m/1181ft	37	0.25	3.0	0.020
370m/1214ft	36	0.24	2.9	0.019
380m/1247ft	35	0.23	2.8	0.018
390m/1280ft	33	0.22	2.7	0.017
400m/1312ft	32	0.22	2.6	0.017
410m/1345ft	31	0.21	2.5	0.016
420m/1378ft	30	0.20	2.4	0.016
430m/1411ft	29	0.19	2.3	0.015
440m/1444ft	28	0.19	2.2	0.015
450m/1476ft	27	0.18	2.2	0.014
460m/1509ft	26	0.18	2.1	0.014
470m/1542ft	25	0.17	2.0	0.013
480m/1575ft	24	0.16	2.0	0.013
490m/1608ft	24	0.16	1.9	0.012
500m/1640ft	23	0.15	1.9	0.012

Notes:

- ¹. Lifetime excess cancer risk and PM_{2.5} concentrations are shown for the maximally exposed receptor at each distance from the construction boundary.
- ². The Controlled modeling scenario assumed Tier 4 equipment for all construction phases.

Abbreviations:

HRA - health risk assessment ft - feet

m - meter

PM_{2.5} - particulate matter less than 2.5 microns

Table 15.2
Maximum Health Impacts by Distance for Construction and Emergency Generator Operation of
Type 2
San Francisco Housing Element
San Francisco, California

Distance from Construction Project Boundary	Uncontrolled Maximum Health Impacts ¹		Controlled Maximum Health Impacts ²	
	Cancer Risk	PM _{2.5} Concentration (ug/m ³)	Cancer Risk	PM _{2.5} Concentration (ug/m ³)
5m/16ft	579	1.8 1.8	65	0.22
10m/33ft	497	1.8 1.5	56	0.19
20m/66ft	361	1.5 1.1	41	0.15
30m/98ft	270	1.11 0.83	31	0.11
40m/131ft	211	0.83 0.65	25	0.093
50m/164ft	169	0.65 0.53	20	0.076
60m/197ft	140	0.52 0.43	17	0.064
70m/230ft	118	0.43 0.37	14	0.055
80m/262ft	100	0.37 0.31	12	0.047
90m/295ft	87	0.31 0.27	10	0.041
100m/328ft	77	0.27 0.24	9	0.036
110m/361ft	68	0.24 0.21	8.2	0.033
120m/394ft	61	0.21 0.19	7.4	0.029
130m/427ft	55	0.19 0.17	6.6	0.026
140m/459ft	49	0.17 0.15	6.0	0.024
150m/492ft	45	0.15 0.14	5.5	0.022
160m/525ft	41	0.14 0.13	5.0	0.020
170m/558ft	38	0.13 0.12	4.6	0.019
180m/591ft	35	0.12 0.11	4.3	0.017
190m/623ft	33	0.11 0.10	4.0	0.016
200m/656ft	30	0.10 0.10	3.7	0.015
210m/689ft	28	0.095 0.089	3.5	0.014
220m/722ft	26	0.089 0.083	3.3	0.013
230m/755ft	25	0.083 0.078	3.1	0.012
240m/787ft	23	0.078 0.074	2.9	0.012
250m/820ft	22	0.073 0.069	2.7	0.011
260m/853ft	21	0.069 0.066	2.6	0.011
270m/886ft	20	0.065 0.062	2.4	0.010
280m/919ft	19	0.062 0.059	2.3	0.010
290m/951ft	18	0.059 0.056	2.2	0.0091
300m/984ft	17	0.056 0.053	2.1	0.0087
310m/1017ft	16	0.053 0.051	2.0	0.0083
320m/1050ft	15	0.051 0.049	1.9	0.0080
330m/1083ft	15	0.049 0.046	1.8	0.0077
340m/1115ft	14	0.046 0.044	1.8	0.0074
350m/1148ft	13	0.044 0.043	1.7	0.0071
360m/1181ft	13	0.043 0.041	1.6	0.0068

Table 15.2
Maximum Health Impacts by Distance for Construction and Emergency Generator Operation of
Type 2
San Francisco Housing Element
San Francisco, California

Distance from Construction Project Boundary	Uncontrolled Maximum Health Impacts ¹		Controlled Maximum Health Impacts ²	
	Cancer Risk	PM _{2.5} Concentration (ug/m ³)	Cancer Risk	PM _{2.5} Concentration (ug/m ³)
370m/1214ft	12	0.041 0.039	1.6	0.0066
380m/1247ft	12	0.039 0.038	1.5	0.0064
390m/1280ft	11	0.038 0.036	1.4	0.0062
400m/1312ft	11	0.036 0.035	1.4	0.0060
410m/1345ft	11	0.035 0.034	1.4	0.0058
420m/1378ft	10	0.034 0.033	1.3	0.0056
430m/1411ft	10	0.033 0.032	1.3	0.0054
440m/1444ft	10	0.032 0.030	1.2	0.0053
450m/1476ft	9.3	0.030 0.029	1.2	0.0051
460m/1509ft	9.0	0.029 0.029	1.1	0.0050
470m/1542ft	8.7	0.029 0.028	1.1	0.0048
480m/1575ft	8.4	0.028 0.027	1.1	0.0047
490m/1608ft	8.2	0.027 0.026	1.0	0.0046
500m/1640ft	7.9	0.026 0.025	1.0	0.0045

Notes:

- ¹. Lifetime excess cancer risk and PM_{2.5} concentrations are shown for the maximally exposed receptor at each distance from the construction boundary.
- ². The Controlled modeling scenario assumed Tier 4 equipment for all construction phases.

Abbreviations:

HRA - health risk assessment ft - feet
m - meter
PM_{2.5} - particulate matter less than 2.5 microns

Table 15.3
Maximum Health Impacts by Distance for Construction and Emergency Generator Operation
of Type 3
San Francisco Housing Element
San Francisco, California

Distance from Construction Project Boundary	Uncontrolled Maximum Health Impacts ¹		Controlled Maximum Health Impacts ²	
	Cancer Risk	PM _{2.5} Concentration (ug/m ³)	Cancer Risk	PM _{2.5} Concentration (ug/m ³)
5m/16ft	174	0.54	11	0.036
10m/33ft	149	0.46	10	0.031
20m/66ft	110	0.33	7.3	0.023
30m/98ft	83	0.25	5.7	0.017
40m/131ft	65	0.19	4.5	0.013
50m/164ft	52	0.15	3.7	0.011
60m/197ft	43	0.13	3.1	0.0089
70m/230ft	36	0.11	2.6	0.0075
80m/262ft	31	0.090	2.2	0.0064
90m/295ft	27	0.078	1.9	0.0056
100m/328ft	24	0.068	1.7	0.0049
110m/361ft	21	0.060	1.5	0.0043
120m/394ft	19	0.054	1.4	0.0039
130m/427ft	17	0.048	1.2	0.0035
140m/459ft	15	0.044	1.1	0.0031
150m/492ft	14	0.040	1.0	0.0029
160m/525ft	13	0.036	0.9	0.0026
170m/558ft	12	0.034	0.86	0.0024
180m/591ft	11	0.031	0.80	0.0022
190m/623ft	10	0.029	0.75	0.0021
200m/656ft	9.4	0.027	0.69	0.0019
210m/689ft	8.8	0.025	0.65	0.0018
220m/722ft	8.2	0.023	0.61	0.0017
230m/755ft	7.7	0.022	0.58	0.0016
240m/787ft	7.3	0.021	0.54	0.0015
250m/820ft	6.9	0.019	0.52	0.0014
260m/853ft	6.5	0.018	0.49	0.0013
270m/886ft	6.2	0.017	0.47	0.0013
280m/919ft	5.9	0.017	0.44	0.0012
290m/951ft	5.6	0.016	0.42	0.0011
300m/984ft	5.4	0.015	0.41	0.0011
310m/1017ft	5.1	0.014	0.39	0.0010
320m/1050ft	4.9	0.014	0.37	0.0010
330m/1083ft	4.7	0.013	0.36	0.0010
340m/1115ft	4.5	0.013	0.34	9.2E-04
350m/1148ft	4.3	0.012	0.33	8.8E-04

Table 15.3
Maximum Health Impacts by Distance for Construction and Emergency Generator Operation
of Type 3
San Francisco Housing Element
San Francisco, California

Distance from Construction Project Boundary	Uncontrolled Maximum Health Impacts ¹		Controlled Maximum Health Impacts ²	
	Cancer Risk	PM _{2.5} Concentration (ug/m ³)	Cancer Risk	PM _{2.5} Concentration (ug/m ³)
360m/1181ft	4.2	0.012	0.32	8.5E-04
370m/1214ft	4.0	0.011	0.31	8.2E-04
380m/1247ft	3.9	0.011	0.30	7.9E-04
390m/1280ft	3.7	0.010	0.29	7.6E-04
400m/1312ft	3.6	0.010	0.28	7.3E-04
410m/1345ft	3.5	0.010	0.27	7.1E-04
420m/1378ft	3.4	0.0092	0.26	6.8E-04
430m/1411ft	3.3	0.0089	0.26	6.6E-04
440m/1444ft	3.2	0.0086	0.25	6.4E-04
450m/1476ft	3.1	0.0083	0.24	6.2E-04
460m/1509ft	3.0	0.0081	0.23	6.0E-04
470m/1542ft	2.9	0.0078	0.23	5.9E-04
480m/1575ft	2.8	0.0076	0.22	5.7E-04
490m/1608ft	2.7	0.0074	0.22	5.5E-04
500m/1640ft	2.6	0.0071	0.21	5.4E-04

Notes:

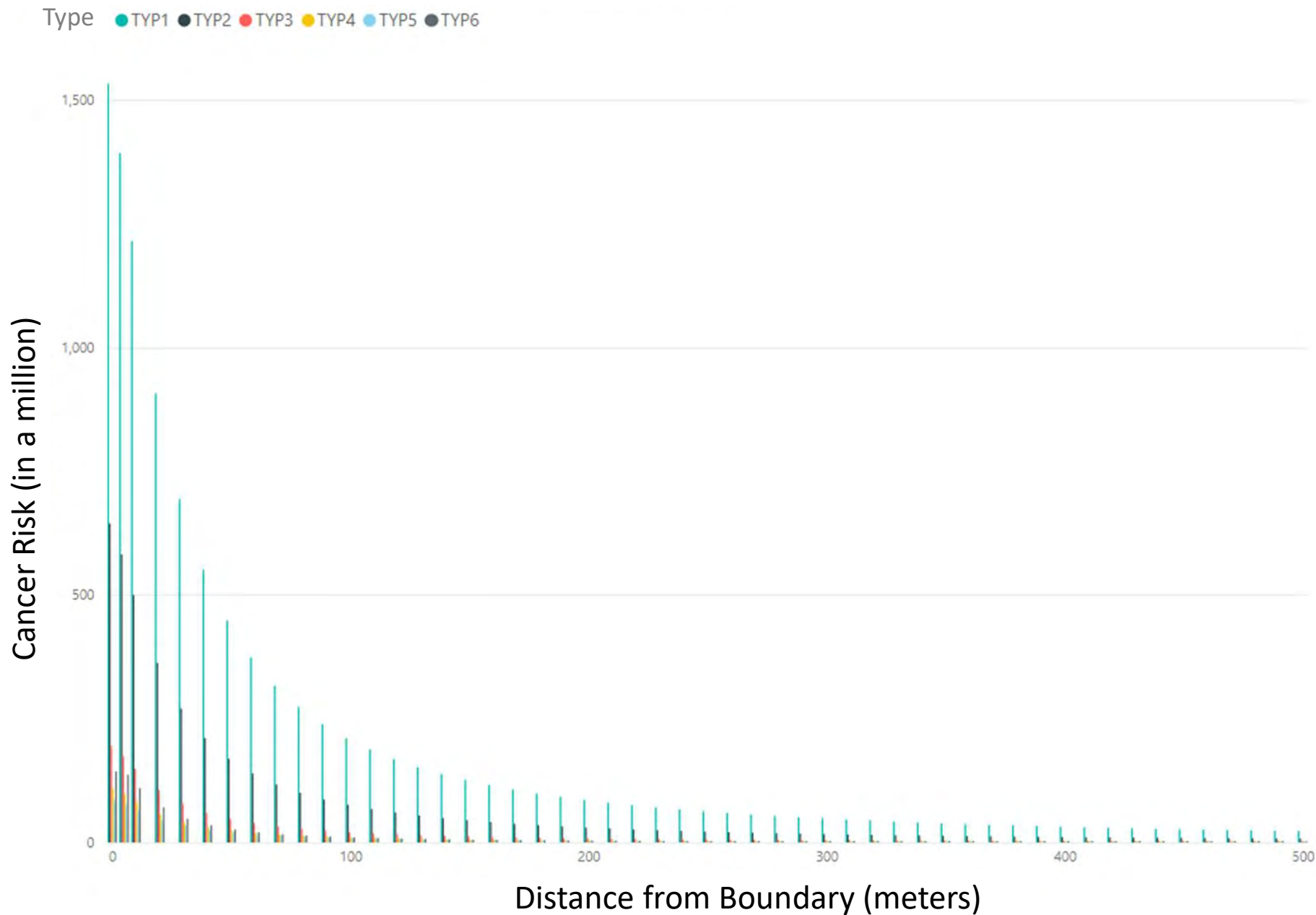
- ¹. Lifetime excess cancer risk and PM_{2.5} concentrations are shown for the maximally exposed receptor at each distance from the construction boundary.
- ². The Controlled modeling scenario assumed Tier 4 equipment for all construction phases.

Abbreviations:

HRA - health risk assessment ft - feet
m - meter
PM_{2.5} - particulate matter less than 2.5 microns

FIGURES

Cancer Risk (in a Million) by Buffer Distance (m) and Type



RAMBOLL

**Uncontrolled Construction Maximum Cancer Risk
San Francisco Housing Element 2022 Update
San Francisco, California**

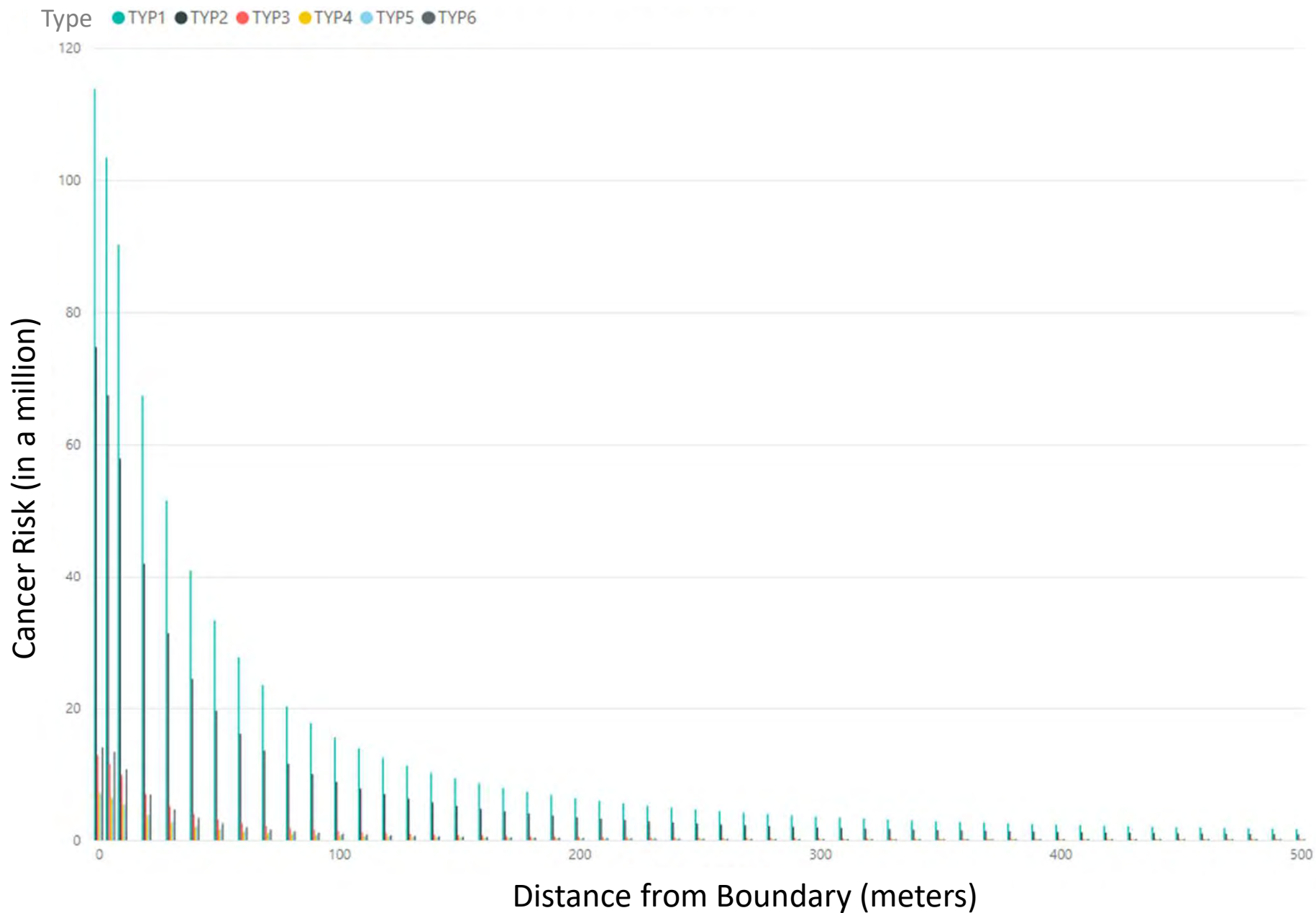
**FIGURE
1**

DRAFTED BY: RZ

DATE: 10/4/2021

PROJECT:
1690017135

Cancer Risk (in a Million) by Buffer Distance (m) and Type



Distance from Boundary (meters)



**Controlled Construction Maximum Cancer Risk
San Francisco Housing Element 2022 Update
San Francisco, California**

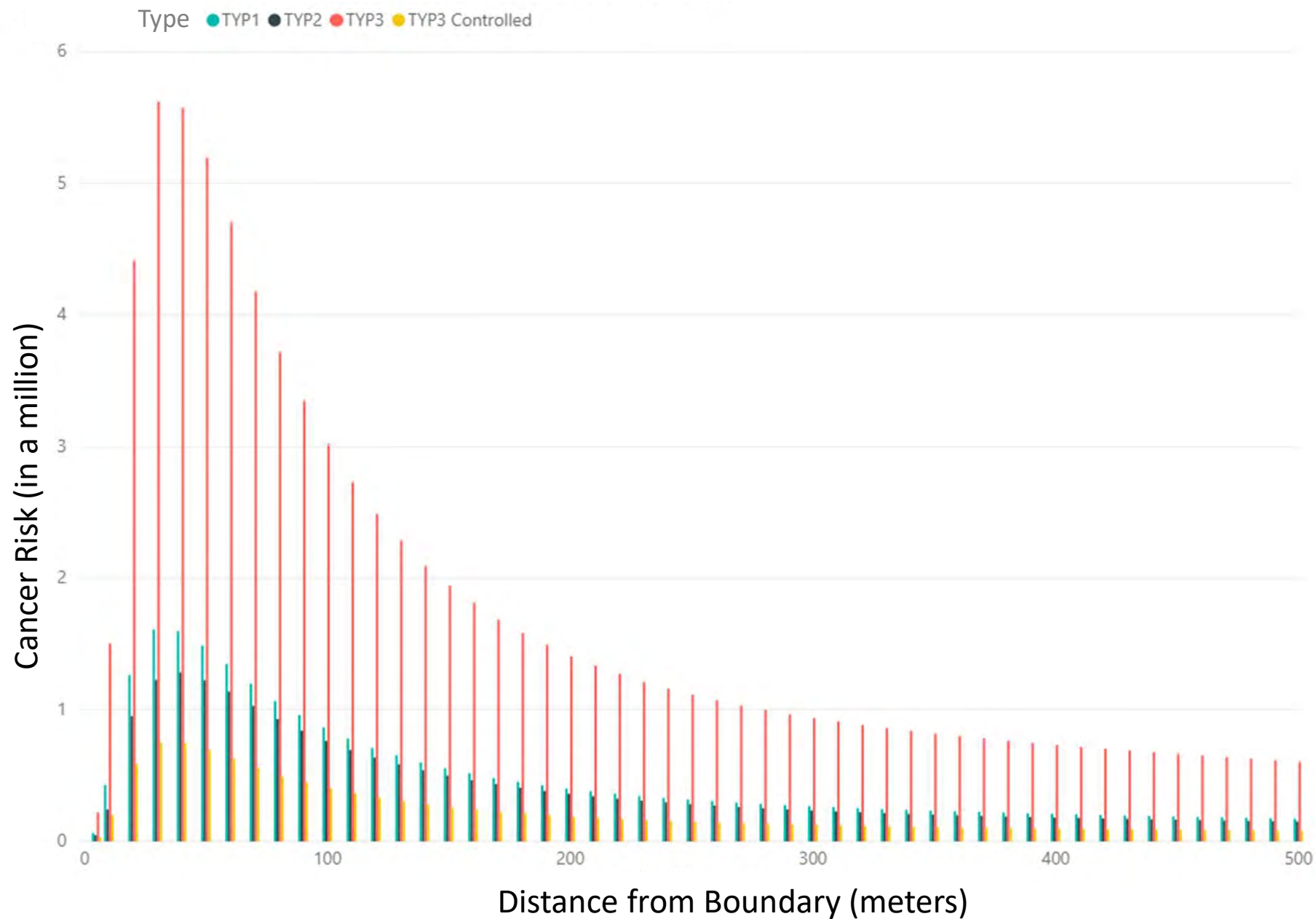
**FIGURE
2**

DRAFTED BY: RZ

DATE: 10/4/2021

PROJECT:
1690017135

Cancer Risk (in a Million) by Buffer Distance (m) and Type



Emergency Generator Maximum Cancer Risk
San Francisco Housing Element 2022 Update
San Francisco, California

FIGURE
3

DRAFTED BY: RZ

DATE: 10/4/2021

PROJECT:
1690017135

RAMBOLL

APPENDIX A

TRIP RATES

SAN FRANCISCO TRAVEL DEMAND TOOL INFO

Building Type 1

WEBSITE VERSION: 0.3.2

DATA VERSION: 0.3

PROJECT LOCATION ATTRIBUTES

Address: 10 South Van Ness

District: SoMa

Place Type: Urban high density

City: San Francisco

SELECTED FILTERS

Time Period: daily

Purpose: work and non-work

Direction: inbound and outbound

Distribution: district

Average vehicle occupancy

Landuse	District AVO	Place Type	City AVO
Residential	1.2	1.5	1.5
Hotel	1.5	1.6	1.6
Retail	1.5	1.6	1.6
Supermark	1.5	1.6	1.6
Office	1.2	1.2	1.2
Restaurant	1.5	1.6	1.6
Composite	1.5	1.6	1.6

Total Trips Generated by Land Use and Time

Landuse	Amount	Unit	Daily Person	Daily Person	PM Person	PM Person
Residential	1173	Bedrooms	4.5	5278.5	0.4	469.2
Hotel	null	Rooms	8.4	0	0.6	0
Retail	29.5	1K Square F	150	4425	13.5	398.3
Supermark	0	1K Square F	297	0	21.7	0
Office	0	1K Square F	15.7	0	1.4	0
Restaurant	0	1K Square F	200	0	27	0
Composite	0	1K Square F	600	0	81	0
Total				9703.5		867.5

Mode Split Distribution

Landuse	Auto	TNC/Taxi	Transit	Private Shu	Walk	Bike
Residential	0.248	0.06	0.28	0.005	0.377	0.029
Hotel	0.175	0.196	0.059	0.018	0.551	0
Retail	0.113	0.046	0.254	0	0.549	0.037
Supermark	0.113	0.046	0.254	0	0.549	0.037
Office	0.184	0.061	0.288	0.006	0.423	0.037
Restaurant	0.113	0.046	0.254	0	0.549	0.037
Composite	0.113	0.046	0.254	0	0.549	0.037

Total Trips by Mode

Mode	Total Person	Filtered Person	Total Vehicle	Filtered Vehicle
Auto	1809.1	1809.1	1399	1399
TNC/Taxi	520.3	520.3	346.8	346.8
Transit	2601.9	2601.9		
Private Shu	26.4	26.4		
Walk	4419.3	4419.3		
Bike	316.8	316.8		

auto Person Trips Distribution by District

Landuse	Downtown	SoMa	Marina/Wharf	Mission/	Bayshore	Richmond	Sunset	Islands	South Bay	East Bay	North Bay	OuterMission/Hills
Residential	168.1	273.7	165.3	61.6	309.3	33.8	0	0	67.2	196.3	0	33.8
Hotel	0	0	0	0	0	0	0	0	0	0	0	0
Retail	37.5	42.6	57.7	34.7	35.1	51.9	35.7	0	113.2	67.5	12.6	11.6
Supermark	0	0	0	0	0	0	0	0	0	0	0	0
Office	0	0	0	0	0	0	0	0	0	0	0	0
Restaurant	0	0	0	0	0	0	0	0	0	0	0	0
Composite	0	0	0	0	0	0	0	0	0	0	0	0
Total	205.6	316.3	223.1	96.3	344.5	85.6	35.7	0	180.3	263.8	12.6	45.4

auto Vehicle Trips Distribution by District

Landuse	Downtown	SoMa	Marina/Wharf	Mission/	Bayshore	Richmond	Sunset	Islands	South Bay	East Bay	North Bay	OuterMission/Hills
Residential	135.9	221.2	133.6	49.8	250	27.3	0	0	54.3	158.6	0	27.3
Hotel	0	0	0	0	0	0	0	0	0	0	0	0
Retail	25.6	29	39.4	23.7	24	35.4	24.3	0	77.2	46	8.6	7.9
Supermark	0	0	0	0	0	0	0	0	0	0	0	0
Office	0	0	0	0	0	0	0	0	0	0	0	0
Restaurant	0	0	0	0	0	0	0	0	0	0	0	0
Composite	0	0	0	0	0	0	0	0	0	0	0	0
Total	161.4	250.3	173	73.5	274	62.7	24.3	0	131.5	204.7	8.6	35.2

WEBSITE VERSION: 0.3.2
DATA VERSION: 0.3

PROJECT LOCATION ATTRIBUTES

Address: 469 Stevenson
District: Downtown/NorthBeach
Place Type Urban high density
City: San Francisco

SELECTED FILTERS

Time Period: daily
Purpose: work and non-work
Direction: inbound and outbound
Distribution: district

Average vehicle occupancy

Landuse	District AVI	Place Type	City AVO
Residential	1.5	1.5	1.5
Hotel	1.6	1.6	1.6
Retail	1.6	1.6	1.6
Supermark	1.6	1.6	1.6
Office	1.2	1.2	1.2
Restaurant	1.6	1.6	1.6
Composite	1.6	1.6	1.6

Total Trips Generated by Land Use and Time

Landuse	Amount	Unit	Daily Person Trip Rate	Daily Person Trips	PM Person Trip Rate	PM Person Trips
Residential	707	Bedrooms	4.5	3181.5	0.4	282.8
Hotel	null	Rooms	8.4	0	0.6	0
Retail	4	1K Square ft	150	600	13.5	54
Supermark	0	1K Square ft	297	0	21.7	0
Office	0	1K Square ft	15.7	0	1.4	0
Restaurant	0	1K Square ft	200	0	27	0
Composite	0	1K Square ft	600	0	81	0
Total				3781.5		336.8

Mode Split Distribution

Landuse	Auto	TNC/Taxi	Transit	Private Shuttle	Walk	Bike	
Residential	0.248	0.06		0.28	0.005	0.377	0.029
Hotel	0.175	0.196		0.059	0.018	0.551	0
Retail	0.113	0.046		0.254	0	0.549	0.037
Supermark	0.113	0.046		0.254	0	0.549	0.037
Office	0.184	0.061		0.288	0.006	0.423	0.037
Restaurant	0.113	0.046		0.254	0	0.549	0.037
Composite	0.113	0.046		0.254	0	0.549	0.037

Total Trips by Mode

Mode	Total Person Trips	Filtered Person Trips	Total Vehicle Trips	Filtered Vehicle Trips
Auto	856.8	856.8	568.2	568.2
TNC/Taxi	218.5	218.5	145.7	145.7
Transit	1043.2	1043.2		
Private Shuttle	15.9	15.9		
Walk	1528.8	1528.8		
Bike	114.5	114.5		

auto Person Trips Distribution by District

Landuse	Downtown	SoMa	Marina/Western	Market	Mission/	Bayshore	Richmond	Sunset	Islands	South Bay	East Bay	North Bay	Outer	Mission/Hills
Residential	223.1	48.8		199.5		41	17.2	8.9	24.8	0	83.7	43	5.7	93.1
Hotel	0	0		0		0	0	0	0	0	0	0	0	0
Retail	15.6	3.6		9.3		4.9	1.1	2.3	1.8	0	9.9	9.6	2.3	7.5
Supermark	0	0		0		0	0	0	0	0	0	0	0	0
Office	0	0		0		0	0	0	0	0	0	0	0	0
Restaurant	0	0		0		0	0	0	0	0	0	0	0	0
Composite	0	0		0		0	0	0	0	0	0	0	0	0
Total	238.7	52.4		208.8		45.9	18.4	11.3	26.6	0	93.6	52.6	7.9	100.6

auto Vehicle Trips Distribution by District

Landuse	Downtown SoMa		Marina/WesternMarket	Mission/	Bayshore	Richmond	Sunset	Islands	South Bay	East Bay	North Bay	OuterMission/Hills	
Residential	148.8	32.6		133.1	27.4	11.5	6	16.5	0	55.8	28.7	3.8	62.1
Hotel	0	0		0	0	0	0	0	0	0	0	0	0
Retail	9.6	2.2		5.7	3	0.7	1.4	1.1	0	6.1	5.9	1.4	4.6
Supermark	0	0		0	0	0	0	0	0	0	0	0	0
Office	0	0		0	0	0	0	0	0	0	0	0	0
Restaurant	0	0		0	0	0	0	0	0	0	0	0	0
Composite	0	0		0	0	0	0	0	0	0	0	0	0
Total	158.4	34.8		138.8	30.4	12.2	7.4	17.7	0	61.9	34.6	5.2	66.7

SAN FRANCISCO TRAVEL DEMAND TOOL INFO

Building Type 3

WEBSITE VERSION: 0.3.2

DATA VERSION: 0.3

PROJECT LOCATION ATTRIBUTES

Address: 900 7th Street
 District: Mission/
 Place Type: Urban medium density
 City: San Francisco

SELECTED FILTERS

Time Period: daily
 Purpose: work and non-work
 Direction: inbound and outbound
 Distribution: district

Average vehicle occupancy

Landuse	District AVO	Place Type	City AVO
Residential	1.5	1.4	1.5
Hotel	1.5	1.6	1.6
Retail	1.5	1.6	1.6
Supermarket	1.5	1.6	1.6
Office	1.1	1.1	1.2
Restaurant	1.5	1.6	1.6
Composite	1.5	1.6	1.6

Total Trips Generated by Land Use and Time

Landuse	Amount	Unit	Daily Person	Daily Person PM	Person	Person Trips
Residential	565	Bedrooms	4.5	2542.5	0.4	226
Hotel	null	Rooms	8.4	0	0.6	0
Retail	3	1K Square ft	150	450	13.5	40.5
Supermarket	0	1K Square ft	297	0	21.7	0
Office	0	1K Square ft	15.7	0	1.4	0
Restaurant	0	1K Square ft	200	0	27	0
Composite	0	1K Square ft	600	0	81	0
Total				2992.5		266.5

Mode Split Distribution

Landuse	Auto	TNC/Taxi	Transit	Private Shuttle	Walk	Bike
Residential	0.389	0.035	0.19	0.003	0.343	0.039
Hotel	0.269	0.157	0.147	0.042	0.384	0
Retail	0.259	0.014	0.118	0.005	0.576	0.028
Supermarket	0.259	0.014	0.118	0.005	0.576	0.028
Office	0.374	0.111	0.186	0.129	0.171	0.028
Restaurant	0.259	0.014	0.118	0.005	0.576	0.028
Composite	0.259	0.014	0.118	0.005	0.576	0.028

Total Trips by Mode

Mode	Total Person Trips	Filtered Person	Total Vehicle	Filtered Vehicle Trips
Auto	1105.6	1105.6	749.9	749.9
TNC/Taxi	95.3	95.3	63.5	63.5
Transit	536.2	536.2		
Private Shuttle	9.9	9.9		
Walk	1131.3	1131.3		
Bike	111.8	111.8		

auto Person Trips Distribution by District

Landuse	Downtown/NorthBeach	SoMa	Marina/W	Mission/	Bayshore	Richmond	Sunset	Islands	South Bay	East Bay	North Bay	OuterMission/Hills
Residential	65.9	41.4	174.8	345.8	10.5	3.8	23.1	0	53.4	131.5	0	138.9
Hotel	0	0	0	0	0	0	0	0	0	0	0	0
Retail	7.5	3.4	10.4	35.1	8.4	0.9	0.9	0	14	9.3	3.6	23.1
Supermark	0	0	0	0	0	0	0	0	0	0	0	0
Office	0	0	0	0	0	0	0	0	0	0	0	0
Restaurant	0	0	0	0	0	0	0	0	0	0	0	0
Composite	0	0	0	0	0	0	0	0	0	0	0	0
Total	73.4	44.8	185.2	380.9	18.9	4.7	24	0	67.4	140.8	3.6	162

auto Vehicle Trips Distribution by District

Landuse	Downtown/NorthBeach	SoMa	Marina/W	Mission/	Bayshore	Richmond	Sunset	Islands	South Bay	East Bay	North Bay	OuterMission/Hills
Residential	44.9	28.2	119	235.5	7.2	2.6	15.7	0	36.4	89.5	0	94.6
Hotel	0	0	0	0	0	0	0	0	0	0	0	0
Retail	4.9	2.2	6.8	23	5.5	0.6	0.6	0	9.2	6.1	2.3	15.2
Supermark	0	0	0	0	0	0	0	0	0	0	0	0
Office	0	0	0	0	0	0	0	0	0	0	0	0
Restaurant	0	0	0	0	0	0	0	0	0	0	0	0
Composite	0	0	0	0	0	0	0	0	0	0	0	0
Total	49.8	30.5	125.8	258.5	12.6	3.2	16.3	0	45.5	95.6	2.3	109.7

SAN FRANCISCO TRAVEL DEMAND TOOL INFO

Building Type 4

WEBSITE VERSION: 0.3.2

DATA VERSION: 0.3

PROJECT LOCATION ATTRIBUTES

Address: 1400 19th Avenue

District: Sunset

Place Type: Urban low density

City: San Francisco

SELECTED FILTERS

Time Period: daily

Purpose: work and non-work

Direction: inbound and outbound

Distribution: district

Average vehicle occupancy

Landuse	District AVO	Place Type	City AVO
Residential	1.6		1.5
Hotel	1.8		1.6
Retail	1.8		1.6
Supermark	1.8		1.6
Office	1.2		1.2
Restaurant	1.8		1.6
Composite	1.8		1.6

Total Trips Generated by Land Use and Time

Landuse	Amount	Unit	Daily Person	Daily Person	PM Person	PM Person
Residential	71	Bedrooms	4.5	319.5	0.4	28.4
Hotel	null	Rooms	8.4	0	0.6	0
Retail	2	1K Square F	150	300	13.5	27
Supermark	0	1K Square F	297	0	21.7	0
Office	0	1K Square F	15.7	0	1.4	0
Restaurant	0	1K Square F	200	0	27	0
Composite	0	1K Square F	600	0	81	0
Total				619.5		55.4

Mode Split Distribution

Landuse	Auto	TNC/Taxi	Transit	Private Shu	Walk	Bike
Residential	0.389	0.035	0.19	0.003	0.343	0.039
Hotel	0.455	0.075	0.015	0	0.456	0
Retail	0.54	0.01	0.158	0.003	0.278	0.011
Supermark	0.54	0.01	0.158	0.003	0.278	0.011
Office	0.694	0.02	0.036	0.186	0.057	0.006
Restaurant	0.54	0.01	0.158	0.003	0.278	0.011
Composite	0.54	0.01	0.158	0.003	0.278	0.011

Total Trips by Mode

Mode	Total Person	Filtered Person	Total Vehicle	Filtered Vehicle
Auto	286.3	286.3	166	166
TNC/Taxi	14.2	14.2	9.5	9.5
Transit	108.1	108.1		
Private Shu	1.9	1.9		
Walk	193	193		
Bike	15.8	15.8		

auto Person Trips Distribution by District

Landuse	Downtown	SoMa	Marina/W	€ Mission/	Bayshore	Richmond	Sunset	Islands	South Bay	East Bay	North Bay	OuterMission/Hills
Residential	3	1.9	11.7	1.6	4.4	14.8	55	0	17.5	1.9	5.1	7.4
Hotel	0	0	0	0	0	0	0	0	0	0	0	0
Retail	1.5	1.9	8.4	1.6	1.1	7.8	73.8	0	28.1	3.6	2.2	32.1
Supermark	0	0	0	0	0	0	0	0	0	0	0	0
Office	0	0	0	0	0	0	0	0	0	0	0	0
Restaurant	0	0	0	0	0	0	0	0	0	0	0	0
Composite	0	0	0	0	0	0	0	0	0	0	0	0
Total	4.5	3.8	20.1	3.2	5.5	22.6	128.8	0	45.6	5.4	7.3	39.5

auto Vehicle Trips Distribution by District

Landuse	Downtown	SoMa	Marina/W	€ Mission/	Bayshore	Richmond	Sunset	Islands	South Bay	East Bay	North Bay	OuterMission/Hills
Residential	1.9	1.2	7.4	1	2.8	9.3	34.6	0	11	1.2	3.2	4.6
Hotel	0	0	0	0	0	0	0	0	0	0	0	0
Retail	0.8	1	4.5	0.9	0.6	4.2	40	0	15.2	1.9	1.2	17.4
Supermark	0	0	0	0	0	0	0	0	0	0	0	0
Office	0	0	0	0	0	0	0	0	0	0	0	0
Restaurant	0	0	0	0	0	0	0	0	0	0	0	0
Composite	0	0	0	0	0	0	0	0	0	0	0	0
Total	2.7	2.2	11.9	1.9	3.3	13.5	74.6	0	26.2	3.1	4.4	22

SAN FRANCISCO TRAVEL DEMAND TOOL INFO

Building Type 5

WEBSITE VERSION: 0.3.2

DATA VERSION: 0.3

PROJECT LOCATION ATTRIBUTES

Address: 3700 California
 District: Marina/WesternMarket
 Place Type Urban medium density
 City: San Francisco

SELECTED FILTERS

Time Period: daily
 Purpose: work and non-work
 Direction: inbound and outbound
 Distribution: district

Average vehicle occupancy

Landuse	District AVO	Place Type	City AVO
Residential	1.2	1.4	1.5
Hotel	1.6	1.6	1.6
Retail	1.6	1.6	1.6
Supermarket	1.6	1.6	1.6
Office	1.2	1.1	1.2
Restaurant	1.6	1.6	1.6
Composite	1.6	1.6	1.6

Total Trips Generated by Land Use and Time

Landuse	Amount	Unit	Daily Person	Daily Person	PM Person	PM Person	Trips
Residential	41	Bedrooms	4.5	184.5	0.4	16.4	
Hotel	null	Rooms	8.4	0	0.6	0	
Retail	0	1K Square ft	150	0	13.5	0	
Supermarket	0	1K Square ft	297	0	21.7	0	
Office	0	1K Square ft	15.7	0	1.4	0	
Restaurant	0	1K Square ft	200	0	27	0	
Composite	0	1K Square ft	600	0	81	0	
Total				184.5		16.4	

Mode Split Distribution

Landuse	Auto	TNC/Taxi	Transit	Private Share	Walk	Bike
Residential	0.389	0.035	0.19	0.003	0.343	0.039
Hotel	0.269	0.157	0.147	0.042	0.384	0
Retail	0.259	0.014	0.118	0.005	0.576	0.028
Supermarket	0.259	0.014	0.118	0.005	0.576	0.028
Office	0.374	0.111	0.186	0.129	0.171	0.028
Restaurant	0.259	0.014	0.118	0.005	0.576	0.028
Composite	0.259	0.014	0.118	0.005	0.576	0.028

Total Trips by Mode

Mode	Total Person	Filtered Person	Total Vehicle	Filtered Vehicle	Trips
Auto	71.8	71.8	59.8	59.8	
TNC/Taxi	6.5	6.5	4.3	4.3	
Transit	35.1	35.1			
Private Share	0.6	0.6			
Walk	63.3	63.3			
Bike	7.2	7.2			

auto Person Trips Distribution by District

Landuse	Downtown	SoMa	Marina/Wharf	Mission/	Bayshore	Richmond	Sunset	Islands	South Bay	East Bay	North Bay	OuterMission/Hills
Residential	8.4	2.4	26.8	2.1	0.2	9.5	3.7	0	8.4	2.9	3	4.4
Hotel	0	0	0	0	0	0	0	0	0	0	0	0
Retail	0	0	0	0	0	0	0	0	0	0	0	0
Supermark	0	0	0	0	0	0	0	0	0	0	0	0
Office	0	0	0	0	0	0	0	0	0	0	0	0
Restaurant	0	0	0	0	0	0	0	0	0	0	0	0
Composite	0	0	0	0	0	0	0	0	0	0	0	0
Total	8.4	2.4	26.8	2.1	0.2	9.5	3.7	0	8.4	2.9	3	4.4

auto Vehicle Trips Distribution by District

Landuse	Downtown	SoMa	Marina/Wharf	Mission/	Bayshore	Richmond	Sunset	Islands	South Bay	East Bay	North Bay	OuterMission/Hills
Residential	7	2	22.3	1.7	0.2	7.9	3.1	0	7	2.4	2.5	3.7
Hotel	0	0	0	0	0	0	0	0	0	0	0	0
Retail	0	0	0	0	0	0	0	0	0	0	0	0
Supermark	0	0	0	0	0	0	0	0	0	0	0	0
Office	0	0	0	0	0	0	0	0	0	0	0	0
Restaurant	0	0	0	0	0	0	0	0	0	0	0	0
Composite	0	0	0	0	0	0	0	0	0	0	0	0
Total	7	2	22.3	1.7	0.2	7.9	3.1	0	7	2.4	2.5	3.7

SAN FRANCISCO TRAVEL DEMAND TOOL INFO

Building Type 6

WEBSITE VERSION: 0.3.2

DATA VERSION: 0.3

PROJECT LOCATION ATTRIBUTES

Address: 3333 California
 District: Marina/WesternMarket
 Place Type: Urban medium density
 City: San Francisco

SELECTED FILTERS

Time Period: daily
 Purpose: work and non-work
 Direction: inbound and outbound
 Distribution: district

Average vehicle occupancy

Landuse	District AVO	Place Type	City AVO
Residential	1.2	1.4	1.5
Hotel	1.6	1.6	1.6
Retail	1.6	1.6	1.6
Supermark	1.6	1.6	1.6
Office	1.2	1.1	1.2
Restaurant	1.6	1.6	1.6
Composite	1.6	1.6	1.6

Total Trips Generated by Land Use and Time

Landuse	Amount	Unit	Daily Person	Daily Person	PM Person	PM Person
Residential	41	Bedrooms	4.5	184.5	0.4	16.4
Hotel	null	Rooms	8.4	0	0.6	0
Retail	0	1K Square Foot	150	0	13.5	0
Supermark	0	1K Square Foot	297	0	21.7	0
Office	0	1K Square Foot	15.7	0	1.4	0
Restaurant	0	1K Square Foot	200	0	27	0
Composite	0	1K Square Foot	600	0	81	0
Total				184.5		16.4

Mode Split Distribution

Landuse	Auto	TNC/Taxi	Transit	Private Shuttle	Walk	Bike
Residential	0.389	0.035	0.19	0.003	0.343	0.039
Hotel	0.269	0.157	0.147	0.042	0.384	0
Retail	0.259	0.014	0.118	0.005	0.576	0.028
Supermark	0.259	0.014	0.118	0.005	0.576	0.028
Office	0.374	0.111	0.186	0.129	0.171	0.028
Restaurant	0.259	0.014	0.118	0.005	0.576	0.028
Composite	0.259	0.014	0.118	0.005	0.576	0.028

Total Trips by Mode

Mode	Total Person	Filtered Person	Total Vehicle	Filtered Vehicle
Auto	71.8	71.8	59.8	59.8
TNC/Taxi	6.5	6.5	4.3	4.3
Transit	35.1	35.1		
Private Shuttle	0.6	0.6		
Walk	63.3	63.3		
Bike	7.2	7.2		

auto Person Trips Distribution by District

Landuse	Downtown	SoMa	Marina/W	Mission/	Bayshore	Richmond	Sunset	Islands	South Bay	East Bay	North Bay	OuterMission/Hills
Residential	8.4	2.4	26.8	2.1	0.2	9.5	3.7	0	8.4	2.9	3	4.4
Hotel	0	0	0	0	0	0	0	0	0	0	0	0
Retail	0	0	0	0	0	0	0	0	0	0	0	0
Supermark	0	0	0	0	0	0	0	0	0	0	0	0
Office	0	0	0	0	0	0	0	0	0	0	0	0
Restaurant	0	0	0	0	0	0	0	0	0	0	0	0
Composite	0	0	0	0	0	0	0	0	0	0	0	0
Total	8.4	2.4	26.8	2.1	0.2	9.5	3.7	0	8.4	2.9	3	4.4

auto Vehicle Trips Distribution by District

Landuse	Downtown	SoMa	Marina/W	Mission/	Bayshore	Richmond	Sunset	Islands	South Bay	East Bay	North Bay	OuterMission/Hills
Residential	7	2	22.3	1.7	0.2	7.9	3.1	0	7	2.4	2.5	3.7
Hotel	0	0	0	0	0	0	0	0	0	0	0	0
Retail	0	0	0	0	0	0	0	0	0	0	0	0
Supermark	0	0	0	0	0	0	0	0	0	0	0	0
Office	0	0	0	0	0	0	0	0	0	0	0	0
Restaurant	0	0	0	0	0	0	0	0	0	0	0	0
Composite	0	0	0	0	0	0	0	0	0	0	0	0
Total	7	2	22.3	1.7	0.2	7.9	3.1	0	7	2.4	2.5	3.7

APPENDIX B
B-1 OPERATIONAL CALEEMOD OUTPUTS

SF Housing Element - Typology 1 - San Francisco County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**SF Housing Element - Typology 1
San Francisco County, Annual****1.0 Project Characteristics****1.1 Land Usage**

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Apartments High Rise	984.00	Dwelling Unit	15.87	935,745.00	2814
Strip Mall	30.35	1000sqft	0.70	30,350.00	0

1.2 Other Project Characteristics

Urbanization	Urban	Wind Speed (m/s)	4.6	Precipitation Freq (Days)	64
Climate Zone	5			Operational Year	2025
Utility Company	Pacific Gas and Electric Company				
CO2 Intensity (lb/MWhr)	203.98	CH4 Intensity (lb/MWhr)	0.033	N2O Intensity (lb/MWhr)	0.004

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use - Typology Land Uses Only, Residential area based on DEIR

Construction Phase - Operational emissions only

Grading -

Vehicle Trips - Weekday trip rates provided by SFEP from the SFCTA Travel Demand Tool for each typology and district including auto and TNC/taxi modes. Trip lengths and types are from CalEEMod defaults. Weekend trip rates are scaled by CalEEMod default ratios between weekend/weekday.

Vehicle Emission Factors - EMFAC2021 outputs converted to CalEEMod EFs

Vehicle Emission Factors - EMFAC2021 outputs converted to CalEEMod EFs

Vehicle Emission Factors - EMFAC2021 outputs converted to CalEEMod EFs

Road Dust - Updated silt loading factor for SF county from CARB 2018 Miscellaneous Process Methodology 7.9 for Entrained Road Travel, Paved Road Dust.

Woodstoves - Natural gas fireplaces or woodstoves are not allowed in new San Francisco buildings.

SF Housing Element - Typology 1 - San Francisco County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Consumer Products - CalEEMod default missions factor assumes 2008 statewide VOC inventory and building square footage. An updated 2017 VOC inventory from CARB and population estimates based on the CA DOF demographic projections were used to estimate a statewide VOC EF for 2017.

Energy Use - San Francisco has banned the installation of new natural gas infrastructure in residential buildings.

Fleet Mix - EMFAC2021 outputs converted to CalEEMod fleet mix

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	20.00	0.00
tblConstructionPhase	NumDays	300.00	0.00
tblConstructionPhase	NumDays	20.00	0.00
tblConstructionPhase	NumDays	30.00	0.00
tblConstructionPhase	NumDays	20.00	0.00
tblConstructionPhase	NumDays	10.00	0.00
tblConsumerProducts	ROG_EF	2.14E-05	1.62E-05
tblEnergyUse	NT24NG	2,615.00	0.00
tblEnergyUse	NT24NG	0.70	0.00
tblEnergyUse	T24NG	5,828.01	0.00
tblEnergyUse	T24NG	3.86	0.00
tblFireplaces	FireplaceDayYear	11.14	0.00
tblFireplaces	FireplaceHourDay	3.50	0.00
tblFireplaces	FireplaceWoodMass	228.80	0.00
tblFireplaces	NumberGas	147.60	0.00
tblFireplaces	NumberNoFireplace	39.36	0.00
tblFireplaces	NumberWood	167.28	0.00
tblFleetMix	HHD	4.2330e-003	0.01
tblFleetMix	HHD	4.2330e-003	0.01
tblFleetMix	LDA	0.56	0.53
tblFleetMix	LDA	0.56	0.53
tblFleetMix	LDT1	0.06	0.04
tblFleetMix	LDT1	0.06	0.04
tblFleetMix	LDT2	0.19	0.23

SF Housing Element - Typology 1 - San Francisco County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)
		Highest		

2.2 Overall Operational**Unmitigated Operational**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	3.7500	0.0841	7.2997	3.9000e-004		0.0405	0.0405		0.0405	0.0405						
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000						
Mobile	0.4923	0.6567	4.6755	0.0127	0.7137	9.5600e-003	0.7233	0.1807	8.9200e-003	0.1896						
Waste						0.0000	0.0000		0.0000	0.0000						
Water						0.0000	0.0000		0.0000	0.0000						
Total	4.2423	0.7408	11.9752	0.0131	0.7137	0.0501	0.7638	0.1807	0.0494	0.2301						

SF Housing Element - Typology 1 - San Francisco County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

2.2 Overall Operational

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	3.7500	0.0841	7.2997	3.9000e-004		0.0405	0.0405		0.0405	0.0405						
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000						
Mobile	0.4923	0.6567	4.6755	0.0127	0.7137	9.5600e-003	0.7233	0.1807	8.9200e-003	0.1896						
Waste						0.0000	0.0000		0.0000	0.0000						
Water						0.0000	0.0000		0.0000	0.0000						
Total	4.2423	0.7408	11.9752	0.0131	0.7137	0.0501	0.7638	0.1807	0.0494	0.2301						

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	7/30/2021	7/29/2021	5	0	
2	Site Preparation	Site Preparation	8/27/2021	8/26/2021	5	0	
3	Grading	Grading	9/10/2021	9/9/2021	5	0	

SF Housing Element - Typology 1 - San Francisco County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.4923	0.6567	4.6755	0.0127	0.7137	9.5600e-003	0.7233	0.1807	8.9200e-003	0.1896						
Unmitigated	0.4923	0.6567	4.6755	0.0127	0.7137	9.5600e-003	0.7233	0.1807	8.9200e-003	0.1896						

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Apartments High Rise	1,083.85	1,103.34	874.39	2,440,590	2,440,590
Strip Mall	439.73	417.11	202.70	620,080	620,080
Total	1,523.59	1,520.45	1,077.09	3,060,671	3,060,671

4.3 Trip Type Information

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Apartments High Rise	10.80	4.80	5.70	31.00	15.00	54.00	86	11	3
Strip Mall	9.50	7.30	7.30	16.60	64.40	19.00	45	40	15

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Apartments High Rise	0.528450	0.040108	0.234894	0.112535	0.027509	0.006701	0.017284	0.012460	0.005344	0.007768	0.005468	0.001050	0.000429
Strip Mall	0.528450	0.040108	0.234894	0.112535	0.027509	0.006701	0.017284	0.012460	0.005344	0.007768	0.005468	0.001050	0.000429

SF Housing Element - Typology 2 - San Francisco County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**6.2 Area by SubCategory****Unmitigated**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.3505					0.0000	0.0000		0.0000	0.0000						
Consumer Products	1.4753					0.0000	0.0000		0.0000	0.0000						
Hearth	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000						
Landscaping	0.1103	0.0423	3.6720	1.9000e-004		0.0204	0.0204		0.0204	0.0204						
Total	1.9361	0.0423	3.6720	1.9000e-004		0.0204	0.0204		0.0204	0.0204						

SF Housing Element - Typology 2 - San Francisco County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**6.2 Area by SubCategory****Mitigated**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.3505					0.0000	0.0000		0.0000	0.0000						
Consumer Products	1.4753					0.0000	0.0000		0.0000	0.0000						
Hearth	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000						
Landscaping	0.1103	0.0423	3.6720	1.9000e-004		0.0204	0.0204		0.0204	0.0204						
Total	1.9361	0.0423	3.6720	1.9000e-004		0.0204	0.0204		0.0204	0.0204						

7.0 Water Detail**7.1 Mitigation Measures Water**

SF Housing Element - Typology 2 - San Francisco County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**SF Housing Element - Typology 2****San Francisco County, Annual****1.0 Project Characteristics****1.1 Land Usage**

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Apartments High Rise	495.00	Dwelling Unit	7.98	495,000.00	1416
Strip Mall	4.00	1000sqft	0.09	4,000.00	0

1.2 Other Project Characteristics

Urbanization	Urban	Wind Speed (m/s)	4.6	Precipitation Freq (Days)	64
Climate Zone	5			Operational Year	2025
Utility Company	Pacific Gas and Electric Company				
CO2 Intensity (lb/MWhr)	203.98	CH4 Intensity (lb/MWhr)	0.033	N2O Intensity (lb/MWhr)	0.004

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use - Typology Land Uses Only

Construction Phase - Operational emissions only

Grading -

Vehicle Trips - Weekday trip rates provided by SFEP from the SFCTA Travel Demand Tool for each typology and district including auto and TNC/taxi modes. Trip lengths and types are from CalEEMod defaults. Weekend trip rates are scaled by CalEEMod default ratios between weekend/weekday.

Vehicle Emission Factors - EMFAC2021 outputs converted to CalEEMod EFs

Vehicle Emission Factors - EMFAC2021 outputs converted to CalEEMod EFs

Vehicle Emission Factors - EMFAC2021 outputs converted to CalEEMod EFs

Road Dust - Updated silt loading factor for SF county from CARB 2018 Miscellaneous Process Methodology 7.9 for Entrained Road Travel, Paved Road Dust.

Woodstoves - Natural gas fireplaces or woodstoves are not allowed in new San Francisco buildings.

SF Housing Element - Typology 2 - San Francisco County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Consumer Products - CalEEMod default missions factor assumes 2008 statewide VOC inventory and building square footage. An updated 2017 VOC inventory from CARB and population estimates based on the CA DOF demographic projections were used to estimate a statewide VOC EF for 2017.

Energy Use - San Francisco has banned the installation of new natural gas infrastructure in residential buildings.

Fleet Mix - EMFAC2021 outputs converted to CalEEMod fleet mix

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	20.00	0.00
tblConstructionPhase	NumDays	230.00	0.00
tblConstructionPhase	NumDays	20.00	0.00
tblConstructionPhase	NumDays	20.00	0.00
tblConstructionPhase	NumDays	20.00	0.00
tblConstructionPhase	NumDays	10.00	0.00
tblConsumerProducts	ROG_EF	2.14E-05	1.62E-05
tblEnergyUse	NT24NG	2,615.00	0.00
tblEnergyUse	NT24NG	0.70	0.00
tblEnergyUse	T24NG	5,828.01	0.00
tblEnergyUse	T24NG	3.86	0.00
tblFireplaces	FireplaceDayYear	11.14	0.00
tblFireplaces	FireplaceHourDay	3.50	0.00
tblFireplaces	FireplaceWoodMass	228.80	0.00
tblFireplaces	NumberGas	74.25	0.00
tblFireplaces	NumberNoFireplace	19.80	610.00
tblFireplaces	NumberWood	84.15	0.00
tblFleetMix	HHD	4.2330e-003	0.01
tblFleetMix	HHD	4.2330e-003	0.01
tblFleetMix	LDA	0.56	0.53
tblFleetMix	LDA	0.56	0.53
tblFleetMix	LDT1	0.06	0.04
tblFleetMix	LDT1	0.06	0.04
tblFleetMix	LDT2	0.19	0.23

SF Housing Element - Typology 2 - San Francisco County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)
		Highest		

2.2 Overall Operational**Unmitigated Operational**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	1.9361	0.0423	3.6720	1.9000e-004		0.0204	0.0204		0.0204	0.0204						
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000						
Mobile	0.2356	0.3257	2.3118	6.4100e-003	0.3624	4.8100e-003	0.3672	0.0917	4.4900e-003	0.0962						
Waste						0.0000	0.0000		0.0000	0.0000						
Water						0.0000	0.0000		0.0000	0.0000						
Total	2.1717	0.3680	5.9838	6.6000e-003	0.3624	0.0252	0.3876	0.0917	0.0249	0.1166						

SF Housing Element - Typology 2 - San Francisco County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

2.2 Overall Operational

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	1.9361	0.0423	3.6720	1.9000e-004		0.0204	0.0204		0.0204	0.0204						
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000						
Mobile	0.2356	0.3257	2.3118	6.4100e-003	0.3624	4.8100e-003	0.3672	0.0917	4.4900e-003	0.0962						
Waste						0.0000	0.0000		0.0000	0.0000						
Water						0.0000	0.0000		0.0000	0.0000						
Total	2.1717	0.3680	5.9838	6.6000e-003	0.3624	0.0252	0.3876	0.0917	0.0249	0.1166						

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	7/30/2021	7/29/2021	5	0	
2	Site Preparation	Site Preparation	8/27/2021	8/26/2021	5	0	
3	Grading	Grading	9/10/2021	9/9/2021	5	0	

SF Housing Element - Typology 2 - San Francisco County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.2356	0.3257	2.3118	6.4100e-003	0.3624	4.8100e-003	0.3672	0.0917	4.4900e-003	0.0962						
Unmitigated	0.2356	0.3257	2.3118	6.4100e-003	0.3624	4.8100e-003	0.3672	0.0917	4.4900e-003	0.0962						

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Apartments High Rise	653.40	663.30	524.70	1,469,900	1,469,900
Strip Mall	59.64	56.56	27.48	84,095	84,095
Total	713.04	719.86	552.18	1,553,995	1,553,995

4.3 Trip Type Information

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Apartments High Rise	10.80	4.80	5.70	31.00	15.00	54.00	86	11	3
Strip Mall	9.50	7.30	7.30	16.60	64.40	19.00	45	40	15

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Strip Mall	0.528450	0.040108	0.234894	0.112535	0.027509	0.006701	0.017284	0.012460	0.005344	0.007768	0.005468	0.001050	0.000429
Apartments High Rise	0.528450	0.040108	0.234894	0.112535	0.027509	0.006701	0.017284	0.012460	0.005344	0.007768	0.005468	0.001050	0.000429

SF Housing Element - Typology 2 - San Francisco County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**6.2 Area by SubCategory****Unmitigated**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.3505					0.0000	0.0000		0.0000	0.0000						
Consumer Products	1.4753					0.0000	0.0000		0.0000	0.0000						
Hearth	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000						
Landscaping	0.1103	0.0423	3.6720	1.9000e-004		0.0204	0.0204		0.0204	0.0204						
Total	1.9361	0.0423	3.6720	1.9000e-004		0.0204	0.0204		0.0204	0.0204						

SF Housing Element - Typology 2 - San Francisco County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**6.2 Area by SubCategory****Mitigated**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.3505					0.0000	0.0000		0.0000	0.0000						
Consumer Products	1.4753					0.0000	0.0000		0.0000	0.0000						
Hearth	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000						
Landscaping	0.1103	0.0423	3.6720	1.9000e-004		0.0204	0.0204		0.0204	0.0204						
Total	1.9361	0.0423	3.6720	1.9000e-004		0.0204	0.0204		0.0204	0.0204						

7.0 Water Detail**7.1 Mitigation Measures Water**

SF Housing Element - Typology 3 - San Francisco County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**SF Housing Element - Typology 3****San Francisco County, Annual****1.0 Project Characteristics****1.1 Land Usage**

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Apartments High Rise	200.00	Dwelling Unit	3.23	200,000.00	572
Strip Mall	3.00	1000sqft	0.07	3,000.00	0

1.2 Other Project Characteristics

Urbanization	Urban	Wind Speed (m/s)	4.6	Precipitation Freq (Days)	64
Climate Zone	5			Operational Year	2025
Utility Company	Pacific Gas and Electric Company				
CO2 Intensity (lb/MWhr)	203.98	CH4 Intensity (lb/MWhr)	0.033	N2O Intensity (lb/MWhr)	0.004

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use - Typology Land Uses Only

Construction Phase - Operational emissions only

Grading -

Vehicle Trips - Weekday trip rates provided by SFEP from the SFCTA Travel Demand Tool for each typology and district including auto and TNC/taxi modes. Trip lengths and types are from CalEEMod defaults. Weekend trip rates are scaled by CalEEMod default ratios between weekend/weekday.

Vehicle Emission Factors - EMFAC2021 outputs converted to CalEEMod EFs

Vehicle Emission Factors - EMFAC2021 outputs converted to CalEEMod EFs

Vehicle Emission Factors - EMFAC2021 outputs converted to CalEEMod EFs

Road Dust - Updated silt loading factor for SF county from CARB 2018 Miscellaneous Process Methodology 7.9 for Entrained Road Travel, Paved Road Dust.

Woodstoves - Natural gas fireplaces or woodstoves are not allowed in new San Francisco buildings.

SF Housing Element - Typology 3 - San Francisco County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Consumer Products - CalEEMod default missions factor assumes 2008 statewide VOC inventory and building square footage. An updated 2017 VOC inventory from CARB and population estimates based on the CA DOF demographic projections were used to estimate a statewide VOC EF for 2017.

Energy Use - San Francisco has banned the installation of new natural gas infrastructure in residential buildings.

Fleet Mix - EMFAC2021 outputs converted to CalEEMod fleet mix

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	18.00	0.00
tblConstructionPhase	NumDays	230.00	0.00
tblConstructionPhase	NumDays	20.00	0.00
tblConstructionPhase	NumDays	8.00	0.00
tblConstructionPhase	NumDays	18.00	0.00
tblConstructionPhase	NumDays	5.00	0.00
tblConsumerProducts	ROG_EF	2.14E-05	1.62E-05
tblEnergyUse	NT24NG	2,615.00	0.00
tblEnergyUse	NT24NG	0.70	0.00
tblEnergyUse	T24NG	5,828.01	0.00
tblEnergyUse	T24NG	3.86	0.00
tblFireplaces	FireplaceDayYear	11.14	0.00
tblFireplaces	FireplaceHourDay	3.50	0.00
tblFireplaces	FireplaceWoodMass	228.80	0.00
tblFireplaces	NumberGas	30.00	0.00
tblFireplaces	NumberNoFireplace	8.00	0.00
tblFireplaces	NumberWood	34.00	0.00
tblFleetMix	HHD	4.2330e-003	0.01
tblFleetMix	HHD	4.2330e-003	0.01
tblFleetMix	LDA	0.56	0.53
tblFleetMix	LDA	0.56	0.53
tblFleetMix	LDT1	0.06	0.04
tblFleetMix	LDT1	0.06	0.04
tblFleetMix	LDT2	0.19	0.23

SF Housing Element - Typology 3 - San Francisco County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)
		Highest		

2.2 Overall Operational**Unmitigated Operational**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	0.7871	0.0171	1.4836	8.0000e-005		8.2300e-003	8.2300e-003		8.2300e-003	8.2300e-003						
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000						
Mobile	0.2799	0.3865	2.7433	7.6100e-003	0.4296	5.7100e-003	0.4353	0.1087	5.3300e-003	0.1141						
Waste						0.0000	0.0000		0.0000	0.0000						
Water						0.0000	0.0000		0.0000	0.0000						
Total	1.0669	0.4036	4.2269	7.6900e-003	0.4296	0.0139	0.4436	0.1087	0.0136	0.1223						

SF Housing Element - Typology 3 - San Francisco County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

2.2 Overall Operational

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	0.7871	0.0171	1.4836	8.0000e-005		8.2300e-003	8.2300e-003		8.2300e-003	8.2300e-003						
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000						
Mobile	0.2799	0.3865	2.7433	7.6100e-003	0.4296	5.7100e-003	0.4353	0.1087	5.3300e-003	0.1141						
Waste						0.0000	0.0000		0.0000	0.0000						
Water						0.0000	0.0000		0.0000	0.0000						
Total	1.0669	0.4036	4.2269	7.6900e-003	0.4296	0.0139	0.4436	0.1087	0.0136	0.1223						

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	7/30/2021	7/29/2021	5	0	
2	Site Preparation	Site Preparation	8/27/2021	8/26/2021	5	0	
3	Grading	Grading	9/10/2021	9/9/2021	5	0	

SF Housing Element - Typology 3 - San Francisco County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**3.7 Architectural Coating - 2023****Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

4.0 Operational Detail - Mobile**4.1 Mitigation Measures Mobile**

SF Housing Element - Typology 3 - San Francisco County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.2799	0.3865	2.7433	7.6100e-003	0.4296	5.7100e-003	0.4353	0.1087	5.3300e-003	0.1141						
Unmitigated	0.2799	0.3865	2.7433	7.6100e-003	0.4296	5.7100e-003	0.4353	0.1087	5.3300e-003	0.1141						

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Apartments High Rise	770.00	784.00	622.00	1,734,185	1,734,185
Strip Mall	76.78	72.83	35.39	108,271	108,271
Total	846.78	856.83	657.39	1,842,456	1,842,456

4.3 Trip Type Information

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Apartments High Rise	10.80	4.80	5.70	31.00	15.00	54.00	86	11	3
Strip Mall	9.50	7.30	7.30	16.60	64.40	19.00	45	40	15

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Apartments High Rise	0.528450	0.040108	0.234894	0.112535	0.027509	0.006701	0.017284	0.012460	0.005344	0.007768	0.005468	0.001050	0.000429
Strip Mall	0.528450	0.040108	0.234894	0.112535	0.027509	0.006701	0.017284	0.012460	0.005344	0.007768	0.005468	0.001050	0.000429

SF Housing Element - Typology 3 - San Francisco County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**6.2 Area by SubCategory****Unmitigated**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.1424					0.0000	0.0000		0.0000	0.0000						
Consumer Products	0.6002					0.0000	0.0000		0.0000	0.0000						
Hearth	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000						
Landscaping	0.0446	0.0171	1.4836	8.0000e-005		8.2300e-003	8.2300e-003		8.2300e-003	8.2300e-003						
Total	0.7871	0.0171	1.4836	8.0000e-005		8.2300e-003	8.2300e-003		8.2300e-003	8.2300e-003						

SF Housing Element - Typology 3 - San Francisco County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**6.2 Area by SubCategory****Mitigated**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.1424					0.0000	0.0000		0.0000	0.0000						
Consumer Products	0.6002					0.0000	0.0000		0.0000	0.0000						
Hearth	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000						
Landscaping	0.0446	0.0171	1.4836	8.0000e-005		8.2300e-003	8.2300e-003		8.2300e-003	8.2300e-003						
Total	0.7871	0.0171	1.4836	8.0000e-005		8.2300e-003	8.2300e-003		8.2300e-003	8.2300e-003						

7.0 Water Detail**7.1 Mitigation Measures Water**

SF Housing Element - Typology 4 - San Francisco County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**SF Housing Element - Typology 4****San Francisco County, Annual****1.0 Project Characteristics****1.1 Land Usage**

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Apartments Mid Rise	50.00	Dwelling Unit	1.32	50,000.00	143

1.2 Other Project Characteristics

Urbanization	Urban	Wind Speed (m/s)	4.6	Precipitation Freq (Days)	64
Climate Zone	5			Operational Year	2025
Utility Company	Pacific Gas and Electric Company				
CO2 Intensity (lb/MWhr)	203.98	CH4 Intensity (lb/MWhr)	0.033	N2O Intensity (lb/MWhr)	0.004

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use - Typology Land Uses Only

Construction Phase - Operational emissions only

Grading -

Vehicle Trips - Weekday trip rates provided by SFEP from the SFCTA Travel Demand Tool for each typology and district including auto and TNC/taxi modes. Trip lengths and types are from CalEEMod defaults. Weekend trip rates are scaled by CalEEMod default ratios between weekend/weekday.

Vehicle Emission Factors - EMFAC2021 outputs converted to CalEEMod EFs

Vehicle Emission Factors - EMFAC2021 outputs converted to CalEEMod EFs

Vehicle Emission Factors - EMFAC2021 outputs converted to CalEEMod EFs

Road Dust - Updated silt loading factor for SF county from CARB 2018 Miscellaneous Process Methodology 7.9 for Entrained Road Travel, Paved Road Dust.

Woodstoves - Natural gas fireplaces or woodstoves are not allowed in new San Francisco buildings.

SF Housing Element - Typology 4 - San Francisco County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Consumer Products - CalEEMod default missions factor assumes 2008 statewide VOC inventory and building square footage. An updated 2017 VOC inventory from CARB and population estimates based on the CA DOF demographic projections were used to estimate a statewide VOC EF for 2017.

Energy Use - San Francisco has banned the installation of new natural gas infrastructure in residential buildings.

Fleet Mix - EMFAC2021 outputs converted to CalEEMod fleet mix

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	10.00	0.00
tblConstructionPhase	NumDays	200.00	0.00
tblConstructionPhase	NumDays	20.00	0.00
tblConstructionPhase	NumDays	4.00	0.00
tblConstructionPhase	NumDays	10.00	0.00
tblConstructionPhase	NumDays	2.00	0.00
tblConsumerProducts	ROG_EF	2.14E-05	1.62E-05
tblEnergyUse	NT24NG	2,615.00	0.00
tblEnergyUse	T24NG	5,828.01	0.00
tblFireplaces	FireplaceDayYear	11.14	0.00
tblFireplaces	FireplaceHourDay	3.50	0.00
tblFireplaces	FireplaceWoodMass	228.80	0.00
tblFireplaces	NumberGas	7.50	0.00
tblFireplaces	NumberNoFireplace	2.00	610.00
tblFireplaces	NumberWood	8.50	0.00
tblFleetMix	HHD	4.2330e-003	0.01
tblFleetMix	LDA	0.56	0.53
tblFleetMix	LDT1	0.06	0.04
tblFleetMix	LDT2	0.19	0.23
tblFleetMix	LHD1	0.02	0.03
tblFleetMix	LHD2	5.0320e-003	6.7010e-003
tblFleetMix	MCY	0.03	5.4680e-003
tblFleetMix	MDV	0.10	0.11
tblFleetMix	MH	1.7150e-003	4.2900e-004

SF Housing Element - Typology 4 - San Francisco County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)
		Highest		

2.2 Overall Operational**Unmitigated Operational**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	0.1942	4.2700e-003	0.3709	2.0000e-005		2.0600e-003	2.0600e-003		2.0600e-003	2.0600e-003						
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000						
Mobile	0.0294	0.0413	0.2926	8.2000e-004	0.0463	6.1000e-004	0.0469	0.0117	5.7000e-004	0.0123						
Waste						0.0000	0.0000		0.0000	0.0000						
Water						0.0000	0.0000		0.0000	0.0000						
Total	0.2236	0.0455	0.6635	8.4000e-004	0.0463	2.6700e-003	0.0490	0.0117	2.6300e-003	0.0144						

SF Housing Element - Typology 4 - San Francisco County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

2.2 Overall Operational

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	0.1942	4.2700e-003	0.3709	2.0000e-005		2.0600e-003	2.0600e-003		2.0600e-003	2.0600e-003						
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000						
Mobile	0.0294	0.0413	0.2926	8.2000e-004	0.0463	6.1000e-004	0.0469	0.0117	5.7000e-004	0.0123						
Waste						0.0000	0.0000		0.0000	0.0000						
Water						0.0000	0.0000		0.0000	0.0000						
Total	0.2236	0.0455	0.6635	8.4000e-004	0.0463	2.6700e-003	0.0490	0.0117	2.6300e-003	0.0144						

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	7/30/2021	7/29/2021	5	0	
2	Site Preparation	Site Preparation	8/27/2021	8/26/2021	5	0	
3	Grading	Grading	9/10/2021	9/9/2021	5	0	

SF Housing Element - Typology 4 - San Francisco County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.0294	0.0413	0.2926	8.2000e-004	0.0463	6.1000e-004	0.0469	0.0117	5.7000e-004	0.0123						
Unmitigated	0.0294	0.0413	0.2926	8.2000e-004	0.0463	6.1000e-004	0.0469	0.0117	5.7000e-004	0.0123						

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Apartments Mid Rise	90.50	81.50	68.00	198,626	198,626
Total	90.50	81.50	68.00	198,626	198,626

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Apartments Mid Rise	10.80	4.80	5.70	31.00	15.00	54.00	86	11	3

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Apartments Mid Rise	0.528450	0.040108	0.234894	0.112535	0.027509	0.006701	0.017284	0.012460	0.005344	0.007768	0.005468	0.001050	0.000429

SF Housing Element - Typology 4 - San Francisco County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.1942	4.2700e-003	0.3709	2.0000e-005		2.0600e-003	2.0600e-003		2.0600e-003	2.0600e-003						
Unmitigated	0.1942	4.2700e-003	0.3709	2.0000e-005		2.0600e-003	2.0600e-003		2.0600e-003	2.0600e-003						

6.2 Area by SubCategory**Unmitigated**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.0352					0.0000	0.0000		0.0000	0.0000						
Consumer Products	0.1478					0.0000	0.0000		0.0000	0.0000						
Hearth	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000						
Landscaping	0.0111	4.2700e-003	0.3709	2.0000e-005		2.0600e-003	2.0600e-003		2.0600e-003	2.0600e-003						
Total	0.1942	4.2700e-003	0.3709	2.0000e-005		2.0600e-003	2.0600e-003		2.0600e-003	2.0600e-003						

SF Housing Element - Typology 4 - San Francisco County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**6.2 Area by SubCategory****Mitigated**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.0352					0.0000	0.0000		0.0000	0.0000						
Consumer Products	0.1478					0.0000	0.0000		0.0000	0.0000						
Hearth	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000						
Landscaping	0.0111	4.2700e-003	0.3709	2.0000e-005		2.0600e-003	2.0600e-003		2.0600e-003	2.0600e-003						
Total	0.1942	4.2700e-003	0.3709	2.0000e-005		2.0600e-003	2.0600e-003		2.0600e-003	2.0600e-003						

7.0 Water Detail**7.1 Mitigation Measures Water**

SF Housing Element - Typology 5 - San Francisco County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**SF Housing Element - Typology 5****San Francisco County, Annual****1.0 Project Characteristics****1.1 Land Usage**

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Apartments Mid Rise	29.00	Dwelling Unit	0.76	29,000.00	83

1.2 Other Project Characteristics

Urbanization	Urban	Wind Speed (m/s)	4.6	Precipitation Freq (Days)	64
Climate Zone	5			Operational Year	2025
Utility Company	Pacific Gas and Electric Company				
CO2 Intensity (lb/MWhr)	203.98	CH4 Intensity (lb/MWhr)	0.033	N2O Intensity (lb/MWhr)	0.004

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use - Typology Land Uses Only

Construction Phase - Operational emissions only

Grading -

Vehicle Trips - Weekday trip rates provided by SFEP from the SFCTA Travel Demand Tool for each typology and district including auto and TNC/taxi modes. Trip lengths and types are from CalEEMod defaults. Weekend trip rates are scaled by CalEEMod default ratios between weekend/weekday.

Vehicle Emission Factors - EMFAC2021 outputs converted to CalEEMod EFs

Vehicle Emission Factors - EMFAC2021 outputs converted to CalEEMod EFs

Vehicle Emission Factors - EMFAC2021 outputs converted to CalEEMod EFs

Road Dust - Updated silt loading factor for SF county from CARB 2018 Miscellaneous Process Methodology 7.9 for Entrained Road Travel, Paved Road Dust.

Woodstoves - Natural gas fireplaces or woodstoves are not allowed in new San Francisco buildings.

SF Housing Element - Typology 5 - San Francisco County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Consumer Products - CalEEMod default missions factor assumes 2008 statewide VOC inventory and building square footage. An updated 2017 VOC inventory from CARB and population estimates based on the CA DOF demographic projections were used to estimate a statewide VOC EF for 2017.

Energy Use - San Francisco has banned the installation of new natural gas infrastructure in residential buildings.

Fleet Mix - EMFAC2021 outputs converted to CalEEMod fleet mix

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	5.00	0.00
tblConstructionPhase	NumDays	100.00	0.00
tblConstructionPhase	NumDays	10.00	0.00
tblConstructionPhase	NumDays	2.00	0.00
tblConstructionPhase	NumDays	5.00	0.00
tblConstructionPhase	NumDays	1.00	0.00
tblConsumerProducts	ROG_EF	2.14E-05	1.62E-05
tblEnergyUse	NT24NG	2,615.00	0.00
tblEnergyUse	T24NG	5,828.01	0.00
tblFireplaces	FireplaceDayYear	11.14	0.00
tblFireplaces	FireplaceHourDay	3.50	0.00
tblFireplaces	FireplaceWoodMass	228.80	0.00
tblFireplaces	NumberGas	4.35	0.00
tblFireplaces	NumberNoFireplace	1.16	610.00
tblFireplaces	NumberWood	4.93	0.00
tblFleetMix	HHD	4.2330e-003	0.01
tblFleetMix	LDA	0.56	0.53
tblFleetMix	LDT1	0.06	0.04
tblFleetMix	LDT2	0.19	0.23
tblFleetMix	LHD1	0.02	0.03
tblFleetMix	LHD2	5.0320e-003	6.7010e-003
tblFleetMix	MCY	0.03	5.4680e-003
tblFleetMix	MDV	0.10	0.11
tblFleetMix	MH	1.7150e-003	4.2900e-004

SF Housing Element - Typology 5 - San Francisco County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)
		Highest		

2.2 Overall Operational**Unmitigated Operational**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	0.1126	2.4800e-003	0.2151	1.0000e-005		1.1900e-003	1.1900e-003		1.1900e-003	1.1900e-003						
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000						
Mobile	0.0182	0.0255	0.1810	5.1000e-004	0.0287	3.8000e-004	0.0290	7.2500e-003	3.5000e-004	7.6100e-003						
Waste						0.0000	0.0000		0.0000	0.0000						
Water						0.0000	0.0000		0.0000	0.0000						
Total	0.1308	0.0280	0.3961	5.2000e-004	0.0287	1.5700e-003	0.0302	7.2500e-003	1.5400e-003	8.8000e-003						

SF Housing Element - Typology 5 - San Francisco County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

2.2 Overall Operational

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	0.1126	2.4800e-003	0.2151	1.0000e-005		1.1900e-003	1.1900e-003		1.1900e-003	1.1900e-003						
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000						
Mobile	0.0182	0.0255	0.1810	5.1000e-004	0.0287	3.8000e-004	0.0290	7.2500e-003	3.5000e-004	7.6100e-003						
Waste						0.0000	0.0000		0.0000	0.0000						
Water						0.0000	0.0000		0.0000	0.0000						
Total	0.1308	0.0280	0.3961	5.2000e-004	0.0287	1.5700e-003	0.0302	7.2500e-003	1.5400e-003	8.8000e-003						

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	7/30/2021	7/29/2021	5	0	
2	Site Preparation	Site Preparation	8/27/2021	8/26/2021	5	0	
3	Grading	Grading	9/10/2021	9/9/2021	5	0	

SF Housing Element - Typology 5 - San Francisco County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.0182	0.0255	0.1810	5.1000e-004	0.0287	3.8000e-004	0.0290	7.2500e-003	3.5000e-004	7.6100e-003						
Unmitigated	0.0182	0.0255	0.1810	5.1000e-004	0.0287	3.8000e-004	0.0290	7.2500e-003	3.5000e-004	7.6100e-003						

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Apartments Mid Rise	55.97	50.46	42.05	122,858	122,858
Total	55.97	50.46	42.05	122,858	122,858

4.3 Trip Type Information

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Apartments Mid Rise	10.80	4.80	5.70	31.00	15.00	54.00	86	11	3

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Apartments Mid Rise	0.528450	0.040108	0.234894	0.112535	0.027509	0.006701	0.017284	0.012460	0.005344	0.007768	0.005468	0.001050	0.000429

SF Housing Element - Typology 5 - San Francisco County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.1126	2.4800e-003	0.2151	1.0000e-005		1.1900e-003	1.1900e-003		1.1900e-003	1.1900e-003						
Unmitigated	0.1126	2.4800e-003	0.2151	1.0000e-005		1.1900e-003	1.1900e-003		1.1900e-003	1.1900e-003						

6.2 Area by SubCategory**Unmitigated**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.0204					0.0000	0.0000		0.0000	0.0000						
Consumer Products	0.0857					0.0000	0.0000		0.0000	0.0000						
Hearth	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000						
Landscaping	6.4600e-003	2.4800e-003	0.2151	1.0000e-005		1.1900e-003	1.1900e-003		1.1900e-003	1.1900e-003						
Total	0.1126	2.4800e-003	0.2151	1.0000e-005		1.1900e-003	1.1900e-003		1.1900e-003	1.1900e-003						

SF Housing Element - Typology 5 - San Francisco County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**6.2 Area by SubCategory****Mitigated**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.0204					0.0000	0.0000		0.0000	0.0000						
Consumer Products	0.0857					0.0000	0.0000		0.0000	0.0000						
Hearth	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000						
Landscaping	6.4600e-003	2.4800e-003	0.2151	1.0000e-005		1.1900e-003	1.1900e-003		1.1900e-003	1.1900e-003						
Total	0.1126	2.4800e-003	0.2151	1.0000e-005		1.1900e-003	1.1900e-003		1.1900e-003	1.1900e-003						

7.0 Water Detail**7.1 Mitigation Measures Water**

SF Housing Element - Typology 6 - San Francisco County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**SF Housing Element - Typology 6****San Francisco County, Annual****1.0 Project Characteristics****1.1 Land Usage**

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Apartments Mid Rise	30.00	Dwelling Unit	0.79	30,000.00	86

1.2 Other Project Characteristics

Urbanization	Urban	Wind Speed (m/s)	4.6	Precipitation Freq (Days)	64
Climate Zone	5			Operational Year	2025
Utility Company	Pacific Gas and Electric Company				
CO2 Intensity (lb/MWhr)	203.98	CH4 Intensity (lb/MWhr)	0.033	N2O Intensity (lb/MWhr)	0.004

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use - Typology Land Uses Only

Construction Phase - Operational emissions only

Grading -

Vehicle Trips - Weekday trip rates provided by SFEP from the SFCTA Travel Demand Tool for each typology and district including auto and TNC/taxi modes. Trip lengths and types are from CalEEMod defaults. Weekend trip rates are scaled by CalEEMod default ratios between weekend/weekday.

Vehicle Emission Factors - EMFAC2021 outputs converted to CalEEMod EFs

Vehicle Emission Factors - EMFAC2021 outputs converted to CalEEMod EFs

Vehicle Emission Factors - EMFAC2021 outputs converted to CalEEMod EFs

Road Dust - Updated silt loading factor for SF county from CARB 2018 Miscellaneous Process Methodology 7.9 for Entrained Road Travel, Paved Road Dust.

Woodstoves - Natural gas fireplaces or woodstoves are not allowed in new San Francisco buildings.

SF Housing Element - Typology 6 - San Francisco County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

Consumer Products - CalEEMod default missions factor assumes 2008 statewide VOC inventory and building square footage. An updated 2017 VOC inventory from CARB and population estimates based on the CA DOF demographic projections were used to estimate a statewide VOC EF for 2017.

Energy Use - San Francisco has banned the installation of new natural gas infrastructure in residential buildings.

Fleet Mix - EMFAC2021 outputs converted to CalEEMod fleet mix

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	5.00	0.00
tblConstructionPhase	NumDays	100.00	0.00
tblConstructionPhase	NumDays	10.00	0.00
tblConstructionPhase	NumDays	2.00	0.00
tblConstructionPhase	NumDays	5.00	0.00
tblConstructionPhase	NumDays	1.00	0.00
tblConsumerProducts	ROG_EF	2.14E-05	1.62E-05
tblEnergyUse	NT24NG	2,615.00	0.00
tblEnergyUse	T24NG	5,828.01	0.00
tblFireplaces	FireplaceDayYear	11.14	0.00
tblFireplaces	FireplaceHourDay	3.50	0.00
tblFireplaces	FireplaceWoodMass	228.80	0.00
tblFireplaces	NumberGas	4.50	0.00
tblFireplaces	NumberNoFireplace	1.20	610.00
tblFireplaces	NumberWood	5.10	0.00
tblFleetMix	HHD	4.2330e-003	0.01
tblFleetMix	LDA	0.56	0.53
tblFleetMix	LDT1	0.06	0.04
tblFleetMix	LDT2	0.19	0.23
tblFleetMix	LHD1	0.02	0.03
tblFleetMix	LHD2	5.0320e-003	6.7010e-003
tblFleetMix	MCY	0.03	5.4680e-003
tblFleetMix	MDV	0.10	0.11
tblFleetMix	MH	1.7150e-003	4.2900e-004

SF Housing Element - Typology 6 - San Francisco County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)
		Highest		

2.2 Overall Operational**Unmitigated Operational**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	0.1165	2.5600e-003	0.2225	1.0000e-005		1.2300e-003	1.2300e-003		1.2300e-003	1.2300e-003						
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000						
Mobile	0.0182	0.0255	0.1805	5.1000e-004	0.0286	3.8000e-004	0.0290	7.2300e-003	3.5000e-004	7.5900e-003						
Waste						0.0000	0.0000		0.0000	0.0000						
Water						0.0000	0.0000		0.0000	0.0000						
Total	0.1347	0.0280	0.4031	5.2000e-004	0.0286	1.6100e-003	0.0302	7.2300e-003	1.5800e-003	8.8200e-003						

SF Housing Element - Typology 6 - San Francisco County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

2.2 Overall Operational

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	0.1165	2.5600e-003	0.2225	1.0000e-005		1.2300e-003	1.2300e-003		1.2300e-003	1.2300e-003						
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000						
Mobile	0.0182	0.0255	0.1805	5.1000e-004	0.0286	3.8000e-004	0.0290	7.2300e-003	3.5000e-004	7.5900e-003						
Waste						0.0000	0.0000		0.0000	0.0000						
Water						0.0000	0.0000		0.0000	0.0000						
Total	0.1347	0.0280	0.4031	5.2000e-004	0.0286	1.6100e-003	0.0302	7.2300e-003	1.5800e-003	8.8200e-003						

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	7/30/2021	7/29/2021	5	0	
2	Site Preparation	Site Preparation	8/27/2021	8/26/2021	5	0	
3	Grading	Grading	9/10/2021	9/9/2021	5	0	

SF Housing Element - Typology 6 - San Francisco County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.0182	0.0255	0.1805	5.1000e-004	0.0286	3.8000e-004	0.0290	7.2300e-003	3.5000e-004	7.5900e-003						
Unmitigated	0.0182	0.0255	0.1805	5.1000e-004	0.0286	3.8000e-004	0.0290	7.2300e-003	3.5000e-004	7.5900e-003						

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Apartments Mid Rise	55.80	50.40	42.00	122,541	122,541
Total	55.80	50.40	42.00	122,541	122,541

4.3 Trip Type Information

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Apartments Mid Rise	10.80	4.80	5.70	31.00	15.00	54.00	86	11	3

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Apartments Mid Rise	0.528450	0.040108	0.234894	0.112535	0.027509	0.006701	0.017284	0.012460	0.005344	0.007768	0.005468	0.001050	0.000429

SF Housing Element - Typology 6 - San Francisco County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.1165	2.5600e-003	0.2225	1.0000e-005		1.2300e-003	1.2300e-003		1.2300e-003	1.2300e-003						
Unmitigated	0.1165	2.5600e-003	0.2225	1.0000e-005		1.2300e-003	1.2300e-003		1.2300e-003	1.2300e-003						

6.2 Area by SubCategory**Unmitigated**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.0211					0.0000	0.0000		0.0000	0.0000						
Consumer Products	0.0887					0.0000	0.0000		0.0000	0.0000						
Hearth	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000						
Landscaping	6.6800e-003	2.5600e-003	0.2225	1.0000e-005		1.2300e-003	1.2300e-003		1.2300e-003	1.2300e-003						
Total	0.1165	2.5600e-003	0.2225	1.0000e-005		1.2300e-003	1.2300e-003		1.2300e-003	1.2300e-003						

SF Housing Element - Typology 6 - San Francisco County, Annual

EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**6.2 Area by SubCategory****Mitigated**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.0211					0.0000	0.0000		0.0000	0.0000						
Consumer Products	0.0887					0.0000	0.0000		0.0000	0.0000						
Hearth	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000						
Landscaping	6.6800e-003	2.5600e-003	0.2225	1.0000e-005		1.2300e-003	1.2300e-003		1.2300e-003	1.2300e-003						
Total	0.1165	2.5600e-003	0.2225	1.0000e-005		1.2300e-003	1.2300e-003		1.2300e-003	1.2300e-003						

7.0 Water Detail**7.1 Mitigation Measures Water**

APPENDIX B

B-2 HRA INPUTS

Table 1
Emission Factors for On-Road Mobile Sources
San Francisco Housing Element
San Francisco, California

Year	Pollutant	Emission Factors by Trip Type ¹		
	Fleet Mix	Worker	Vendor	Hauling
2023	CH4_IDLEX	--	0.025	0.53
	CH4_RUNEX	0.0037	0.012	0.45
	CH4_STREX	0.080	0.0093	3.9E-08
	CO_IDLEX	--	0.69	4.7
	CO_RUNEX	0.93	0.47	2.7
	CO_STREX	3.8	1.1	0.0055
	CO2_IDLEX	--	173	803
	CO2_RUNEX	317	1,295	1,980
	CO2_STREX	77	9.2	0.063
	N2O_IDLEX	--	0.027	0.14
	N2O_RUNEX	0.0058	0.15	0.32
	N2O_STREX	0.034	0.0064	4.0E-06
	NH3_RUNEX	0.033	0.18	0.26
	NOx_IDLEX	--	1.1	4.1
	NOx_RUNEX	0.064	1.4	3.7
	NOx_STREX	0.30	1.3	2.5
	PM10_EXH_IDLEX	--	0.0025	0.0055
	PM10_EXH_RUNEX	0.0019	0.014	0.024
	PM10_EXH_STREX	0.0023	9.6E-05	2.4E-06
	PM10_FUG_PMBW	0.010	0.046	0.11
	PM10_FUG_PMTW	0.0080	0.012	0.035
	PM25_EXH_IDLEX	--	0.0024	0.0053
	PM25_EXH_RUNEX	0.0017	0.013	0.023
	PM25_EXH_STREX	0.0021	8.9E-05	2.2E-06
	PM25_FUG_PMBW	0.0036	0.016	0.040
	PM25_FUG_PMTW	0.0020	0.0030	0.0087
	ROG_DIURN	0.33	0.026	5.0E-04
	ROG_HOTSOAK	0.10	0.0072	1.5E-04
	ROG_IDLEX	--	0.028	0.25
	ROG_RUNEX	0.016	0.048	0.049
	ROG_RUNLOSS	0.036	0.023	8.1E-04
	ROG_STREX	0.39	0.051	2.1E-07
	SO2_IDLEX	--	0.0016	0.0058
	SO2_RUNEX	0.0031	0.012	0.017
	SO2_STREX	7.6E-04	9.1E-05	6.2E-07
	TOG_DIURN	0.33	0.026	5.0E-04
	TOG_HOTSOAK	0.10	0.0072	1.5E-04
	TOG_IDLEX	--	0.056	0.81
	TOG_RUNEX	0.023	0.068	0.51
	TOG_RUNLOSS	0.036	0.023	8.1E-04
	TOG_STREX	0.43	0.056	2.3E-07

Table 1
Emission Factors for On-Road Mobile Sources
San Francisco Housing Element
San Francisco, California

Year	Pollutant	Emission Factors by Trip Type ¹		
	Fleet Mix	Worker	Vendor	Hauling
2024	CH4_IDLEX	--	0.025	0.52
	CH4_RUNEX	0.0034	0.012	0.43
	CH4_STREX	0.076	0.0086	3.8E-08
	CO_IDLEX	--	0.69	4.7
	CO_RUNEX	0.87	0.41	2.6
	CO_STREX	3.6	1.0	0.0058
	CO2_IDLEX	--	173	795
	CO2_RUNEX	311	1,277	1,934
	CO2_STREX	75	8.6	0.053
	N2O_IDLEX	--	0.027	0.13
	N2O_RUNEX	0.0055	0.15	0.32
	N2O_STREX	0.033	0.0061	2.0E-06
	NH3_RUNEX	0.034	0.18	0.26
	NOx_IDLEX	--	1.1	4.0
	NOx_RUNEX	0.057	1.3	3.5
	NOx_STREX	0.28	1.3	2.6
	PM10_EXH_IDLEX	--	0.0021	0.0051
	PM10_EXH_RUNEX	0.0018	0.012	0.024
	PM10_EXH_STREX	0.0022	8.8E-05	1.6E-06
	PM10_FUG_PMBW	0.010	0.046	0.11
	PM10_FUG_PMTW	0.0080	0.012	0.035
	PM25_EXH_IDLEX	--	0.0020	0.0048
	PM25_EXH_RUNEX	0.0016	0.012	0.023
	PM25_EXH_STREX	0.0020	8.1E-05	1.5E-06
	PM25_FUG_PMBW	0.0035	0.016	0.039
	PM25_FUG_PMTW	0.0020	0.0030	0.0087
	ROG_DIURN	0.32	0.024	3.8E-04
	ROG_HOTSOAK	0.10	0.0065	1.2E-04
	ROG_IDLEX	--	0.027	0.25
	ROG_RUNEX	0.014	0.042	0.045
	ROG_RUNLOSS	0.034	0.020	5.3E-04
	ROG_STREX	0.36	0.047	2.1E-07
	SO2_IDLEX	--	0.0016	0.0057
	SO2_RUNEX	0.0031	0.012	0.016
	SO2_STREX	7.4E-04	8.5E-05	5.2E-07
	TOG_DIURN	0.32	0.024	3.8E-04
	TOG_HOTSOAK	0.10	0.0065	1.2E-04
	TOG_IDLEX	--	0.056	0.80
	TOG_RUNEX	0.020	0.060	0.48
	TOG_RUNLOSS	0.034	0.020	5.3E-04
	TOG_STREX	0.40	0.052	2.3E-07

Table 1
Emission Factors for On-Road Mobile Sources
San Francisco Housing Element
San Francisco, California

Year	Pollutant	Emission Factors by Trip Type ¹		
	Fleet Mix	Worker	Vendor	Hauling
2025	CH4_IDLEX	--	0.026	0.51
	CH4_RUNEX	0.0031	0.012	0.41
	CH4_STREX	0.071	0.0080	4.4E-08
	CO_IDLEX	--	0.69	4.8
	CO_RUNEX	0.82	0.35	2.6
	CO_STREX	3.3	0.91	0.0055
	CO2_IDLEX	--	171	785
	CO2_RUNEX	304	1,255	1,883
	CO2_STREX	73	8.1	0.044
	N2O_IDLEX	--	0.027	0.13
	N2O_RUNEX	0.0051	0.15	0.31
	N2O_STREX	0.032	0.0057	3.1E-06
	NH3_RUNEX	0.034	0.18	0.26
	NOx_IDLEX	--	1.0	3.8
	NOx_RUNEX	0.052	1.2	3.2
	NOx_STREX	0.27	1.3	2.6
	PM10_EXH_IDLEX	--	0.0018	0.0046
	PM10_EXH_RUNEX	0.0017	0.011	0.023
	PM10_EXH_STREX	0.0021	8.0E-05	1.0E-06
	PM10_FUG_PMBW	0.010	0.045	0.11
	PM10_FUG_PMTW	0.0080	0.012	0.035
	PM25_EXH_IDLEX	--	0.0017	0.0044
	PM25_EXH_RUNEX	0.0016	0.010	0.022
	PM25_EXH_STREX	0.0019	7.3E-05	9.5E-07
	PM25_FUG_PMBW	0.0035	0.016	0.039
	PM25_FUG_PMTW	0.0020	0.0030	0.0087
	ROG_DIURN	0.31	0.022	2.9E-04
	ROG_HOTSOAK	0.093	0.0059	8.6E-05
	ROG_IDLEX	--	0.025	0.25
	ROG_RUNEX	0.012	0.036	0.042
	ROG_RUNLOSS	0.033	0.019	3.3E-04
	ROG_STREX	0.34	0.044	2.4E-07
	SO2_IDLEX	--	0.0016	0.0055
	SO2_RUNEX	0.0030	0.012	0.016
	SO2_STREX	7.3E-04	8.0E-05	4.3E-07
	TOG_DIURN	0.31	0.022	2.9E-04
	TOG_HOTSOAK	0.093	0.0059	8.6E-05
	TOG_IDLEX	--	0.0551	0.78
	TOG_RUNEX	0.018	0.053	0.46
	TOG_RUNLOSS	0.033	0.0187	3.3E-04
	TOG_STREX	0.37	0.048	2.6E-07

Table 1
Emission Factors for On-Road Mobile Sources
San Francisco Housing Element
San Francisco, California

Year	Pollutant	Emission Factors by Trip Type ¹		
	Fleet Mix	Worker	Vendor	Hauling
2026	CH4_IDLEX	--	0.027	5.0E-01
	CH4_RUNEX	0.0028	0.012	0.38
	CH4_STREX	0.067	0.0074	4.3E-08
	CO_IDLEX	--	0.69	4.8
	CO_RUNEX	0.77	0.30	2.5
	CO_STREX	3.2	0.84	0.0051
	CO2_IDLEX	--	169	775
	CO2_RUNEX	298	1,232	1,832
	CO2_STREX	72	7.6	0.040
	N2O_IDLEX	--	0.026	0.13
	N2O_RUNEX	0.0049	0.1504	0.30
	N2O_STREX	0.031	0.0054	2.5E-06
	NH3_RUNEX	0.035	0.19	0.27
	NOx_IDLEX	0.000	0.9906	3.7
	NOx_RUNEX	0.047	1.0684	3.0E+00
	NOx_STREX	0.26	1.3	2.6E+00
	PM10_EXH_IDLEX	0.000	0.0015	0.0042
	PM10_EXH_RUNEX	0.002	0.0094	0.022
	PM10_EXH_STREX	0.0020	0.0001	9.8E-07
	PM10_FUG_PMBW	0.010	0.045	1.1E-01
	PM10_FUG_PMTW	0.008	0.012	0.035
	PM25_EXH_IDLEX	0.000	0.0014	0.0040
	PM25_EXH_RUNEX	0.0015	0.0090	2.1E-02
	PM25_EXH_STREX	0.0019	6.8E-05	9.1E-07
	PM25_FUG_PMBW	0.004	0.016	0.039
	PM25_FUG_PMTW	0.002	0.0030	0.0087
	ROG_DIURN	0.30	0.0203	2.5E-04
	ROG_HOTSOAK	0.089	0.0053	7.8E-05
	ROG_IDLEX	0.000	0.0242	0.24
	ROG_RUNEX	0.011	0.0309	3.9E-02
	ROG_RUNLOSS	0.033	0.0173	3.0E-04
	ROG_STREX	0.316	0.0402	2.3E-07
	SO2_IDLEX	0.000	0.0015	5.3E-03
	SO2_RUNEX	0.003	0.0117	1.5E-02
	SO2_STREX	0.001	0.0001	3.9E-07
	TOG_DIURN	0.299	0.0203	2.5E-04
	TOG_HOTSOAK	0.089	0.0053	7.8E-05
	TOG_IDLEX	0.000	0.0545	7.7E-01
	TOG_RUNEX	0.016	0.0474	4.3E-01
	TOG_RUNLOSS	0.033	0.0173	3.0E-04
	TOG_STREX	0.346	0.0440	2.6E-07

Table 1
Emission Factors for On-Road Mobile Sources
San Francisco Housing Element
San Francisco, California

1

Emission factor units are consistent with CalEEMod® default units. Emission factors were derived using CalEEMod® methodology and were estimated using EMFAC2021 for San Francisco County with EMFAC2007 default vehicle categories and fleet mix assumptions. Consistent with CalEEMod® methodology, Ramboll assumed that construction worker trips are 50% Light-Duty Auto (LDA), 25% Light-Duty Truck 1 (LDT1) and 25% LDT2 vehicle classes, vendor trips are 100% diesel Medium-Heavy Duty Trucks (MHDT), and haul trips are 100% diesel Heavy-Heavy Duty Trucks (HHDT).

Table 2
Emission Factors for Offroad Mobile Sources
San Francisco Housing Element
San Francisco, California

CalEEMod Equipment Name	Year	Emission Factor ¹ (g/bhp-hr)				Controlled Emission Factor ² (g/bhp-hr)			
		ROG	NOx	PM ₁₀	PM _{2.5}	ROG	NOx	PM ₁₀	PM _{2.5}
Aerial Lifts	2023	0.10	1.5	0.027	0.025	0.10	1.5	0.0080	0.0080
Aerial Lifts	2024	0.10	1.5	0.026	0.024	0.10	1.5	0.0080	0.0080
Aerial Lifts	2025	0.10	1.5	0.026	0.024	0.10	1.5	0.0080	0.0080
Air Compressors	2023	0.39	2.6	0.14	0.14	0.060	0.26	0.0080	0.0080
Air Compressors	2024	0.37	2.5	0.12	0.12	0.060	0.26	0.0080	0.0080
Air Compressors	2025	0.35	2.3	0.10	0.10	0.060	0.26	0.0080	0.0080
Air Compressors	2026	0.35	2.3	0.10	0.10	0.060	0.26	0.0080	0.0080
Bore/Drill Rigs	2023	0.11	1.0	0.034	0.031	0.060	0.26	0.0080	0.0080
Bore/Drill Rigs	2024	0.11	1.0	0.032	0.030	0.060	0.26	0.0080	0.0080
Cement and Mortar Mixers	2025	0.66	4.1	0.16	0.16	0.12	2.8	0.0080	0.0080
Cement and Mortar Mixers	2024	0.66	4.1	0.16	0.16	0.12	2.8	0.0080	0.0080
Cement and Mortar Mixers	2023	0.66	4.1	0.16	0.16	0.12	2.8	0.0080	0.0080
Concrete/Industrial Saws	2023	0.32	2.5	0.12	0.12	0.060	0.26	0.0080	0.0080
Cranes	2023	0.30	3.2	0.13	0.12	0.060	0.26	0.0080	0.0080
Cranes	2024	0.28	3.0	0.12	0.11	0.060	0.26	0.0080	0.0080
Cranes	2025	0.26	2.7	0.11	0.10	0.060	0.26	0.0080	0.0080
Crawler Tractors	2023	0.28	3.2	0.12	0.11	0.060	0.26	0.0080	0.0080
Crushing/Proc. Equipment	2023	0.39	2.6	0.13	0.13	0.060	0.26	0.0080	0.0080
Dumpers/Tenders	2023	0.69	4.3	0.16	0.16	0.060	0.26	0.0080	0.0080
Dumpers/Tenders	2024	0.69	4.3	0.16	0.16	0.12	2.8	0.0080	0.0080
Excavators	2023	0.18	1.5	0.072	0.066	0.060	0.26	0.0080	0.0080
Excavators	2024	0.17	1.3	0.065	0.060	0.060	0.26	0.0080	0.0080
Forklifts	2023	0.33	3.1	0.19	0.17	0.060	0.26	0.0080	0.0080
Forklifts	2024	0.30	2.8	0.16	0.15	0.060	0.26	0.0080	0.0080
Forklifts	2025	0.28	2.6	0.14	0.13	0.060	0.26	0.0080	0.0080
Generator Sets	2023	0.28	2.5	0.12	0.12	0.060	0.26	0.0080	0.0080
Graders	2023	0.28	3.4	0.11	0.10	0.060	0.26	0.0080	0.0080
Graders	2024	0.26	3.1	0.10	0.092	0.060	0.26	0.0080	0.0080

Table 2
Emission Factors for Offroad Mobile Sources
San Francisco Housing Element
San Francisco, California

CalEEMod Equipment Name	Year	Emission Factor ¹ (g/bhp-hr)				Controlled Emission Factor ² (g/bhp-hr)			
		ROG	NOx	PM ₁₀	PM _{2.5}	ROG	NOx	PM ₁₀	PM _{2.5}
Off-Highway Trucks	2023	0.19	1.3	0.048	0.044	0.060	0.26	0.0080	0.0080
Off-Highway Trucks	2024	0.18	1.2	0.044	0.041	0.060	0.26	0.0080	0.0080
Off-Highway Trucks	2025	0.18	1.1	0.038	0.035	0.060	0.26	0.0080	0.0080
Other General Industrial Equipment	2023	0.31	2.9	0.17	0.16	0.060	0.26	0.0080	0.0080
Other General Industrial Equipment	2024	0.29	2.7	0.15	0.13	0.060	0.26	0.0080	0.0080
Pavers	2025	0.18	1.6	0.077	0.071	0.060	0.26	0.0080	0.0080
Pavers	2024	0.19	1.8	0.084	0.078	0.060	0.26	0.0080	0.0080
Pavers	2023	0.20	2.0	0.092	0.085	0.060	0.26	0.0080	0.0080
Paving Equipment	2025	0.18	1.5	0.075	0.069	0.060	0.26	0.0080	0.0080
Paving Equipment	2023	0.20	1.9	0.093	0.086	0.060	0.26	0.0080	0.0080
Plate Compactors	2023	0.66	4.1	0.16	0.16	0.12	2.8	0.0080	0.0080
Pressure Washers	2025	0.61	4.3	0.18	0.18	0.12	2.8	0.0080	0.0080
Pressure Washers	2023	0.62	4.3	0.19	0.19	0.12	2.8	0.0080	0.0080
Pressure Washers	2024	0.61	4.3	0.18	0.18	0.12	2.8	0.0080	0.0080
Pumps	2023	0.30	2.5	0.12	0.12	0.060	0.26	0.0080	0.0080
Pumps	2024	0.28	2.4	0.11	0.11	0.060	0.26	0.0080	0.0080
Rollers	2024	0.27	2.8	0.15	0.14	0.060	0.26	0.0080	0.0080
Rollers	2023	0.29	3.0	0.17	0.15	0.060	0.26	0.0080	0.0080
Rough Terrain Forklifts	2023	0.15	2.0	0.064	0.059	0.060	0.26	0.0080	0.0080
Rough Terrain Forklifts	2024	0.15	1.9	0.058	0.054	0.060	0.26	0.0080	0.0080
Rough Terrain Forklifts	2025	0.14	1.8	0.051	0.047	0.060	0.26	0.0080	0.0080
Rubber Tired Dozers	2023	0.39	4.1	0.18	0.17	0.060	0.26	0.0080	0.0080
Rubber Tired Loaders	2023	0.21	2.1	0.069	0.063	0.060	0.26	0.0080	0.0080
Rubber Tired Loaders	2024	0.20	1.8	0.060	0.056	0.060	0.26	0.0080	0.0080
Signal Boards	2023	0.66	4.1	0.16	0.16	0.12	2.8	0.0080	0.0080
Skid Steer Loaders	2023	0.15	2.0	0.069	0.063	0.060	0.26	0.0080	0.0080
Sweepers/Scrubbers	2023	0.35	3.3	0.21	0.19	0.12	2.7	0.0080	0.0080
Sweepers/Scrubbers	2024	0.33	3.1	0.19	0.17	0.12	2.7	0.0080	0.0080
Tractors/Loaders/Backhoes	2023	0.24	2.4	0.12	0.11	0.060	0.26	0.0080	0.0080

Table 2
Emission Factors for Offroad Mobile Sources
San Francisco Housing Element
San Francisco, California

CalEEMod Equipment Name	Year	Emission Factor ¹ (g/bhp-hr)				Controlled Emission Factor ² (g/bhp-hr)			
		ROG	NOx	PM ₁₀	PM _{2.5}	ROG	NOx	PM ₁₀	PM _{2.5}
Tractors/Loaders/Backhoes	2024	0.23	2.3	0.11	0.10	0.060	0.26	0.0080	0.0080
Trenchers	2023	0.50	4.7	0.33	0.30	0.060	0.26	0.0080	0.0080
Welders	2023	0.70	3.9	0.15	0.15	0.12	2.8	0.0080	0.0080
Welders	2024	0.65	3.8	0.13	0.13	0.12	2.8	0.0080	0.0080
Welders	2025	0.60	3.7	0.11	0.11	0.12	2.8	0.0080	0.0080

- ^{1.} Emission factors in (g/bhp-hr) were sourced from CalEEMod 2021 for the equipment and years specified in the client's construction schedule.
- ^{2.} For equipment with a mitigated Tier 4 emission factor higher than the default equipment emission factor, the default equipment emission factor was used.

Table 3
Modeled Emission Rates From Construction Sources
San Francisco Housing Element
San Francisco, California

Building Type	Year	Source Type	Phase	Equipment	Uncontrolled Emission Rate (g/s)		Controlled Emission Rate (g/s)	
					DPM	PM _{2.5}	DPM	PM _{2.5}
Type 1	2023	Offroad	Demolition	Air Compressors	1.4E-04	1.4E-04	7.9E-06	7.9E-06
		Offroad	Demolition	Excavators	2.3E-04	2.1E-04	2.5E-05	2.5E-05
		Offroad	Demolition	Generator Sets	1.9E-04	1.9E-04	1.3E-05	1.3E-05
		Onroad	Demolition	Hauling	1.7E-07	1.6E-07	1.7E-07	1.6E-07
		Offroad	Demolition	Signal Boards	1.0E-05	1.0E-05	5.2E-07	5.2E-07
		Onroad	Demolition	Worker	--	3.5E-07	--	3.5E-07
		Offroad	Foundation/Podium Construction	Forklifts	3.3E-04	3.1E-04	1.4E-05	1.4E-05
		Onroad	Foundation/Podium Construction	Hauling	1.6E-06	1.5E-06	1.6E-06	1.5E-06
		Onroad	Foundation/Podium Construction	Worker	--	2.6E-06	--	2.6E-06
		Offroad	Grading, Shoring, & Excavation	Bore/Drill Rigs	5.6E-04	5.2E-04	1.3E-04	1.3E-04
		Offroad	Grading, Shoring, & Excavation	Excavators	8.6E-04	7.9E-04	9.6E-05	9.6E-05
		Offroad	Grading, Shoring, & Excavation	Generator Sets	7.3E-04	7.3E-04	5.0E-05	5.0E-05
		Onroad	Grading, Shoring, & Excavation	Hauling	1.6E-06	1.6E-06	1.6E-06	1.6E-06
		Offroad	Grading, Shoring, & Excavation	Pumps	1.1E-02	1.1E-02	7.2E-04	7.2E-04
		Offroad	Grading, Shoring, & Excavation	Signal Boards	4.0E-05	4.0E-05	2.0E-06	2.0E-06
		Onroad	Grading, Shoring, & Excavation	Worker	--	1.6E-06	--	1.6E-06
	2024	Offroad	Building Construction/Superstructure	Forklifts	4.3E-04	3.9E-04	2.1E-05	2.1E-05
		Onroad	Building Construction/Superstructure	Hauling	2.3E-06	2.2E-06	2.3E-06	2.2E-06
		Onroad	Building Construction/Superstructure	Worker	--	1.1E-05	--	1.1E-05
		Offroad	Foundation/Podium Construction	Forklifts	9.7E-05	8.9E-05	4.8E-06	4.8E-06
		Onroad	Foundation/Podium Construction	Hauling	5.2E-07	5.0E-07	5.2E-07	5.0E-07
		Onroad	Foundation/Podium Construction	Worker	--	8.5E-07	--	8.5E-07
		Offroad	Interior Work	Air Compressors	3.0E-05	3.0E-05	2.0E-06	2.0E-06
		Onroad	Interior Work	Hauling	1.7E-07	1.6E-07	1.7E-07	1.6E-07
		Onroad	Interior Work	Worker	--	1.5E-06	--	1.5E-06
		Offroad	Superstructure/Skin	Forklifts	4.8E-05	4.4E-05	2.3E-06	2.3E-06
		Onroad	Superstructure/Skin	Hauling	2.6E-07	2.4E-07	2.6E-07	2.4E-07
		Onroad	Superstructure/Skin	Worker	--	4.2E-07	--	4.2E-07
	2025	Offroad	Interior Work	Air Compressors	3.1E-04	3.1E-04	2.4E-05	2.4E-05
		Onroad	Interior Work	Hauling	1.9E-06	1.8E-06	1.9E-06	1.8E-06
		Onroad	Interior Work	Worker	--	1.7E-05	--	1.7E-05
		Offroad	Superstructure/Skin	Forklifts	1.7E-04	1.5E-04	9.6E-06	9.6E-06
		Onroad	Superstructure/Skin	Hauling	9.8E-07	9.4E-07	9.8E-07	9.4E-07
		Onroad	Superstructure/Skin	Worker	--	1.6E-06	--	1.6E-06
	2026	Offroad	Interior Work	Air Compressors	5.2E-05	5.2E-05	4.0E-06	4.0E-06
		Onroad	Interior Work	Hauling	3.1E-07	2.9E-07	3.1E-07	2.9E-07
		Onroad	Interior Work	Worker	--	2.8E-06	--	2.8E-06

Table 3
Modeled Emission Rates From Construction Sources
San Francisco Housing Element
San Francisco, California

Building Type	Year	Source Type	Phase	Equipment	Uncontrolled Emission Rate (g/s)		Controlled Emission Rate (g/s)	
					DPM	PM _{2.5}	DPM	PM _{2.5}
Type 2	2023	Offroad	Building Construction	Aerial Lifts	1.2E-04	1.1E-04	3.6E-05	3.6E-05
		Offroad	Building Construction	Cranes	3.0E-04	2.8E-04	1.8E-05	1.8E-05
		Offroad	Building Construction	Forklifts	1.3E-04	1.2E-04	5.4E-06	5.4E-06
		Offroad	Building Construction	Off-Highway Trucks	1.7E-04	1.6E-04	2.9E-05	2.9E-05
		Offroad	Building Construction	Rough Terrain Forklifts	8.6E-05	7.9E-05	1.1E-05	1.1E-05
		Onroad	Building Construction	Vendor	2.2E-07	2.1E-07	2.2E-07	2.1E-07
		Offroad	Building Construction	Welders	3.6E-04	3.6E-04	1.9E-05	1.9E-05
		Onroad	Building Construction	Worker	--	4.7E-06	--	4.7E-06
		Offroad	Excavation Shoring	Aerial Lifts	6.0E-06	5.5E-06	1.8E-06	1.8E-06
		Offroad	Excavation Shoring	Bore/Drill Rigs	4.4E-05	4.0E-05	1.0E-05	1.0E-05
		Offroad	Excavation Shoring	Dumpers/Tenders	6.8E-05	6.8E-05	3.4E-06	3.4E-06
		Offroad	Excavation Shoring	Excavators	4.9E-05	4.5E-05	5.5E-06	5.5E-06
		Onroad	Excavation Shoring	Hauling	2.0E-06	1.9E-06	2.0E-06	1.9E-06
		Offroad	Excavation Shoring	Off-Highway Trucks	1.0E-04	9.6E-05	1.7E-05	1.7E-05
		Offroad	Excavation Shoring	Skid Steer Loaders	2.8E-05	2.6E-05	3.3E-06	3.3E-06
		Offroad	Excavation Shoring	Tractors/Loaders/Backhoes	4.9E-05	4.5E-05	3.3E-06	3.3E-06
		Onroad	Excavation Shoring	Vendor	6.9E-07	6.6E-07	6.9E-07	6.6E-07
		Onroad	Excavation Shoring	Worker	--	1.5E-07	--	1.5E-07
		Offroad	Foundation/Below Grade Construction	Aerial Lifts	6.0E-06	5.5E-06	1.8E-06	1.8E-06
		Offroad	Foundation/Below Grade Construction	Off-Highway Trucks	5.2E-05	4.8E-05	8.7E-06	8.7E-06
		Onroad	Foundation/Below Grade Construction	Vendor	7.9E-08	7.6E-08	7.9E-08	7.6E-08
		Onroad	Foundation/Below Grade Construction	Worker	--	1.5E-07	--	1.5E-07
		Offroad	Site Preparation/Demolition	Excavators	2.2E-05	2.0E-05	2.4E-06	2.4E-06
		Onroad	Site Preparation/Demolition	Hauling	8.9E-07	8.5E-07	8.9E-07	8.5E-07
		Offroad	Site Preparation/Demolition	Off-Highway Trucks	7.4E-05	6.8E-05	1.2E-05	1.2E-05
		Onroad	Site Preparation/Demolition	Vendor	1.8E-07	1.8E-07	1.8E-07	1.8E-07
		Onroad	Site Preparation/Demolition	Worker	--	2.0E-08	--	2.0E-08
	2024	Offroad	Building Construction	Aerial Lifts	2.1E-04	1.9E-04	6.2E-05	6.2E-05
		Offroad	Building Construction	Cranes	4.8E-04	4.4E-04	3.1E-05	3.1E-05
		Offroad	Building Construction	Forklifts	1.9E-04	1.8E-04	9.5E-06	9.5E-06
		Offroad	Building Construction	Off-Highway Trucks	2.8E-04	2.6E-04	5.1E-05	5.1E-05
		Offroad	Building Construction	Rough Terrain Forklifts	1.4E-04	1.3E-04	1.9E-05	1.9E-05
		Onroad	Building Construction	Vendor	3.3E-07	3.2E-07	3.3E-07	3.2E-07
		Offroad	Building Construction	Welders	5.4E-04	5.4E-04	3.3E-05	3.3E-05
		Onroad	Building Construction	Worker	--	8.0E-06	--	8.0E-06
		Offroad	Exterior Finishing	Aerial Lifts	8.5E-06	7.8E-06	2.6E-06	2.6E-06
		Offroad	Exterior Finishing	Air Compressors	5.7E-05	5.7E-05	3.7E-06	3.7E-06
		Offroad	Exterior Finishing	Forklifts	4.8E-05	4.4E-05	2.3E-06	2.3E-06
		Onroad	Exterior Finishing	Vendor	4.1E-08	3.9E-08	4.1E-08	3.9E-08
		Offroad	Exterior Finishing	Welders	4.4E-05	4.4E-05	2.7E-06	2.7E-06
		Onroad	Exterior Finishing	Worker	--	1.2E-06	--	1.2E-06

Table 3
Modeled Emission Rates From Construction Sources
San Francisco Housing Element
San Francisco, California

Building Type	Year	Source Type	Phase	Equipment	Uncontrolled Emission Rate (g/s)		Controlled Emission Rate (g/s)	
					DPM	PM _{2.5}	DPM	PM _{2.5}
Type 2	2025	Offroad	Building Construction	Aerial Lifts	1.9E-04	1.7E-04	5.7E-05	5.7E-05
		Offroad	Building Construction	Cranes	4.1E-04	3.8E-04	2.9E-05	2.9E-05
		Offroad	Building Construction	Forklifts	1.5E-04	1.4E-04	8.7E-06	8.7E-06
		Offroad	Building Construction	Off-Highway Trucks	2.2E-04	2.0E-04	4.7E-05	4.7E-05
		Offroad	Building Construction	Rough Terrain Forklifts	1.1E-04	1.0E-04	1.7E-05	1.7E-05
		Onroad	Building Construction	Vendor	2.7E-07	2.5E-07	2.7E-07	2.5E-07
		Offroad	Building Construction	Welders	4.3E-04	4.3E-04	3.0E-05	3.0E-05
		Onroad	Building Construction	Worker	--	7.1E-06	--	7.1E-06
		Offroad	Exterior Finishing	Aerial Lifts	3.1E-05	2.8E-05	9.6E-06	9.6E-06
		Offroad	Exterior Finishing	Air Compressors	1.8E-04	1.8E-04	1.4E-05	1.4E-05
		Offroad	Exterior Finishing	Forklifts	1.5E-04	1.4E-04	8.7E-06	8.7E-06
		Onroad	Exterior Finishing	Vendor	1.3E-07	1.2E-07	1.3E-07	1.2E-07
		Offroad	Exterior Finishing	Welders	1.4E-04	1.4E-04	1.0E-05	1.0E-05
		Onroad	Exterior Finishing	Worker	--	4.1E-06	--	4.1E-06
		Offroad	Site Work/Paving	Cement and Mortar Mixers	1.8E-05	1.8E-05	9.0E-07	9.0E-07
		Offroad	Site Work/Paving	Pavers	9.0E-05	8.3E-05	9.4E-06	9.4E-06
		Offroad	Site Work/Paving	Paving Equipment	7.8E-05	7.2E-05	8.4E-06	8.4E-06
		Offroad	Site Work/Paving	Pressure Washers	1.5E-05	1.5E-05	7.0E-07	7.0E-07
		Onroad	Site Work/Paving	Worker	--	2.0E-07	--	2.0E-07

Table 3
Modeled Emission Rates From Construction Sources
San Francisco Housing Element
San Francisco, California

Building Type	Year	Source Type	Phase	Equipment	Uncontrolled Emission Rate (g/s)		Controlled Emission Rate (g/s)	
					DPM	PM _{2.5}	DPM	PM _{2.5}
Type 3	2023	Offroad	Building Construction	Cranes	1.2E-04	1.1E-04	7.0E-06	7.0E-06
		Offroad	Building Construction	Forklifts	1.3E-04	1.2E-04	5.6E-06	5.6E-06
		Offroad	Building Construction	Tractors/Loaders/Backhoes	2.2E-04	2.1E-04	1.5E-05	1.5E-05
		Onroad	Building Construction	Vendor	5.9E-07	5.6E-07	5.9E-07	5.6E-07
		Onroad	Building Construction	Worker	--	1.5E-06	--	1.5E-06
		Offroad	Demolition	Concrete/Industrial Saws	3.9E-05	3.9E-05	2.5E-06	2.5E-06
		Offroad	Demolition	Rubber Tired Dozers	2.4E-05	2.2E-05	1.1E-06	1.1E-06
		Offroad	Demolition	Tractors/Loaders/Backhoes	3.4E-05	3.2E-05	2.3E-06	2.3E-06
		Onroad	Demolition	Worker	--	1.7E-08	--	1.7E-08
		Offroad	Grading	Concrete/Industrial Saws	7.4E-06	7.4E-06	4.8E-07	4.8E-07
		Onroad	Grading	Hauling	4.6E-07	4.4E-07	4.6E-07	4.4E-07
		Offroad	Grading	Rubber Tired Dozers	4.6E-06	4.2E-06	2.0E-07	2.0E-07
		Offroad	Grading	Tractors/Loaders/Backhoes	6.5E-06	6.0E-06	4.4E-07	4.4E-07
		Onroad	Grading	Worker	--	3.3E-09	--	3.3E-09
		Offroad	Site Preparation	Graders	4.3E-06	4.0E-06	3.1E-07	3.1E-07
		Onroad	Site Preparation	Hauling	1.5E-08	1.4E-08	1.5E-08	1.4E-08
		Offroad	Site Preparation	Tractors/Loaders/Backhoes	2.2E-06	2.0E-06	1.5E-07	1.5E-07
		Onroad	Site Preparation	Worker	--	8.3E-10	--	8.3E-10
	2024	Offroad	Architectural Coating	Air Compressors	9.2E-06	9.2E-06	6.0E-07	6.0E-07
		Onroad	Architectural Coating	Worker	--	2.9E-08	--	2.9E-08
		Offroad	Building Construction	Cranes	1.1E-04	1.0E-04	7.4E-06	7.4E-06
		Offroad	Building Construction	Forklifts	1.2E-04	1.1E-04	5.9E-06	5.9E-06
		Offroad	Building Construction	Tractors/Loaders/Backhoes	2.1E-04	1.9E-04	1.6E-05	1.6E-05
		Onroad	Building Construction	Vendor	5.4E-07	5.1E-07	5.4E-07	5.1E-07
		Onroad	Building Construction	Worker	--	1.5E-06	--	1.5E-06
		Offroad	Paving	Cement and Mortar Mixers	6.5E-06	6.5E-06	3.2E-07	3.2E-07
		Offroad	Paving	Pavers	1.2E-05	1.1E-05	1.2E-06	1.2E-06
		Offroad	Paving	Rollers	1.2E-05	1.1E-05	6.5E-07	6.5E-07
		Offroad	Paving	Tractors/Loaders/Backhoes	1.0E-05	9.2E-06	7.6E-07	7.6E-07
		Onroad	Paving	Worker	--	1.5E-08	--	1.5E-08

Table 3
Modeled Emission Rates From Construction Sources
San Francisco Housing Element
San Francisco, California

Building Type	Year	Source Type	Phase	Equipment	Uncontrolled Emission Rate (g/s)		Controlled Emission Rate (g/s)	
					DPM	PM _{2.5}	DPM	PM _{2.5}
Type 4	2023	Offroad	Architectural Coating	Air Compressors	4.6E-06	4.6E-06	2.6E-07	2.6E-07
		Onroad	Architectural Coating	Worker	--	5.2E-09	--	5.2E-09
		Offroad	Building Construction	Cranes	1.0E-04	9.3E-05	6.0E-06	6.0E-06
		Offroad	Building Construction	Forklifts	1.1E-04	1.0E-04	4.8E-06	4.8E-06
		Offroad	Building Construction	Tractors/Loaders/Backhoes	1.9E-04	1.8E-04	1.3E-05	1.3E-05
		Onroad	Building Construction	Vendor	1.9E-07	1.9E-07	1.9E-07	1.9E-07
		Onroad	Building Construction	Worker	--	5.3E-07	--	5.3E-07
		Offroad	Demolition	Concrete/Industrial Saws	1.7E-05	1.7E-05	1.1E-06	1.1E-06
		Offroad	Demolition	Rubber Tired Dozers	1.0E-05	9.6E-06	4.5E-07	4.5E-07
		Offroad	Demolition	Tractors/Loaders/Backhoes	1.5E-05	1.4E-05	9.8E-07	9.8E-07
		Onroad	Demolition	Worker	--	1.9E-08	--	1.9E-08
		Offroad	Grading	Concrete/Industrial Saws	3.7E-06	3.7E-06	2.4E-07	2.4E-07
		Onroad	Grading	Hauling	3.5E-07	3.3E-07	3.5E-07	3.3E-07
		Offroad	Grading	Rubber Tired Dozers	2.3E-06	2.1E-06	1.0E-07	1.0E-07
		Offroad	Grading	Tractors/Loaders/Backhoes	3.3E-06	3.0E-06	2.2E-07	2.2E-07
		Onroad	Grading	Worker	--	2.7E-09	--	2.7E-09
		Offroad	Paving	Cement and Mortar Mixers	2.8E-06	2.8E-06	1.4E-07	1.4E-07
		Offroad	Paving	Pavers	5.7E-06	5.3E-06	5.0E-07	5.0E-07
		Offroad	Paving	Rollers	5.7E-06	5.3E-06	2.8E-07	2.8E-07
		Offroad	Paving	Tractors/Loaders/Backhoes	4.9E-06	4.5E-06	3.3E-07	3.3E-07
		Onroad	Paving	Worker	--	9.7E-09	--	9.7E-09
		Offroad	Site Preparation	Graders	2.2E-06	2.0E-06	1.6E-07	1.6E-07
		Offroad	Site Preparation	Tractors/Loaders/Backhoes	1.1E-06	1.0E-06	7.3E-08	7.3E-08
		Onroad	Site Preparation	Worker	--	1.3E-09	--	1.3E-09

Table 3
Modeled Emission Rates From Construction Sources
San Francisco Housing Element
San Francisco, California

Building Type	Year	Source Type	Phase	Equipment	Uncontrolled Emission Rate (g/s)		Controlled Emission Rate (g/s)	
					DPM	PM _{2.5}	DPM	PM _{2.5}
Type 5	2023	Offroad	Building Construction	Bore/Drill Rigs	7.7E-06	7.1E-06	1.8E-06	1.8E-06
		Offroad	Building Construction	Cement and Mortar Mixers	3.4E-06	3.4E-06	1.7E-07	1.7E-07
		Offroad	Building Construction	Dumpers/Tenders	8.1E-06	8.1E-06	4.0E-07	4.0E-07
		Offroad	Building Construction	Forklifts	3.5E-06	3.2E-06	1.5E-07	1.5E-07
		Offroad	Building Construction	Other General Industrial Equipment	3.1E-05	2.9E-05	1.5E-06	1.5E-06
		Offroad	Building Construction	Pressure Washers	3.7E-07	3.7E-07	1.6E-08	1.6E-08
		Offroad	Building Construction	Pumps	1.2E-05	1.2E-05	7.7E-07	7.7E-07
		Offroad	Building Construction	Rubber Tired Loaders	3.1E-05	2.9E-05	3.6E-06	3.6E-06
		Offroad	Building Construction	Sweepers/Scrubbers	3.2E-06	3.0E-06	1.2E-07	1.2E-07
		Onroad	Building Construction	Vendor	3.3E-07	3.1E-07	3.3E-07	3.1E-07
		Onroad	Building Construction	Worker	--	7.9E-07	--	7.9E-07
		Offroad	Demolition	Aerial Lifts	9.7E-08	8.9E-08	2.9E-08	2.9E-08
		Offroad	Demolition	Concrete/Industrial Saws	2.3E-05	2.3E-05	1.5E-06	1.5E-06
		Offroad	Demolition	Cranes	6.7E-06	6.2E-06	4.0E-07	4.0E-07
		Offroad	Demolition	Crawler Tractors	8.4E-06	7.7E-06	5.4E-07	5.4E-07
		Offroad	Demolition	Dumpers/Tenders	1.3E-05	1.3E-05	6.3E-07	6.3E-07
		Offroad	Demolition	Excavators	6.9E-06	6.4E-06	7.7E-07	7.7E-07
		Offroad	Demolition	Forklifts	5.4E-06	5.0E-06	2.3E-07	2.3E-07
		Offroad	Demolition	Generator Sets	1.8E-05	1.8E-05	1.2E-06	1.2E-06
		Onroad	Demolition	Hauling	6.9E-07	6.6E-07	6.9E-07	6.6E-07
		Offroad	Demolition	Pumps	4.7E-06	4.7E-06	3.1E-07	3.1E-07
		Offroad	Demolition	Rubber Tired Dozers	2.0E-05	1.8E-05	8.5E-07	8.5E-07
		Offroad	Demolition	Skid Steer Loaders	1.4E-05	1.3E-05	1.6E-06	1.6E-06
		Offroad	Demolition	Tractors/Loaders/Backhoes	1.4E-05	1.3E-05	9.2E-07	9.2E-07
		Offroad	Demolition	Welders	2.5E-06	2.5E-06	1.3E-07	1.3E-07
		Onroad	Demolition	Worker	--	1.5E-07	--	1.5E-07
		Offroad	Drainage/Utilities/Subgrade	Cement and Mortar Mixers	2.5E-07	2.5E-07	1.3E-08	1.3E-08
		Offroad	Drainage/Utilities/Subgrade	Excavators	1.0E-05	9.2E-06	1.1E-06	1.1E-06
		Offroad	Drainage/Utilities/Subgrade	Plate Compactors	4.5E-07	4.5E-07	2.2E-08	2.2E-08
		Offroad	Drainage/Utilities/Subgrade	Rough Terrain Forklifts	3.0E-06	2.7E-06	3.7E-07	3.7E-07
		Offroad	Drainage/Utilities/Subgrade	Trenchers	2.9E-05	2.7E-05	7.2E-07	7.2E-07
		Onroad	Drainage/Utilities/Subgrade	Worker	--	2.5E-07	--	2.5E-07
		Offroad	Excavation & Shoring	Bore/Drill Rigs	1.3E-05	1.2E-05	3.1E-06	3.1E-06
		Offroad	Excavation & Shoring	Crawler Tractors	1.0E-05	9.2E-06	6.5E-07	6.5E-07
		Offroad	Excavation & Shoring	Dumpers/Tenders	5.2E-06	5.2E-06	2.6E-07	2.6E-07
		Offroad	Excavation & Shoring	Excavators	1.5E-05	1.4E-05	1.7E-06	1.7E-06
		Onroad	Excavation & Shoring	Hauling	3.7E-07	3.6E-07	3.7E-07	3.6E-07
		Offroad	Excavation & Shoring	Pumps	1.4E-05	1.4E-05	8.8E-07	8.8E-07
		Onroad	Excavation & Shoring	Worker	--	1.3E-07	--	1.3E-07
		Offroad	Site Preparation & Grading	Crushing/Proc. Equipment	8.5E-06	8.5E-06	5.1E-07	5.1E-07
		Offroad	Site Preparation & Grading	Dumpers/Tenders	8.6E-06	8.6E-06	4.2E-07	4.2E-07
		Offroad	Site Preparation & Grading	Excavators	1.2E-05	1.1E-05	1.3E-06	1.3E-06
		Offroad	Site Preparation & Grading	Pumps	2.1E-05	2.1E-05	1.4E-06	1.4E-06
		Offroad	Site Preparation & Grading	Signal Boards	2.2E-06	2.2E-06	1.1E-07	1.1E-07
		Offroad	Site Preparation & Grading	Sweepers/Scrubbers	4.3E-06	4.0E-06	1.6E-07	1.6E-07
		Offroad	Site Preparation & Grading	Tractors/Loaders/Backhoes	1.2E-05	1.1E-05	8.0E-07	8.0E-07
		Onroad	Site Preparation & Grading	Worker	--	7.0E-08	--	7.0E-08

Table 3
Modeled Emission Rates From Construction Sources
San Francisco Housing Element
San Francisco, California

Building Type	Year	Source Type	Phase	Equipment	Uncontrolled Emission Rate (g/s)		Controlled Emission Rate (g/s)	
					DPM	PM _{2.5}	DPM	PM _{2.5}
Type 5	2024	Offroad	Building Construction	Bore/Drill Rigs	6.3E-07	5.8E-07	1.6E-07	1.6E-07
		Offroad	Building Construction	Cement and Mortar Mixers	2.9E-07	2.9E-07	1.4E-08	1.4E-08
		Offroad	Building Construction	Dumpers/Tenders	7.0E-07	7.0E-07	3.5E-08	3.5E-08
		Offroad	Building Construction	Forklifts	2.6E-07	2.4E-07	1.3E-08	1.3E-08
		Offroad	Building Construction	Other General Industrial Equipment	2.3E-06	2.1E-06	1.3E-07	1.3E-07
		Offroad	Building Construction	Pressure Washers	3.1E-08	3.1E-08	1.4E-09	1.4E-09
		Offroad	Building Construction	Pumps	8.9E-07	8.9E-07	6.6E-08	6.6E-08
		Offroad	Building Construction	Rubber Tired Loaders	2.4E-06	2.2E-06	3.1E-07	3.1E-07
		Offroad	Building Construction	Sweepers/Scrubbers	2.5E-07	2.3E-07	1.1E-08	1.1E-08
		Onroad	Building Construction	Vendor	2.5E-08	2.3E-08	2.5E-08	2.3E-08
		Onroad	Building Construction	Worker	--	6.5E-08	--	6.5E-08
		Offroad	Sitework	Dumpers/Tenders	4.3E-06	4.3E-06	2.2E-07	2.2E-07
		Offroad	Sitework	Excavators	8.7E-06	8.0E-06	1.1E-06	1.1E-06
		Offroad	Sitework	Graders	2.9E-06	2.7E-06	2.3E-07	2.3E-07
		Onroad	Sitework	Hauling	2.2E-07	2.1E-07	2.2E-07	2.1E-07
		Offroad	Sitework	Pressure Washers	7.8E-07	7.8E-07	3.5E-08	3.5E-08
		Offroad	Sitework	Pumps	3.0E-05	3.0E-05	2.2E-06	2.2E-06
		Offroad	Sitework	Sweepers/Scrubbers	1.8E-06	1.6E-06	7.5E-08	7.5E-08
		Offroad	Sitework	Tractors/Loaders/Backhoes	8.4E-06	7.7E-06	6.4E-07	6.4E-07
		Onroad	Sitework	Worker	--	1.7E-07	--	1.7E-07

Table 3
Modeled Emission Rates From Construction Sources
San Francisco Housing Element
San Francisco, California

Building Type	Year	Source Type	Phase	Equipment	Uncontrolled Emission Rate (g/s)		Controlled Emission Rate (g/s)	
					DPM	PM _{2.5}	DPM	PM _{2.5}
Type 6	2023	Offroad	All	Rough Terrain Forklifts	1.4E-04	1.2E-04	1.7E-05	1.7E-05
		Offroad	All	Sweepers/Scrubbers	4.9E-05	4.5E-05	1.9E-06	1.9E-06
		Onroad	All	Vendor	9.5E-08	9.1E-08	9.5E-08	9.1E-08
		Onroad	All	Worker	--	6.5E-07	--	6.5E-07
		Offroad	Demolition	Air Compressors	1.4E-05	1.4E-05	7.6E-07	7.6E-07
		Onroad	Demolition	Hauling	1.1E-07	1.1E-07	1.1E-07	1.1E-07
		Offroad	Demolition	Skid Steer Loaders	3.4E-06	3.1E-06	3.9E-07	3.9E-07
		Onroad	Demolition	Vendor	0.0E+00	0.0E+00	0.0E+00	0.0E+00
		Onroad	Demolition	Worker	--	0.0E+00	--	0.0E+00
		Offroad	Excavation	Crawler Tractors	4.5E-05	4.1E-05	2.9E-06	2.9E-06
		Offroad	Excavation	Excavators	7.2E-05	6.6E-05	8.0E-06	8.0E-06
		Onroad	Excavation	Hauling	2.1E-07	2.0E-07	2.1E-07	2.0E-07
		Offroad	Excavation	Tractors/Loaders/Backhoes	3.5E-05	3.2E-05	2.4E-06	2.4E-06
		Onroad	Excavation	Vendor	0.0E+00	0.0E+00	0.0E+00	0.0E+00
		Onroad	Excavation	Worker	--	0.0E+00	--	0.0E+00
		Offroad	Exterior	Aerial Lifts	1.3E-05	1.2E-05	3.8E-06	3.8E-06
		Offroad	Exterior	Forklifts	4.1E-05	3.8E-05	1.7E-06	1.7E-06
		Offroad	Exterior	Pavers	1.2E-06	1.1E-06	1.1E-07	1.1E-07
		Offroad	Exterior	Paving Equipment	1.1E-06	1.0E-06	9.5E-08	9.5E-08
		Offroad	Exterior	Rollers	9.6E-07	8.8E-07	4.7E-08	4.7E-08
		Onroad	Exterior	Vendor	0.0E+00	0.0E+00	0.0E+00	0.0E+00
		Onroad	Exterior	Worker	--	0.0E+00	--	0.0E+00
		Offroad	Structure	Pumps	6.2E-06	6.2E-06	4.0E-07	4.0E-07
		Onroad	Structure	Vendor	0.0E+00	0.0E+00	0.0E+00	0.0E+00
		Onroad	Structure	Worker	--	0.0E+00	--	0.0E+00
	2024	Offroad	All	Rough Terrain Forklifts	1.9E-05	1.7E-05	2.6E-06	2.6E-06
		Offroad	All	Sweepers/Scrubbers	6.8E-06	6.2E-06	2.9E-07	2.9E-07
		Onroad	All	Vendor	1.3E-08	1.2E-08	1.3E-08	1.2E-08
		Onroad	All	Worker	--	9.6E-08	--	9.6E-08
		Offroad	Structure	Pumps	2.7E-06	2.7E-06	2.0E-07	2.0E-07
		Onroad	Structure	Vendor	0.0E+00	0.0E+00	0.0E+00	0.0E+00
		Onroad	Structure	Worker	--	0.0E+00	--	0.0E+00

Table 4
Modeled Emission Rates From Operational Sources
San Francisco Housing Element
San Francisco, California

Building Type	Source Group	Year ¹	Uncontrolled Emission Rate (g/s)	Controlled Emission Rate (g/s)
			DPM	DPM
Type 1	TYP1G	2022+	6.4E-05	--
Type 2	TYP2G	2022+	3.2E-05	--
Type 3	TYP3G	2022+	2.2E-04	3.0E-05

^{1.} Operational emissions for emergency generators were conservatively modeled for 30 years starting at the third trimester for the maximally exposed receptor. Type 1 and Type 2 generators were only modeled as Tier 4 Final due to regulatory compliance.

APPENDIX B
B-3 AERMOD DATA [PROVIDED
ELECTRONICALLY]

MEMO

Project name **San Francisco Housing Element 2022 Update**
 Project no. **1690017135**
 To **San Francisco Planning Department**
San Francisco, California
 From **Taylor Vencill**
Michael Keinath
Rei Zhang
 Subject **San Francisco Housing Element**
Project Construction Air Quality and Health Risk
Assessment Results for Select Building Types,
October 2022 Update

1 Introduction

October 20, 2022

At the request of ICF International, Ramboll US Consulting, Inc. (Ramboll) is conducting an analysis of criteria air pollutants and precursors and local air quality and health impacts associated with the construction of future developments on sensitive receptors. Details on the alternatives, building types, and construction assumptions are described in the "CEQA Air Quality and Health Risk Methodology" (Ramboll, 2021, referred to hereafter as "Methodology Report") and in the previous typology memo, finalized on November 15, 2021. Additional details on any revised assumptions are presented in this memorandum.

Ramboll
 2200 Powell Street
 Suite 700
 Emeryville, CA 94608
 USA

T +1 510 655 7400
 F +1 510 655 9517
<https://ramboll.com>

As requested in May 2022, Ramboll is performing an update to the previous analysis, as follows: re-analyzing project construction and operation¹ impacts from building types 2, 4, 5, and 6, to 1) evaluate health risks for worker receptors (to supplement the residential receptor analysis already completed), and 2) revise PM_{2.5} concentrations to include fugitive dust from construction.

This technical memorandum presents a brief summary of the methodology, noting any deviations from the Methodology Report and previous methodology, and provides updated results for evaluation of air quality and health impacts from construction of potential building types on offsite sensitive receptors.

2 Methodology

The purpose of this air quality analysis is to assess potential criteria air pollutant emissions and health risks and hazards that would result from the construction of a range of potential building types; and consistent with the guidelines and methodologies from air quality agencies, specifically: Bay Area

¹ Typologies with generators were building types 1, 2, and 3, and construction risks to workers were evaluated for building types 2, 4, 5, and 6; therefore, the only relevant building type for reanalysis of construction and operational risks to workers is building type 2.

Air Quality Management District (air district), California Air Resources Board (CARB), California Office of Environmental Health Hazard Assessment (OEHHA), and USEPA.

The steps conducted in performing this air quality analysis are as follows:

- (1) develop construction and operational emissions inventories for each building type;
- (2) perform air dispersion modeling for pollutant concentrations.

2.1 Building Types Evaluated

Criteria air pollutant (CAP) and toxic air contaminant (TAC) construction emissions resulting from the building types shown in **Table Summary-1** were quantitatively re-evaluated.

Table Summary-1: Building Types

Building Type	Height (feet)	Assumed Land Use Mix	
		Residential (number of dwelling units)	Commercial/Retail (square feet)
Type 2	240	495	4,000
Type 4	85	50	N/A
Type 5	65	29	N/A
Type 6	40	30	N/A

N/A= no applicable land use

Updates to these emissions estimates and the health risk assessment are described in more detail below.

3 Construction Emissions Inventory Development

As described in the Methodology Report, Ramboll primarily utilized the methodology from the California Emissions Estimator Model (CalEEMod®) version 2020.4.02 to assist in quantifying the fugitive PM_{2.5} emissions presented in this report for the selected building types. A Python-based tool was used to perform these calculations, with any additional adjustments for type-specific or site-specific data described in the subsections below.

Details of the land use assumptions, construction schedules, equipment lists, and worker, vendor, and hauling trips, as well as the exhaust-only construction emissions inventory and risk assessment were presented in the Methodology Report and previous memorandum finalized on November 15, 2021. Tables supporting updated calculations for fugitive dust and for additional worker receptors are presented in this memorandum.

The BAAQMD's numeric thresholds for respirable particulate matter (or PM₁₀) and fine particulate matter (or PM_{2.5}) address exhaust PM only; therefore the CAP emissions would not change. For this Project, particulate matter emissions are comprised of two primary sources: (1) PM exhaust emissions from the combustion of fossil fuels by motor vehicles, trucks, or other equipment engines, and (2) fugitive PM from the disturbance of soils (e.g., from construction equipment or wind) that cause dust particles to

² California Air Pollution Control Officers Association, California Emissions Estimator Model®, <http://www.CalEEMod.com/>, accessed November 1, 2021.

become airborne as fugitive dust. **Tables 10-13** shows the fugitive emissions from construction demolition, grading, bulldozing, and truck loading for the selected building types.

3.1 Road Dust

Due to the characteristics of the roads in San Francisco, all roads were assumed to be paved. Ramboll assumed that onroad paved fugitive dust would occur on-site, over a distance of twice the parcel width for each typology.³ These calculations are shown in **Table 9**.

3.2 Fugitive Emissions

Fugitive emissions were calculated using CalEEMod methodology and South Coast Air Quality Management District (SCAQMD) estimates for the dust control measures mandated in the City of San Francisco's Health Code.^{4,5} Dust control measures and corresponding reductions are summarized in **Table Summary-2** below.

Table Summary-2: Control Measures				
SF Dust Control Ordinance, SEC. 1242 (c)	CalEEMod Mitigation Measure	Description of Measure	PM _{2.5} % Reduction	Fugitive Source
(1)	Water Exposed Area	Wetting down areas around soil improvement operations, visibly dry disturbed soil surface areas, and visibly dry disturbed unpaved driveways at least three times per shift per day.	61%	Construction activities
(18)	Clean Paved Roads	Sweeping of surrounding streets during demolition, excavation and construction at least once per day to reduce particulate emissions.	16%	Entrained Road Dust - Paved

4 Updated Construction Health Risk Assessment

The purpose of the human health risk assessment (HRA) is to analyze potential health impacts that would result from construction of building types that could be built in the future. The HRA in this report evaluates the estimated cancer risk and fine particulate matter (PM_{2.5}) concentration associated with

³ This assumption reduces total fugitive PM_{2.5} emissions by roughly 80% if considering full worker, vendor, and haul trips lengths, some of which are greater than 20 miles.

⁴ SCAQMD. 2007. Tables XI a-e. Fugitive Dust Mitigation Measure Examples. Available online at: <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies/fugitive-dust>

⁵ San Francisco Health Code. Article 22B: Construction Dust Control Requirements. Available at: https://codelibrary.amlegal.com/codes/san_francisco/latest/sf_health/0-0-0-4212#JD_1242

construction of each building type, and has been updated with fugitive dust estimates for construction. The methodology for the health risk assessment used is detailed in the Methodology Report.

4.1 Air Dispersion Modeling

As described in the Methodology Report, Ramboll performed refined air dispersion modeling using the American Meteorological Society/USEPA Regulatory Model Improvement Committee Model (AERMOD) (version 21112), with representative meteorological data to determine DPM and PM_{2.5} concentrations for potentially exposed individuals. These concentrations were used to assess the potential human health risk. Updated modeling parameters for fugitive dust were developed using SCAQMD guidance,⁶ and are shown in **Table 7**. For each building type, the maximum exhaust PM_{2.5} concentration and the maximum fugitive PM_{2.5} concentration were assumed to be co-located for each distance, as this is most conservative for a screening level analysis. **Appendix A** contains updated AERMOD input files, meteorological data, and consolidated output files. A summary of the updates to the construction HRA are presented below.

4.2 Exposure Parameters

Exposure parameters for residential receptors were developed to determine annual inhalation factors for purpose of the construction HRA (where emissions vary by construction year). These are presented in the Methodology Report. Supplemental exposure parameters for worker receptors used in this update are presented in **Table 8**.

4.3 Summary of Updated Health Risk Assessment

Maximum cancer risk and PM_{2.5} concentration by distance from construction of each building type are shown in **Tables 1** through **4** for building types 2, 4, 5 and 6, respectively. Maximum cancer risk by distance for worker receptors during project operations are shown in **Table 5**, for building type 2. Cancer risk for worker receptors are lower than risks for residential receptors, due to lower intake factors. Combined risks for project construction and operations for building type 2 are shown in **Table 6**.

The primary contributors to fugitive PM_{2.5} are demolition and bulldozing, followed by truck loading, paved road dust, and grading. Road dust from the full hauling, vendor, and worker trip lengths would contribute significantly to total PM_{2.5} emissions, however the portion that is assumed to occur on or near the site is limited.

Total PM_{2.5} concentrations when including fugitive dust are higher for all typologies, with a maximum of about a two-fold increase for the uncontrolled scenario and about a ten-fold increase for the controlled scenario. This difference between controlled and uncontrolled relative change is a function of how clean the exhaust emissions from the controlled scenario are, as Ramboll assumed Tier 4 equipment for controlled exhaust emissions.

⁶ SCAQMD. 2008. Localized Significance Threshold Methodology. Available at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf?sfvrsn=2>

TABLES

Table 1a
Maximum Health Impacts by Distance for Construction of Type 2
San Francisco Housing Element
San Francisco, California

Distance from Construction Project Boundary	Uncontrolled Maximum Cancer Risk ¹		Controlled Maximum Cancer Risk ²	
	Residential	Worker	Residential	Worker
5m/16ft	579	51	65	5.8
10m/33ft	497	44	56	4.9
20m/66ft	360	32	40	3.6
30m/98ft	269	24	30	2.7
40m/131ft	210	19	23	2.1
50m/164ft	168	15	19	1.7
60m/197ft	139	12	15	1.4
70m/230ft	117	10	13	1.2
80m/262ft	100	8.8	11	1.0
90m/295ft	86	7.6	10	0.86
100m/328ft	76	6.7	8.5	0.75
110m/361ft	67	5.9	7.5	0.67
120m/394ft	60	5.3	6.7	0.60
130m/427ft	54	4.8	6.0	0.54
140m/459ft	49	4.3	5.5	0.49
150m/492ft	45	4.0	5.0	0.44
160m/525ft	41	3.6	4.6	0.41
170m/558ft	38	3.3	4.2	0.37
180m/591ft	35	3.1	3.9	0.35
190m/623ft	32	2.9	3.6	0.32
200m/656ft	30	2.7	3.4	0.30
210m/689ft	28	2.5	3.1	0.28
220m/722ft	26	2.3	2.9	0.26
230m/755ft	25	2.2	2.7	0.24
240m/787ft	23	2.0	2.6	0.23
250m/820ft	22	1.9	2.4	0.22

Table 1a
Maximum Health Impacts by Distance for Construction of Type 2
San Francisco Housing Element
San Francisco, California

Distance from Construction Project Boundary	Uncontrolled Maximum Cancer Risk ¹		Controlled Maximum Cancer Risk ²	
	Residential	Worker	Residential	Worker
260m/853ft	21	1.8	2.3	0.20
270m/886ft	19	1.7	2.2	0.19
280m/919ft	18	1.6	2.1	0.18
290m/951ft	18	1.6	2.0	0.17
300m/984ft	17	1.5	1.9	0.17
310m/1017ft	16	1.4	1.8	0.16
320m/1050ft	15	1.3	1.7	0.15
330m/1083ft	15	1.3	1.6	0.14
340m/1115ft	14	1.2	1.6	0.14
350m/1148ft	13	1.2	1.5	0.13
360m/1181ft	13	1.1	1.4	0.13
370m/1214ft	12	1.1	1.4	0.12
380m/1247ft	12	1.0	1.3	0.12
390m/1280ft	11	1.0	1.3	0.11
400m/1312ft	11	1.0	1.2	0.11
410m/1345ft	10	0.93	1.2	0.10
420m/1378ft	10	0.90	1.1	0.10
430m/1411ft	10	0.86	1.1	0.10
440m/1444ft	9.4	0.84	1.1	0.094
450m/1476ft	9.1	0.81	1.0	0.091
460m/1509ft	8.8	0.78	1.0	0.088
470m/1542ft	8.5	0.76	1.0	0.085
480m/1575ft	8.3	0.73	0.9	0.082
490m/1608ft	8.0	0.71	0.90	0.080
500m/1640ft	7.8	0.69	0.87	0.077

Notes:

- ¹ Lifetime excess cancer risk and PM_{2.5} concentrations are shown for the maximally exposed receptor at each distance from the construction boundary.
- ² The Controlled modeling scenario assumed Tier 4 equipment for all construction phases, as well as street sweeping of local streets and watering of the construction site 3x daily following the Dust Control Requirements in the city of San Francisco's Health Code.

Abbreviations:

HRA - health risk assessment ft - feet
m - meter
PM_{2.5} - particulate matter less than 2.5 microns

Table 1b
Maximum PM_{2.5} Concentrations for Construction of Type 2
San Francisco Housing Element
San Francisco, California

Distance from Construction Project Boundary	Uncontrolled Maximum PM _{2.5} Concentration (ug/m ³) ¹		Controlled Maximum PM _{2.5} Concentration (ug/m ³) ²	
	Exhaust	Exhaust + Fugitive	Exhaust	Exhaust + Fugitive
5m/16ft	1.77	1.79	0.22	0.31
10m/33ft	1.52	1.53	0.19	0.25
20m/66ft	1.10	1.11	0.14	0.17
30m/98ft	0.82	0.83	0.10	0.13
40m/131ft	0.64	0.65	0.080	0.10
50m/164ft	0.51	0.52	0.064	0.078
60m/197ft	0.42	0.43	0.053	0.064
70m/230ft	0.36	0.36	0.044	0.054
80m/262ft	0.30	0.31	0.038	0.046
90m/295ft	0.26	0.27	0.033	0.040
100m/328ft	0.23	0.23	0.029	0.035
110m/361ft	0.20	0.21	0.026	0.031
120m/394ft	0.18	0.19	0.023	0.028
130m/427ft	0.16	0.17	0.021	0.025
140m/459ft	0.15	0.15	0.019	0.022
150m/492ft	0.14	0.14	0.017	0.020
160m/525ft	0.12	0.13	0.016	0.019
170m/558ft	0.11	0.12	0.014	0.017
180m/591ft	0.11	0.11	0.013	0.016
190m/623ft	0.10	0.10	0.012	0.015
200m/656ft	0.091	0.092	0.011	0.014
210m/689ft	0.085	0.086	0.011	0.013
220m/722ft	0.080	0.081	0.010	0.012
230m/755ft	0.075	0.076	0.0093	0.011
240m/787ft	0.071	0.071	0.0088	0.010
250m/820ft	0.067	0.067	0.0083	0.010

Table 1b
Maximum PM_{2.5} Concentrations for Construction of Type 2
San Francisco Housing Element
San Francisco, California

Distance from Construction Project Boundary	Uncontrolled Maximum PM _{2.5} Concentration (ug/m ³) ¹		Controlled Maximum PM _{2.5} Concentration (ug/m ³) ²	
	Exhaust	Exhaust + Fugitive	Exhaust	Exhaust + Fugitive
260m/853ft	0.063	0.063	0.0078	0.0093
270m/886ft	0.060	0.060	0.0074	0.0088
280m/919ft	0.056	0.057	0.0070	0.0084
290m/951ft	0.054	0.054	0.0067	0.0079
300m/984ft	0.051	0.052	0.0064	0.0076
310m/1017ft	0.049	0.049	0.0061	0.0072
320m/1050ft	0.046	0.047	0.0058	0.0069
330m/1083ft	0.044	0.045	0.0055	0.0066
340m/1115ft	0.042	0.043	0.0053	0.0063
350m/1148ft	0.041	0.041	0.0051	0.0060
360m/1181ft	0.039	0.039	0.0049	0.0057
370m/1214ft	0.037	0.038	0.0047	0.0055
380m/1247ft	0.036	0.036	0.0045	0.0053
390m/1280ft	0.035	0.035	0.0043	0.0051
400m/1312ft	0.033	0.034	0.0041	0.0049
410m/1345ft	0.032	0.032	0.0040	0.0047
420m/1378ft	0.031	0.031	0.0038	0.0045
430m/1411ft	0.030	0.030	0.0037	0.0044
440m/1444ft	0.029	0.029	0.0036	0.0042
450m/1476ft	0.028	0.028	0.0035	0.0041
460m/1509ft	0.027	0.027	0.0034	0.0040
470m/1542ft	0.026	0.026	0.0032	0.0038
480m/1575ft	0.025	0.025	0.0031	0.0037
490m/1608ft	0.024	0.025	0.0030	0.0036
500m/1640ft	0.024	0.024	0.0030	0.0035

Notes:

- ¹. Lifetime excess cancer risk and PM_{2.5} concentrations are shown for the maximally exposed receptor at each distance from the construction boundary.
- ². The Controlled modeling scenario assumed Tier 4 equipment for all construction phases, as well as street sweeping of local streets and watering of the construction site 3x daily following the Dust Control Requirements in the city of San Francisco's Health Code.

Abbreviations:

HRA - health risk assessment ft - feet
m - meter
PM_{2.5} - particulate matter less than 2.5 microns

Table 2a
Maximum Health Impacts by Distance for Construction of Type 4
San Francisco Housing Element
San Francisco, California

Distance from Construction Project Boundary	Uncontrolled Maximum Cancer Risk ¹		Controlled Maximum Cancer Risk ²	
	Residential	Worker	Residential	Worker
5m/16ft	98	6.2	5.9	0.37
10m/33ft	82	5.2	4.9	0.31
20m/66ft	56	3.6	3.4	0.21
30m/98ft	40	2.5	2.4	0.15
40m/131ft	30	1.9	1.8	0.11
50m/164ft	24	1.5	1.4	0.090
60m/197ft	19	1.2	1.1	0.072
70m/230ft	16	1.0	0.94	0.060
80m/262ft	13	0.84	0.80	0.050
90m/295ft	11	0.72	0.68	0.043
100m/328ft	10	0.63	0.59	0.037
110m/361ft	8.7	0.55	0.52	0.033
120m/394ft	7.7	0.49	0.46	0.029
130m/427ft	6.9	0.44	0.41	0.026
140m/459ft	6.2	0.39	0.37	0.024
150m/492ft	5.6	0.36	0.34	0.021
160m/525ft	5.1	0.33	0.31	0.019
170m/558ft	4.7	0.30	0.28	0.018
180m/591ft	4.3	0.27	0.26	0.016
190m/623ft	4.0	0.25	0.24	0.015
200m/656ft	3.7	0.24	0.22	0.014
210m/689ft	3.5	0.22	0.21	0.013
220m/722ft	3.2	0.20	0.19	0.012
230m/755ft	3.0	0.19	0.18	0.011
240m/787ft	2.8	0.18	0.17	0.011
250m/820ft	2.7	0.17	0.16	0.010

Table 2a
Maximum Health Impacts by Distance for Construction of Type 4
San Francisco Housing Element
San Francisco, California

Distance from Construction Project Boundary	Uncontrolled Maximum Cancer Risk ¹		Controlled Maximum Cancer Risk ²	
	Residential	Worker	Residential	Worker
260m/853ft	2.5	0.16	0.15	0.010
270m/886ft	2.4	0.15	0.14	0.0090
280m/919ft	2.3	0.14	0.13	0.0085
290m/951ft	2.1	0.14	0.13	0.0081
300m/984ft	2.0	0.13	0.12	0.0077
310m/1017ft	1.9	0.12	0.12	0.0073
320m/1050ft	1.8	0.12	0.11	0.0070
330m/1083ft	1.8	0.11	0.10	0.0066
340m/1115ft	1.8	0.11	0.10	0.0063
350m/1148ft	1.8	0.10	0.10	0.0061
360m/1181ft	1.8	0.10	0.092	0.0058
370m/1214ft	1.8	0.093	0.088	0.0056
380m/1247ft	1.8	0.090	0.085	0.0054
390m/1280ft	1.8	0.086	0.081	0.0051
400m/1312ft	1.8	0.083	0.078	0.0049
410m/1345ft	1.8	0.080	0.075	0.0048
420m/1378ft	1.8	0.077	0.073	0.0046
430m/1411ft	1.8	0.074	0.070	0.0044
440m/1444ft	1.8	0.072	0.068	0.0043
450m/1476ft	1.8	0.069	0.065	0.0041
460m/1509ft	1.8	0.067	0.063	0.0040
470m/1542ft	1.8	0.065	0.061	0.0039
480m/1575ft	1.8	0.063	0.059	0.0037
490m/1608ft	1.8	0.061	0.057	0.0036
500m/1640ft	1.8	0.059	0.055	0.0035

Notes:

- ¹. Lifetime excess cancer risk and PM_{2.5} concentrations are shown for the maximally exposed receptor at each distance from the construction boundary.
- ². The Controlled modeling scenario assumed Tier 4 equipment for all construction phases, as well as street sweeping of local streets and watering of the construction site 3x daily following the Dust Control Requirements in the city of San Francisco's Health Code.

Abbreviations:

HRA - health risk assessment ft - feet
m - meter
PM_{2.5} - particulate matter less than 2.5 microns

Table 2b
Maximum PM_{2.5} Concentrations for Construction of Type 4
San Francisco Housing Element
San Francisco, California

Distance from Construction Project Boundary	Uncontrolled Maximum PM _{2.5} Concentration (ug/m ³) ¹		Controlled Maximum PM _{2.5} Concentration (ug/m ³) ²	
	Exhaust	Exhaust + Fugitive	Exhaust	Exhaust + Fugitive
5m/16ft	0.55	1.1	0.036	0.26
10m/33ft	0.46	0.87	0.030	0.19
20m/66ft	0.32	0.56	0.021	0.12
30m/98ft	0.23	0.39	0.015	0.078
40m/131ft	0.17	0.29	0.011	0.057
50m/164ft	0.13	0.22	0.0088	0.044
60m/197ft	0.11	0.18	0.0071	0.035
70m/230ft	0.089	0.15	0.0059	0.029
80m/262ft	0.075	0.12	0.0049	0.024
90m/295ft	0.064	0.106	0.0042	0.021
100m/328ft	0.056	0.092	0.0037	0.018
110m/361ft	0.049	0.081	0.0032	0.016
120m/394ft	0.044	0.071	0.0029	0.014
130m/427ft	0.039	0.064	0.0026	0.012
140m/459ft	0.035	0.057	0.0023	0.011
150m/492ft	0.032	0.052	0.0021	0.010
160m/525ft	0.029	0.047	0.0019	0.0091
170m/558ft	0.027	0.043	0.0017	0.0083
180m/591ft	0.024	0.040	0.0016	0.0076
190m/623ft	0.023	0.037	0.0015	0.0070
200m/656ft	0.021	0.034	0.0014	0.0065
210m/689ft	0.019	0.032	0.0013	0.0060
220m/722ft	0.018	0.029	0.0012	0.0056
230m/755ft	0.017	0.028	0.0011	0.0053
240m/787ft	0.016	0.026	0.0011	0.0049
250m/820ft	0.015	0.024	0.0010	0.0046

Table 2b
Maximum PM_{2.5} Concentrations for Construction of Type 4
San Francisco Housing Element
San Francisco, California

Distance from Construction Project Boundary	Uncontrolled Maximum PM _{2.5} Concentration (ug/m ³) ¹		Controlled Maximum PM _{2.5} Concentration (ug/m ³) ²	
	Exhaust	Exhaust + Fugitive	Exhaust	Exhaust + Fugitive
260m/853ft	0.014	0.023	9.3E-04	0.0044
270m/886ft	0.013	0.022	8.8E-04	0.0041
280m/919ft	0.013	0.020	8.3E-04	0.0039
290m/951ft	0.012	0.019	7.9E-04	0.0037
300m/984ft	0.011	0.018	7.5E-04	0.0035
310m/1017ft	0.011	0.017	7.2E-04	0.0033
320m/1050ft	0.010	0.017	6.8E-04	0.0032
330m/1083ft	0.010	0.016	6.5E-04	0.0030
340m/1115ft	0.0095	0.015	6.2E-04	0.0029
350m/1148ft	0.0090	0.015	5.9E-04	0.0027
360m/1181ft	0.0087	0.014	5.7E-04	0.0026
370m/1214ft	0.0083	0.013	5.5E-04	0.0025
380m/1247ft	0.0080	0.013	5.2E-04	0.0024
390m/1280ft	0.0077	0.0123	5.0E-04	0.0023
400m/1312ft	0.0074	0.0118	4.8E-04	0.0022
410m/1345ft	0.0071	0.0113	4.7E-04	0.0021
420m/1378ft	0.0068	0.0109	4.5E-04	0.0021
430m/1411ft	0.0066	0.0105	4.3E-04	0.0020
440m/1444ft	0.0064	0.0102	4.2E-04	0.0019
450m/1476ft	0.0061	0.0098	4.0E-04	0.0018
460m/1509ft	0.0059	0.0095	3.9E-04	0.0018
470m/1542ft	0.0057	0.0092	3.8E-04	0.0017
480m/1575ft	0.0056	0.0089	3.7E-04	0.0017
490m/1608ft	0.0054	0.0086	3.5E-04	0.0016
500m/1640ft	0.0052	0.0083	3.4E-04	0.0016

Notes:

1. Lifetime excess cancer risk and PM_{2.5} concentrations are shown for the maximally exposed receptor at each distance from the construction boundary.
2. The Controlled modeling scenario assumed Tier 4 equipment for all construction phases, as well as street sweeping of local streets and watering of the construction site 3x daily following the Dust Control Requirements in the city of San Francisco's Health Code.

Abbreviations:

HRA - health risk assessment ft - feet

m - meter

PM_{2.5} - particulate matter less than 2.5 microns

Table 3a
Maximum Health Impacts by Distance for Construction of Type 5
San Francisco Housing Element
San Francisco, California

Distance from Construction Project Boundary	Uncontrolled Maximum Cancer Risk ¹		Controlled Maximum Cancer Risk ²	
	Residential	Worker	Residential	Worker
5m/16ft	75	4.8	6.1	0.38
10m/33ft	64	4.1	5.2	0.33
20m/66ft	46	2.9	3.7	0.23
30m/98ft	34	2.1	2.7	0.17
40m/131ft	26	1.6	2.1	0.13
50m/164ft	20	1.3	1.7	0.10
60m/197ft	17	1.1	1.4	0.09
70m/230ft	14	0.88	1.1	0.071
80m/262ft	12	0.75	1.0	0.061
90m/295ft	10	0.65	0.83	0.052
100m/328ft	8.9	0.57	0.72	0.046
110m/361ft	7.9	0.50	0.64	0.040
120m/394ft	7.0	0.45	0.57	0.036
130m/427ft	6.3	0.40	0.51	0.032
140m/459ft	5.7	0.36	0.46	0.029
150m/492ft	5.2	0.33	0.42	0.027
160m/525ft	4.7	0.30	0.38	0.024
170m/558ft	4.4	0.28	0.35	0.022
180m/591ft	4.0	0.25	0.33	0.021
190m/623ft	3.7	0.24	0.30	0.019
200m/656ft	3.5	0.22	0.28	0.018
210m/689ft	3.2	0.20	0.26	0.017
220m/722ft	3.0	0.19	0.24	0.015
230m/755ft	2.8	0.18	0.23	0.014
240m/787ft	2.7	0.17	0.22	0.014
250m/820ft	2.5	0.16	0.20	0.013

Table 3a
Maximum Health Impacts by Distance for Construction of Type 5
San Francisco Housing Element
San Francisco, California

Distance from Construction Project Boundary	Uncontrolled Maximum Cancer Risk ¹		Controlled Maximum Cancer Risk ²	
	Residential	Worker	Residential	Worker
260m/853ft	2.4	0.15	0.19	0.012
270m/886ft	2.2	0.14	0.18	0.011
280m/919ft	2.1	0.13	0.17	0.011
290m/951ft	2.0	0.13	0.16	0.010
300m/984ft	1.9	0.12	0.15	0.010
310m/1017ft	1.8	0.12	0.15	0.009
320m/1050ft	1.7	0.11	0.14	0.0089
330m/1083ft	1.7	0.11	0.13	0.0085
340m/1115ft	1.6	0.10	0.13	0.0081
350m/1148ft	1.5	0.10	0.12	0.0078
360m/1181ft	1.5	0.092	0.12	0.0075
370m/1214ft	1.4	0.088	0.11	0.0072
380m/1247ft	1.3	0.085	0.11	0.0069
390m/1280ft	1.3	0.082	0.10	0.0066
400m/1312ft	1.2	0.079	0.10	0.0064
410m/1345ft	1.2	0.076	0.10	0.0061
420m/1378ft	1.2	0.073	0.093	0.0059
430m/1411ft	1.1	0.070	0.090	0.0057
440m/1444ft	1.1	0.068	0.087	0.0055
450m/1476ft	1.0	0.066	0.084	0.0053
460m/1509ft	1.0	0.064	0.081	0.0051
470m/1542ft	1.0	0.061	0.079	0.0050
480m/1575ft	0.94	0.060	0.076	0.0048
490m/1608ft	0.91	0.058	0.074	0.0047
500m/1640ft	0.88	0.056	0.071	0.0045

Notes:

- ¹ Lifetime excess cancer risk and PM_{2.5} concentrations are shown for the maximally exposed receptor at each distance from the construction boundary.
- ² The Controlled modeling scenario assumed Tier 4 equipment for all construction phases, as well as street sweeping of local streets and watering of the construction site 3x daily following the Dust Control Requirements in the city of San Francisco's Health Code.

Abbreviations:

HRA - health risk assessment ft - feet
m - meter
PM_{2.5} - particulate matter less than 2.5 microns

Table 3b
Maximum PM_{2.5} Concentrations for Construction of Type 5
San Francisco Housing Element
San Francisco, California

Distance from Construction Project Boundary	Uncontrolled Maximum PM _{2.5} Concentration (ug/m ³) ¹		Controlled Maximum PM _{2.5} Concentration (ug/m ³) ²	
	Exhaust	Exhaust + Fugitive	Exhaust	Exhaust + Fugitive
5m/16ft	0.38	1.1	0.033	0.34
10m/33ft	0.32	0.89	0.028	0.25
20m/66ft	0.23	0.58	0.020	0.16
30m/98ft	0.17	0.41	0.015	0.11
40m/131ft	0.13	0.31	0.011	0.084
50m/164ft	0.10	0.25	0.0090	0.066
60m/197ft	0.084	0.20	0.0073	0.053
70m/230ft	0.070	0.17	0.0061	0.044
80m/262ft	0.059	0.14	0.0052	0.037
90m/295ft	0.051	0.12	0.0045	0.032
100m/328ft	0.045	0.11	0.0039	0.028
110m/361ft	0.040	0.093	0.0035	0.025
120m/394ft	0.035	0.083	0.0031	0.022
130m/427ft	0.032	0.074	0.0028	0.020
140m/459ft	0.029	0.067	0.0025	0.018
150m/492ft	0.026	0.061	0.0023	0.016
160m/525ft	0.024	0.056	0.0021	0.015
170m/558ft	0.022	0.051	0.0019	0.013
180m/591ft	0.020	0.047	0.0018	0.012
190m/623ft	0.019	0.043	0.0016	0.011
200m/656ft	0.017	0.040	0.0015	0.011
210m/689ft	0.016	0.037	0.0014	0.010
220m/722ft	0.015	0.035	0.0013	0.0092
230m/755ft	0.014	0.033	0.0012	0.0086
240m/787ft	0.013	0.031	0.0012	0.0080
250m/820ft	0.013	0.029	0.0011	0.0076

Table 3b
Maximum PM_{2.5} Concentrations for Construction of Type 5
San Francisco Housing Element
San Francisco, California

Distance from Construction Project Boundary	Uncontrolled Maximum PM _{2.5} Concentration (ug/m ³) ¹		Controlled Maximum PM _{2.5} Concentration (ug/m ³) ²	
	Exhaust	Exhaust + Fugitive	Exhaust	Exhaust + Fugitive
260m/853ft	0.012	0.027	0.0010	0.0071
270m/886ft	0.011	0.026	0.0010	0.0067
280m/919ft	0.011	0.024	9.3E-04	0.0064
290m/951ft	0.010	0.023	8.8E-04	0.0060
300m/984ft	0.010	0.022	8.4E-04	0.0057
310m/1017ft	0.0091	0.021	8.0E-04	0.0054
320m/1050ft	0.0087	0.020	7.6E-04	0.0052
330m/1083ft	0.0083	0.019	7.3E-04	0.0049
340m/1115ft	0.0079	0.018	7.0E-04	0.0047
350m/1148ft	0.0076	0.017	6.7E-04	0.0045
360m/1181ft	0.0073	0.017	6.4E-04	0.0043
370m/1214ft	0.0070	0.016	6.1E-04	0.0041
380m/1247ft	0.0067	0.015	5.9E-04	0.0040
390m/1280ft	0.0065	0.015	5.7E-04	0.0038
400m/1312ft	0.0062	0.014	5.5E-04	0.0037
410m/1345ft	0.0060	0.014	5.3E-04	0.0035
420m/1378ft	0.0058	0.013	5.1E-04	0.0034
430m/1411ft	0.0056	0.013	4.9E-04	0.0033
440m/1444ft	0.0054	0.012	4.7E-04	0.0032
450m/1476ft	0.0052	0.012	4.6E-04	0.0031
460m/1509ft	0.0050	0.011	4.4E-04	0.0029
470m/1542ft	0.0049	0.011	4.3E-04	0.0028
480m/1575ft	0.0047	0.011	4.1E-04	0.0028
490m/1608ft	0.0046	0.010	4.0E-04	0.0027
500m/1640ft	0.0044	0.010	3.9E-04	0.0026

Notes:

- ¹. Lifetime excess cancer risk and PM_{2.5} concentrations are shown for the maximally exposed receptor at each distance from the construction boundary.
- ². The Controlled modeling scenario assumed Tier 4 equipment for all construction phases, as well as street sweeping of local streets and watering of the construction site 3x daily following the Dust Control Requirements in the city of San Francisco's Health Code.

Abbreviations:

HRA - health risk assessment ft - feet
m - meter
PM_{2.5} - particulate matter less than 2.5 microns

Table 4a
Maximum Health Impacts by Distance for Construction of Type 6
San Francisco Housing Element
San Francisco, California

Distance from Construction Project Boundary	Uncontrolled Maximum Cancer Risk ¹		Controlled Maximum Cancer Risk ²	
	Residential	Worker	Residential	Worker
5m/16ft	136	8.6	13.2	0.83
10m/33ft	109	6.9	10.6	0.67
20m/66ft	70	4.5	6.8	0.43
30m/98ft	48	3.0	4.6	0.29
40m/131ft	35	2.2	3.3	0.21
50m/164ft	26	1.7	2.5	0.16
60m/197ft	21	1.3	2.0	0.13
70m/230ft	17	1.1	1.6	0.10
80m/262ft	14	0.88	1.3	0.085
90m/295ft	12	0.75	1.14	0.072
100m/328ft	10.2	0.64	0.98	0.062
110m/361ft	8.8	0.56	0.85	0.054
120m/394ft	7.8	0.49	0.75	0.048
130m/427ft	6.9	0.44	0.67	0.042
140m/459ft	6.2	0.39	0.60	0.038
150m/492ft	5.6	0.35	0.54	0.034
160m/525ft	5.1	0.32	0.49	0.031
170m/558ft	4.6	0.29	0.45	0.028
180m/591ft	4.2	0.27	0.41	0.026
190m/623ft	3.9	0.25	0.38	0.024
200m/656ft	3.6	0.23	0.35	0.022
210m/689ft	3.4	0.21	0.32	0.021
220m/722ft	3.1	0.20	0.30	0.019
230m/755ft	2.9	0.18	0.28	0.018
240m/787ft	2.7	0.17	0.26	0.017
250m/820ft	2.6	0.16	0.25	0.016

Table 4a
Maximum Health Impacts by Distance for Construction of Type 6
San Francisco Housing Element
San Francisco, California

Distance from Construction Project Boundary	Uncontrolled Maximum Cancer Risk ¹		Controlled Maximum Cancer Risk ²	
	Residential	Worker	Residential	Worker
260m/853ft	2.4	0.15	0.23	0.015
270m/886ft	2.3	0.14	0.22	0.014
280m/919ft	2.2	0.14	0.21	0.013
290m/951ft	2.0	0.13	0.20	0.012
300m/984ft	1.9	0.12	0.19	0.012
310m/1017ft	1.8	0.12	0.18	0.011
320m/1050ft	1.8	0.11	0.17	0.011
330m/1083ft	1.7	0.11	0.16	0.010
340m/1115ft	1.6	0.10	0.15	0.010
350m/1148ft	1.5	0.10	0.15	0.009
360m/1181ft	1.5	0.092	0.14	0.0089
370m/1214ft	1.4	0.088	0.13	0.0085
380m/1247ft	1.3	0.085	0.13	0.0082
390m/1280ft	1.3	0.081	0.12	0.0079
400m/1312ft	1.2	0.078	0.12	0.0076
410m/1345ft	1.2	0.075	0.11	0.0073
420m/1378ft	1.1	0.073	0.111	0.0070
430m/1411ft	1.1	0.070	0.107	0.0067
440m/1444ft	1.1	0.067	0.103	0.0065
450m/1476ft	1.0	0.065	0.099	0.0063
460m/1509ft	1.0	0.063	0.096	0.0061
470m/1542ft	1.0	0.061	0.093	0.0059
480m/1575ft	0.93	0.059	0.090	0.0057
490m/1608ft	0.90	0.057	0.087	0.0055
500m/1640ft	0.87	0.055	0.084	0.0053

Notes:

- ¹ Lifetime excess cancer risk and PM_{2.5} concentrations are shown for the maximally exposed receptor at each distance from the construction boundary.
- ² The Controlled modeling scenario assumed Tier 4 equipment for all construction phases, as well as street sweeping of local streets and watering of the construction site 3x daily following the Dust Control Requirements in the city of San Francisco's Health Code.

Abbreviations:

HRA - health risk assessment ft - feet
m - meter
PM_{2.5} - particulate matter less than 2.5 microns

Table 4b
Maximum PM_{2.5} Concentrations for Construction of Type 6
San Francisco Housing Element
San Francisco, California

Distance from Construction Project Boundary	Uncontrolled Maximum PM _{2.5} Concentration (ug/m ³) ¹		Controlled Maximum PM _{2.5} Concentration (ug/m ³) ²	
	Exhaust	Exhaust + Fugitive	Exhaust	Exhaust + Fugitive
5m/16ft	0.72	0.77	0.075	0.095
10m/33ft	0.58	0.61	0.061	0.073
20m/66ft	0.37	0.39	0.039	0.046
30m/98ft	0.25	0.26	0.026	0.031
40m/131ft	0.18	0.19	0.019	0.022
50m/164ft	0.14	0.14	0.015	0.017
60m/197ft	0.11	0.11	0.011	0.013
70m/230ft	0.089	0.09	0.0093	0.011
80m/262ft	0.074	0.076	0.0077	0.0089
90m/295ft	0.062	0.064	0.0065	0.0075
100m/328ft	0.054	0.055	0.0056	0.0064
110m/361ft	0.047	0.048	0.0049	0.0056
120m/394ft	0.041	0.042	0.0043	0.0049
130m/427ft	0.037	0.038	0.0038	0.0044
140m/459ft	0.033	0.034	0.0034	0.0039
150m/492ft	0.029	0.030	0.0031	0.0035
160m/525ft	0.027	0.028	0.0028	0.0032
170m/558ft	0.024	0.025	0.0026	0.0029
180m/591ft	0.022	0.023	0.0024	0.0027
190m/623ft	0.021	0.021	0.0022	0.0025
200m/656ft	0.019	0.020	0.0020	0.0023
210m/689ft	0.018	0.018	0.0019	0.0021
220m/722ft	0.016	0.017	0.0017	0.0020
230m/755ft	0.015	0.016	0.0016	0.0018
240m/787ft	0.014	0.015	0.0015	0.0017
250m/820ft	0.014	0.014	0.0014	0.0016

Table 4b
Maximum PM_{2.5} Concentrations for Construction of Type 6
San Francisco Housing Element
San Francisco, California

Distance from Construction Project Boundary	Uncontrolled Maximum PM _{2.5} Concentration (ug/m ³) ¹		Controlled Maximum PM _{2.5} Concentration (ug/m ³) ²	
	Exhaust	Exhaust + Fugitive	Exhaust	Exhaust + Fugitive
260m/853ft	0.013	0.013	0.0013	0.0015
270m/886ft	0.012	0.012	0.0013	0.0014
280m/919ft	0.011	0.012	0.0012	0.0014
290m/951ft	0.011	0.011	0.0011	0.0013
300m/984ft	0.010	0.011	0.0011	0.0012
310m/1017ft	0.010	0.010	0.0010	0.0012
320m/1050ft	0.0092	0.010	0.0010	0.0011
330m/1083ft	0.0088	0.009	9.3E-04	0.0011
340m/1115ft	0.0084	0.0087	8.8E-04	0.0010
350m/1148ft	0.0080	0.0083	8.4E-04	9.6E-04
360m/1181ft	0.0077	0.0079	8.1E-04	9.2E-04
370m/1214ft	0.0074	0.0076	7.7E-04	8.8E-04
380m/1247ft	0.0071	0.0073	7.4E-04	8.4E-04
390m/1280ft	0.0068	0.0070	7.1E-04	8.1E-04
400m/1312ft	0.0065	0.0067	6.9E-04	7.8E-04
410m/1345ft	0.0063	0.0065	6.6E-04	7.5E-04
420m/1378ft	0.0060	0.0062	6.3E-04	7.2E-04
430m/1411ft	0.0058	0.0060	6.1E-04	6.9E-04
440m/1444ft	0.0056	0.0058	5.9E-04	6.7E-04
450m/1476ft	0.0054	0.0056	5.7E-04	6.5E-04
460m/1509ft	0.0052	0.0054	5.5E-04	6.2E-04
470m/1542ft	0.0051	0.0052	5.3E-04	6.0E-04
480m/1575ft	0.0049	0.0051	5.1E-04	5.8E-04
490m/1608ft	0.0047	0.0049	5.0E-04	5.6E-04
500m/1640ft	0.0046	0.0047	4.8E-04	5.5E-04

Notes:

- ¹ Lifetime excess cancer risk and PM_{2.5} concentrations are shown for the maximally exposed receptor at each distance from the construction boundary.
- ² The Controlled modeling scenario assumed Tier 4 equipment for all construction phases, as well as street sweeping of local streets and watering of the construction site 3x daily following the Dust Control Requirements in the city of San Francisco's Health Code.

Abbreviations:

HRA - health risk assessment ft - feet
m - meter
PM_{2.5} - particulate matter less than 2.5 microns

Table 5
Maximum Health Impacts by Distance for Emergency
Generator Operation of Type 2
San Francisco Housing Element
San Francisco, California

Distance from Construction Project Boundary	Maximum Cancer Risk ¹	
	Residential	Worker
5m/16ft	0.047	0.0039
10m/33ft	0.24	0.020
20m/66ft	0.95	0.079
30m/98ft	1.2	0.10
40m/131ft	1.3	0.11
50m/164ft	1.2	0.10
60m/197ft	1.1	0.094
70m/230ft	1.0	0.085
80m/262ft	0.93	0.077
90m/295ft	0.84	0.070
100m/328ft	0.76	0.063
110m/361ft	0.69	0.058
120m/394ft	0.63	0.053
130m/427ft	0.58	0.049
140m/459ft	0.54	0.045
150m/492ft	0.50	0.041
160m/525ft	0.46	0.039
170m/558ft	0.43	0.036
180m/591ft	0.41	0.034
190m/623ft	0.38	0.032
200m/656ft	0.36	0.030
210m/689ft	0.34	0.028
220m/722ft	0.32	0.027
230m/755ft	0.31	0.026
240m/787ft	0.30	0.025
250m/820ft	0.28	0.024

Table 5
Maximum Health Impacts by Distance for Emergency
Generator Operation of Type 2
San Francisco Housing Element
San Francisco, California

Distance from Construction Project Boundary	Maximum Cancer Risk ¹	
	Residential	Worker
260m/853ft	0.27	0.023
270m/886ft	0.26	0.022
280m/919ft	0.25	0.021
290m/951ft	0.24	0.020
300m/984ft	0.23	0.020
310m/1017ft	0.23	0.019
320m/1050ft	0.22	0.018
330m/1083ft	0.21	0.018
340m/1115ft	0.21	0.017
350m/1148ft	0.20	0.017
360m/1181ft	0.20	0.016
370m/1214ft	0.19	0.016
380m/1247ft	0.19	0.016
390m/1280ft	0.18	0.015
400m/1312ft	0.18	0.015
410m/1345ft	0.18	0.015
420m/1378ft	0.17	0.014
430m/1411ft	0.17	0.014
440m/1444ft	0.17	0.014
450m/1476ft	0.16	0.014
460m/1509ft	0.16	0.013
470m/1542ft	0.16	0.013
480m/1575ft	0.16	0.013
490m/1608ft	0.15	0.013
500m/1640ft	0.15	0.013

Notes:

- ¹. Lifetime excess cancer risks are shown for the maximally exposed receptor at each distance from the project boundary.

Abbreviations:

HRA - health risk assessment
m - meter

ft - feet

Table 6
Maximum Health Impacts by Distance for Construction and Emergency Generator
Operation of Type 2
San Francisco Housing Element
San Francisco, California

Distance from Construction Project Boundary	Uncontrolled Maximum Cancer Risk ¹		Controlled Maximum Cancer Risk	
	Residential	Worker	Residential	Worker
5m/16ft	579	51	65	5.8
10m/33ft	497	44	56	5.0
20m/66ft	361	32	41	3.7
30m/98ft	270	24	31	2.8
40m/131ft	211	19	25	2.2
50m/164ft	169	15	20	1.8
60m/197ft	140	12	17	1.5
70m/230ft	118	10	14	1.2
80m/262ft	100	8.9	12	1.1
90m/295ft	87	7.7	10	0.93
100m/328ft	77	6.8	9.2	0.82
110m/361ft	68	6.0	8.2	0.73
120m/394ft	61	5.4	7.4	0.65
130m/427ft	55	4.8	6.6	0.59
140m/459ft	49	4.4	6.0	0.53
150m/492ft	45	4.0	5.5	0.49
160m/525ft	41	3.7	5.0	0.45
170m/558ft	38	3.4	4.6	0.41
180m/591ft	35	3.1	4.3	0.38
190m/623ft	33	2.9	4.0	0.35
200m/656ft	30	2.7	3.7	0.33
210m/689ft	28	2.5	3.5	0.31
220m/722ft	26	2.3	3.3	0.29
230m/755ft	25	2.2	3.1	0.27
240m/787ft	23	2.1	2.9	0.25
250m/820ft	22	2.0	2.7	0.24

Table 6
Maximum Health Impacts by Distance for Construction and Emergency Generator
Operation of Type 2
San Francisco Housing Element
San Francisco, California

Distance from Construction Project Boundary	Uncontrolled Maximum Cancer Risk ¹		Controlled Maximum Cancer Risk	
	Residential	Worker	Residential	Worker
260m/853ft	21	1.8	2.6	0.23
270m/886ft	20	1.7	2.4	0.22
280m/919ft	19	1.7	2.3	0.20
290m/951ft	18	1.6	2.2	0.19
300m/984ft	17	1.5	2.1	0.19
310m/1017ft	16	1.4	2.0	0.18
320m/1050ft	15	1.4	1.9	0.17
330m/1083ft	15	1.3	1.8	0.16
340m/1115ft	14	1.2	1.8	0.16
350m/1148ft	13	1.2	1.7	0.15
360m/1181ft	13	1.1	1.6	0.14
370m/1214ft	12	1.1	1.6	0.14
380m/1247ft	12	1.1	1.5	0.13
390m/1280ft	11	1.0	1.4	0.13
400m/1312ft	11	1.0	1.4	0.12
410m/1345ft	11	0.94	1.4	0.12
420m/1378ft	10	0.91	1.3	0.12
430m/1411ft	10	0.88	1.3	0.11
440m/1444ft	10	0.85	1.2	0.11
450m/1476ft	9.3	0.82	1.2	0.10
460m/1509ft	9.0	0.79	1.1	0.10
470m/1542ft	8.7	0.77	1.1	0.10
480m/1575ft	8.4	0.75	1.1	0.10
490m/1608ft	8.2	0.72	1.0	0.09
500m/1640ft	7.9	0.70	1.0	0.090

Notes:

- ¹. Lifetime excess cancer risks are shown for the maximally exposed receptor at each distance from the project boundary.

Abbreviations:

HRA - health risk assessment

m - meter

PM_{2.5} - particulate matter less than 2.5 microns

Table 7
Modeling Parameters
San Francisco Housing Element
San Francisco, California

Construction Sources

Source	Source Type ¹	Number of Sources ²	Source Dimension	Release Height ³	Initial Vertical Dimension ⁴	Initial Lateral Dimension ⁵
			[m]	[m]	[m]	[m]
Construction Equipment	Area	6	Parcel Area	5.0	1.4	--
Fugitive Dust from Construction	Area	6	Parcel Area	0	1.0	--

Notes:

1. Construction off-road equipment is modeled as an area source covering the parcel under construction, consistent with the Citywide HRA (SF DPH, SF Planning, Ramboll, 2020).
2. The number of on-road sources is based on the geometry of the truck or traffic routes. The number of generator sources was developed using the generator types in the analysis.
3. According to the Community HRA methodology, release height of a modeled area source representing construction equipment was set to 5 meters. Following SCAQMD guidance for fugitive dust from construction area sources, release height of a modeled area source representing fugitive dust from construction equipment is 0 meters.
4. According to the Community HRA methodology, initial vertical dimension of the modeled construction equipment volume sources was set to 1.4 meters. Following SCAQMD guidance for fugitive dust from construction area sources, initial vertical dimension of the modeled construction equipment volume sources is set to 1 meter.

Abbreviations:

BAAQMD - Bay Area Air Quality Management District
 CRRP - Community Risk Reduction Plan
 HRA - Health risk assessment
 m - meter
 s - second

SCAQMD - South Coast Air Quality Management District
 USEPA - United States Environmental Protection Agency

References:

San Francisco Department of Public Health (SF DPH), San Francisco Planning Department (SF Planning), and Ramboll. 2020. San Francisco Citywide Health Risk Assessment: Technical Support Documentation.

USEPA. 2012. Haul Road Workgroup Final Report Submissoin to EPA-OAQPS. March. Available at: https://www3.epa.gov/scram001/reports/Haul_Road_Workgroup-Final_Report_Package-20120302.pdf

SCAQMD. 2008. Localized Significance Threshold Methodology. Available at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-1st-methodology-document.pdf?sfvrsn=2>

USEPA. 2021. User's Guide for the AMS/EPA Regulatory Model (AERMOD). Office of Air Quality Planning and Standards. Research Triangle Park, North Carolina. EPA-454/B-20-001, April 2021). Available at: https://gaftp.epa.gov/Air/aqmg/SCRAM/models/preferred/aermod/aermod_userguide.pdf

Table 8
Worker Exposure Parameters
San Francisco Housing Element
San Francisco, California

Receptor Type ¹	Receptor Age Group	Exposure Parameters						
		Daily Breathing Rate (DBR) ²	Annual Exposure Duration (ED)	Fraction of Time at Home (FAH)	Exposure Frequency (EF) ³	Averaging Time (AT)	Intake Factor, Inhalation (I _{f_{inh}})	Age Sensitivity Factor (ASF)
		(L/kg-day)	(years)	(unitless)	(days/year)	(days)	(m ³ /kg-day)	(unitless)
Worker	16-70 years	230	1	NA	250	25,550	0.0023	1

Year	Worker	
	Fraction of Year in Age Bin ⁴	Age Sensitivity Weighted Intake Factor by Year, Inhalation ⁵
	16-70 years	(m ³ /kg-day)
2023	1	0.0023
2024	1	0.0023
2025	1	0.0023
2026	1	0.0023
2027	1	0.0023
2028	1	0.0023
2029	1	0.0023
2030	1	0.0023
2031	1	0.0023
2032	1	0.0023
2033	1	0.0023
2034	1	0.0023
2035	1	0.0023
2036	1	0.0023
2037	1	0.0023
2038	1	0.0023
2039	1	0.0023
2040	1	0.0023
2041	1	0.0023
2042	1	0.0023
2043	1	0.0023
2044	1	0.0023
2045	1	0.0023
2046	1	0.0023
2047	1	0.0023
Total Intake Factor for 25-Year Emergency Generator Exposure⁸		0.0563

Receptor Type	Worker Adjustment Factor ^{6,7}
	Construction
Worker	4.2

Notes:

- All workers will be assumed to be exposed to risks during the duration of construction.
- Daily breathing rates for workers assume 230 L/kg-8 hours, which represents the 95th percentile 8-hour breathing rate based on moderate activity of 16-70 years-old age range, per BAAQMD 2016 and 2020 Health Risk Assessment (HRA) Modeling Guidelines.
- Exposure frequency reflects default worker's exposure frequency from OEHA 2015.
- The worker's exposure duration for all years is 1, as the health risk assessment is based on annual emissions.
- The Intake Factors have been multiplied by the Age Sensitivity Factors and weighted by the exposure duration for each age bin, using the following equation:

$$I_{Finh} = DBR * FAH * EF * ED * CF / AT$$

$$0.001 = CF, \text{ conversion factor (m}^3/L\text{)}$$
- The worker adjustment factor (WAF) was calculated to adjust the worker's inhalation concentration according to OEHA 2015 using the following equation:

$$WAF = (Hres/Hsource) * (Dres/Dsource) * DF \text{ where}$$

$$24 = Hres, \text{ hours the annual average residential air concentration is based on (hrs/day)}$$

$$8 = Hsource, \text{ daily source operational hours (hrs/day)}$$

$$7 = Dres, \text{ days the annual average residential air concentration is based on (days/wk)}$$

$$5 = Dsource, \text{ operational hours of the source (days/wk)}$$

$$1 = DF - \text{discount factor}$$
- While actual construction hours may vary, all construction was conservatively assumed to overlap with the daily 8-hr worker exposure.
- For the emergency generators, the maximally exposed worker is assumed to be exposed to risks for 25 years beginning at the start of operation, following OEHA guidance.

Abbreviations:

AT - averaging time	I _{f_{inh}} - intake factor
BAAQMD - Bay Area Air Quality Management District	kg - kilogram
CF - conversion factor	L - liter
DBR - daily breathing rate	m ³ - cubic meter
ED - exposure duration	OEHA - Office of Environmental Health Hazard Assessment
EF - exposure frequency	WAF - worker adjustment factor

References:

- BAAQMD. 2016. Air Toxics NSR Program Health Risk Assessment (HRA) Guidelines. January.
- BAAQMD. 2020. Health Risk Assessment (HRA) Modeling Protocol. December.
- OEHA. 2015. Air Toxics Hot Spots Program Risk Assessment Guidelines. Guidance Manual for Preparation of Health Risk Assessments. February.

Table 9
Emission Calculations for Entrained Roadway Dust
San Francisco Housing Element
San Francisco, California

Inputs	
On-site Trip Length ¹	
Typology 1 (miles/trip)	0.089 miles
Typology 2 (miles/trip)	0.073 miles
Typology 3 (miles/trip)	0.063 miles
Typology 4 (miles/trip)	0.049 miles
Typology 5 (miles/trip)	0.063 miles
Typology 6 (miles/trip)	0.028 miles
Entrained Road Dust Emission Factors ²	
PM10 Emission Factor [lb/VMT]	4.14E-04
PM2.5 Emission Factor [lb/VMT]	6.21E-05

Type	Year	Days	Worker Trips (trips/day)	Vendor Trips (trips/day)	Hauling Trips (total trips)	Worker VMT (miles)	Vendor VMT (miles)	Hauling VMT (miles)	Total VMT (miles)	Uncontrolled Emissions (lb)		Controlled Emissions (lb)	
										PM ₁₀	PM _{2.5}	PM ₁₀	PM _{2.5}
Type 2	2023	20	12	42	2,148	17.5	61	157	236	0.098	0.0146	0.082	0.0123
	2023	45	40	70	4,833	131	230	353	714	0.30	0.044	0.25	0.037
	2023	45	40	8.0	--	131	26	--	158	0.065	0.0098	0.055	0.0082
	2023	150	380	6.7	--	4,162	73	--	4,235	1.75	0.26	1.47	0.22
	2024	262	380	6.7	--	7,270	128	--	7,398	3.1	0.46	2.6	0.39
	2025	241	380	6.7	--	6,687	118	--	6,805	2.8	0.42	2.4	0.35
	2024	65	223	3.3	--	1058	15.7	--	1074	0.44	0.067	0.37	0.056
	2025	241	223	3.3	--	3,924	58	--	3,982	1.65	0.25	1.38	0.21
Type 4	2025	88	30	--	--	193	--	--	193	0.080	0.0120	0.067	0.0100
	2023	18	13	--	--	11.4	--	--	11.4	0.0047	7.1E-04	0.0040	6.0E-04
	2023	2	8.0	--	35	0.78	--	--	2.5	1.0E-03	1.5E-04	8.7E-04	1.3E-04
	2023	4	8.0	--	6,650	1.56	--	325	326	0.135	0.020	0.114	0.0170
	2023	177	36	5.0	--	311	43	--	355	0.147	0.022	0.123	0.0185
	2023	9	13	--	--	5.7	--	--	5.7	0.0024	3.5E-04	0.0020	3.0E-04
	2023	9	7.0	--	--	3.1	--	--	3.1	1.3E-03	1.9E-04	1.1E-03	1.6E-04
	2023	19	96	--	1,664	115	--	105	220	0.091	0.0137	0.077	0.0115
Type 5	2023	11	76	--	--	53	--	--	53	0.022	0.0033	0.0183	0.0027
	2023	28	56	--	896	99	--	57	155	0.064	0.0096	0.054	0.0081
	2023	39	76	--	--	187	--	--	187	0.077	0.0116	0.065	0.0097
	2023	163	58	9.2	--	596	95	--	691	0.29	0.043	0.24	0.036
	2024	14	58	9.2	--	51	8.1	--	59	0.025	0.0037	0.021	0.0031
	2024	35	60	--	560	132	--	35	168	0.069	0.0104	0.058	0.0087
	2023	20	--	--	269	--	--	7.6	7.6	0.0031	4.7E-04	0.0026	4.0E-04
	2023	40	--	--	501	--	--	14.1	14.1	0.0059	8.8E-04	0.0049	7.4E-04
Type 6	2023	120	--	--	--	--	--	--	--	--	--	--	--
	2023	80	--	--	--	--	--	--	--	--	--	--	--
	2024	40	--	--	--	--	--	--	--	--	--	--	--
	2023	260	30	1.7	--	220	12	--	232	0.096	0.0144	0.081	0.0121
	2024	40	30	1.7	--	34	2	--	36	0.0148	0.0022	0.0124	1.9E-03

Notes:

- Trip length estimated as two times the on-site diameter. Typology 2, 4, 5, and 6, have circular areas of 0.67, 0.3, 0.5, 0.1 acres, respectively.
- Entrained road dust emission factors were obtained from Methods Table-4 and have been adjusted using constants for San Francisco County and the California Air Resources Board's (ARB) March 2021 Miscellaneous Process Methodology 7.9 for Entrained Road Travel, Paved Road Dust.
- A 16% reduction in the PM₁₀ emission factor was taken for street sweeping of local streets, based on SCAQMD's Fugitive Dust Table XI-C.

Abbreviations:

ARB - Air Resources Board	mi: mile
CalEEMod - California Emissions Estimator Model	USEPA: United States Environmental Protection Agency
PM _{2.5} - particulate matter less than 2.5 microns	VMT: vehicle miles traveled
PM ₁₀ - particulate matter less than 10 microns	
lb - pound	

References:

California Air Resources Board. 2021. Miscellaneous Process Methodology 7.9, Entrained Road Travel, Paved Road Dust. March. Available online at: https://ww3.arb.ca.gov/ei/areasrc/fullpdf/2021_paved_roads_7_9.pdf

SCAQMD. 2007. Table XI-C Mitigation Measure Examples: Dust From Paved Roads. Available online at: <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies/fugitive-dust>

Table 10
Fugitive Dust Emissions from Building Demolition Waste
San Francisco Housing Element
San Francisco, California

Construction Area	Subphase	Year	Number of Days	Building Waste ¹		Emission Factor - Mechanical or Explosive Dismemberment ²	Emission Factor - Debris Loading ³	Uncontrolled Emissions ⁴		Controlled Emissions ⁴	
						PM _{2.5}	PM _{2.5}	PM _{2.5}		PM _{2.5}	
			days	ft ²	ton	lb/ton	lb/ton	lb/day	ton/yr	lb/day	ton/yr
Type 2	Site Preparation/Demolition	2023	20	90,000	4,140	1.7E-04	0.0031	0.67	0.0067	0.26	0.0026
Type 4	Demolition	2023	18	39,049	1,796			0.32	0.0029	0.13	0.0011
Type 5	Demolition	2023	20	88,000	4,048			0.67	0.0066	0.26	0.0026
Type 6	Demolition	2023	20	2,000	92			0.015	1.5E-04	0.0058	5.8E-05

Notes:

- Conversion of building waste to tons assumes an average soil density of 1.5 grams per cubic centimeter, per the CalEEMod® User's Guide, Appendix A Truck Loading.
- Emission factor calculated following guidance in the CalEEMod® User's Guide, Appendix A Mechanical or Explosive Dismemberment, which is based of AP 42 Section 13.2.4.3 for batch drop operations. The equation is:

$$EF = k \cdot (0.0032) \cdot (U/5)^{1.3} / (M/2)^{1.4} \text{ (lb/ton of debris)}$$

0.35 = kPM10 Particle size multiplier (dimensionless)
0.053 = kPM2.5 Particle size multiplier (dimensionless)
4.92 = U, mean wind speed (mph)
2 = M, material moisture content (%)
- Emission factor calculated following guidance in the CalEEMod® User's Guide, Appendix A Debris Loading, which is based of AP 42 Section 13.2. The equation is:

$$EF = k \cdot EF_{L-TSP}$$

0.35 = kPM10 Particle size multiplier (dimensionless)
0.053 = kPM2.5 Particle size multiplier (dimensionless)
0.058 = EF_{L-TSP}, lb/ton
- Fugitive PM_{2.5} emissions from demolition will be controlled by watering the construction site three times per day, which is estimated to reduce emissions by 61% per CalEEMod® recommendation.

Abbreviations:

CalEEMod® - California Emissions Estimator Model
cy - cubic yards
EF - emission factor
lb - pounds

PM_{2.5} - particulate matter less than 2.5 microns in aerodynamic diameter
VMT - vehicle miles traveled
yr - years

References:

California Air Pollution Control Officers Association (CAPCOA). 2020. California Emissions Estimator Model (CalEEMod), Version 2020.4.0. Available online at <http://www.caleemod.com/>

Table 11
Fugitive Dust Emissions from Off-Road Grading Activity
San Francisco Housing Element
San Francisco, California

Type	Maximum Area Disturbed ¹	Grading VMT ²	Uncontrolled PM _{2.5} Emission Factor ³	Uncontrolled Emissions ⁴		Controlled Emissions ⁴	
				PM _{2.5}		PM _{2.5}	
	acre/day	miles/day	lb/VMT	lb/day	ton/yr	lb/day	ton/yr
Type 2	--	--	0.17	--	--	--	--
Type 4	0.50	0.34		0.057	5.7E-05	0.022	2.2E-05
	0.50	0.34		0.057	1.1E-04	0.022	4.5E-05
Type 5	0.50	0.34		0.057	0.0010	0.022	3.9E-04
Type 6	--	--		--	--	--	--

Notes:

- Maximum graded area is based on Project-specific estimate following guidance in the CalEEMod® User's Guide, Appendix A. Following CalEEMod methodology, grading emissions are only calculated for Site Preparation and Grading phases.
- VMT per day calculated following guidance in the CalEEMod® User's Guide, Appendix A, which is based on AP-42, Section 11.9 for grading equipment. The equation is:

$$VMT = A_S / W_b \times (43,560 \text{ sqft/acre}) / (5,280 \text{ ft/mile}), \text{ where:}$$

$$A_S = A_S, \text{ acres graded per day (varies by sub-activity)}$$

$$12 = W_b, \text{ blade width of grading equipment (CalEEMod® default)}$$
- Emission factors calculated following guidance in the CalEEMod® User's Guide, Appendix A, which is based on AP-42, Section 11.9 for grading equipment. The equations are:

$$EF_{PM_{10}} = 0.051 \times (S)^{2.0} \times F_{PM_{10}}$$

$$EF_{PM_{2.5}} = 0.04 \times (S)^{2.5} \times F_{PM_{2.5}} \text{ where:}$$

$$7.1 = S, \text{ mean vehicle speed (mph) (AP-42 default)}$$

$$0.6 = F_{PM_{10}}, PM_{10} \text{ scaling factor (AP-42 default)}$$

$$0.031 = F_{PM_{2.5}}, PM_{2.5} \text{ scaling factor (AP-42 default)}$$
- Fugitive PM emissions will be controlled by watering the construction site three times per day, which is estimated to reduce emissions by 61% per CalEEMod® recommendation.

Abbreviations:

CalEEMod® - California Emissions Estimator Model
 EF - emission factor
 ft - feet
 lb - pounds

mph - miles per hour
 PM_{2.5} - particulate matter less than 2.5 microns in diameter
 VMT - vehicle miles traveled
 yr - years

References:

California Air Pollution Control Officers Association (CAPCOA). 2020. California Emissions Estimator Model (CalEEMod), Version 2020.4.0. Available online at <http://www.caleemod.com/>

Table 12
Fugitive Dust Emissions from Truck Loading Activity
San Francisco Housing Element
San Francisco, California

Type	Phase	Year	Material Loaded ¹	Uncontrolled Emission Factor ²		Uncontrolled Emissions ³		Controlled Emissions ³	
				PM ₁₀	PM _{2.5}	PM _{2.5}		PM _{2.5}	
			ton	lb/ton		lb/day	ton/yr	lb/day	ton/yr
Typology 2	Site Preparation/Demolition	2023	13,594	2.3E-04	3.5E-05	0.024	2.4E-04	0.0094	9.4E-05
	Excavation Shoring	2023	30,586			0.024	5.4E-04	0.0094	2.1E-04
Typology 4	Site Preparation	2023	220			0.0039	3.9E-06	0.0015	1.5E-06
	Grading	2023	5,260			0.046	9.3E-05	0.018	3.6E-05
Typology 5	Demolition	2023	21,061			0.039	3.7E-04	0.015	1.4E-04
	Excavation & Shoring	2023	11,340			0.014	2.0E-04	0.0056	7.8E-05
	Sitework	2024	7,088			0.0071	1.3E-04	0.0028	4.9E-05
Typology 6	Demolition	2023	3,405			0.0060	6.0E-05	0.0023	2.3E-05
	Excavation	2023	6,341			0.0056	1.1E-04	0.0022	4.4E-05

Notes:

- Total materials loaded were the total material moved during each phase. Where the amount of moved material was not available, the total material loaded was calculated from haul truck trips using the CalEEMod default of 16 cubic yards of material per 1-way trip.
- Emission factor calculated following guidance in the CalEEMod® User's Guide, Appendix A, which is based on AP-42, Section 13.2.4 for aggregate handling. The equation is:

$$EF = k \times (0.0032) \times (U/5)^{1.3} / (M/2)^{1.4}$$
, where the following default values are used:
0.35 = $k_{PM_{10}}$, PM₁₀ particle size multiplier
0.053 = $k_{PM_{2.5}}$, PM_{2.5} particle size multiplier
4.6 = mean wind speed (U), meters per second
10.3 = mean wind speed (U), miles per hour
12 = material moisture content (M), %
- Fugitive PM emissions will be controlled by watering the construction site three times per day, which is estimated to reduce emissions by 61% per CalEEMod® recommendation.

Abbreviations:

CalEEMod® - California Emissions Estimator Model
EF - emission factor
lbs - pounds
PM₁₀ - particulate matter less than 10 microns in aerodynamic diameter
PM_{2.5} - particulate matter less than 2.5 microns in aerodynamic diameter

References:

California Air Pollution Control Officers Association (CAPCOA). 2020. California Emissions Estimator Model (CalEEMod), Version 2020.4.0. Available online at <http://www.caleemod.com/>

Table 13
Fugitive Dust Emissions from Off-Road Bulldozing Activity
San Francisco Housing Element
San Francisco, California

Type	Construction Phase	Number of Equipment	Daily Usage (hours/day)	Total Equipment Work Hours ¹ (hours/day)	Uncontrolled PM _{2.5} Emission Factor ³ (lbs/hour)	Uncontrolled Emissions ⁴		Controlled Emissions ⁴	
						PM _{2.5}		PM _{2.5}	
						lb/day	ton/yr	lb/day	ton/yr
Type 2	--	--	--	--	0.41	--	--	--	--
Type 4	Demolition	1	1	1		0.41	0.0037	0.16	0.0015
	Grading	1	1	1		0.41	8.3E-04	0.16	3.2E-04
Type 5	Demolition	2	7	14		0.74	0.0071	0.29	0.0028
Type 6	--	--	--	--		--	--	--	--

Notes:

- ¹. The equipment use schedule is based on Project-specific estimates, and includes planned hours for all tracked dozers to be used during the given phase.
- ². Emission factor calculated following guidance in the CalEEMod[®] User's Guide, Appendix A, which is based on AP-42, Section 11.9 for bulldozing equipment. The equation is:
 $EF_{PM_{10}} = C_{PM_{15}} \times s^{1.5} / M^{1.4} \times F_{PM_{10}}$, where the following default values are used:
1.0 = $C_{PM_{15}}$, arbitrary coefficient
6.9 = s , material silt content (%)
7.9 = M , material moisture content (%)
0.75 = $F_{PM_{10}}$, PM_{10} scaling factor
- ³. Emission factor calculated following guidance in the CalEEMod[®] User's Guide, Appendix A, which is based on AP-42, Section 11.9 for bulldozing equipment. The equation is:
 $EF_{PM_{2.5}} = C_{TSP} \times s^{1.2} / M^{1.3} \times F_{PM_{2.5}}$, where the following default values are used:
5.7 = C_{TSP} , arbitrary coefficient
6.9 = s , material silt content (%)
7.9 = M , material moisture content (%)
0.105 = $F_{PM_{2.5}}$, $PM_{2.5}$ scaling factor
- ⁴. Fugitive PM emissions will be controlled by watering the construction site three times per day, which is estimated to reduce emissions by 61% per CalEEMod[®] recommendation.

Abbreviations:

CalEEMod[®] - California Emissions Estimator Model
EF - emission factor
lbs - pounds

PM_{10} - particulate matter less than 10 microns
 $PM_{2.5}$ - particulate matter less than 2.5 microns
VMT - vehicle miles traveled

References:

California Air Pollution Control Officers Association (CAPCOA). 2020. California Emissions Estimator Model (CalEEMod), Version 2020.4.0. Available online at <http://www.caleemod.com/>

APPENDIX A
MODELING FILES
(PROVIDED ELECTRONICALLY)

Introduction Form

By a Member of the Board of Supervisors or the Mayor

Time stamp
or meeting date

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

- ☐ 1. For reference to Committee. (An Ordinance, Resolution, Motion, or Charter Amendment)
- ☐ 2. Request for next printed agenda Without Reference to Committee.
- ☒ 3. Request for hearing on a subject matter at Committee.
- ☐ 4. Request for letter beginning "Supervisor inquires"
- ☐ 5. City Attorney request.
- ☐ 6. Call File No. from Committee.
- ☐ 7. Budget Analyst request (attach written motion).
- ☐ 8. Substitute Legislation File No.
- ☐ 9. Reactivate File No.
- ☐ 10. Question(s) submitted for Mayoral Appearance before the BOS on

Please check the appropriate boxes. The proposed legislation should be forwarded to the following:

- ☐ Small Business Commission ☐ Youth Commission ☐ Ethics Commission
- ☐ Planning Commission ☐ Building Inspection Commission

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

Sponsor(s):

Subject:

The text is listed below or attached:

Hearing of the Board of Supervisors sitting as a Committee of the Whole on November 15, 2022, at 3:00 p.m., during the regular Board of Supervisors meeting, to hold a public hearing on the draft Housing Element 2022 Update, including its goals, objectives, policies, and actions; and requesting the Planning Department to report; scheduled pursuant to Motion No. M22-162 (File No. 221032), approved on October 18, 2022.

Signature of Sponsoring Supervisor: _____

For Clerk's Use Only: