

**From:** [Somera, Alisa \(BOS\)](#)  
**To:** [BOS Legislation. \(BOS\)](#)  
**Subject:** FW: Re housing element public comment  
**Date:** Tuesday, November 15, 2022 7:48:18 PM

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*Alisa Somera*

Legislative Deputy Director  
San Francisco Board of Supervisors  
1 Dr. Carlton B. Goodlett Place, Room 244  
San Francisco, CA 94102  
415.554.7711 direct | 415.554.5163 fax  
[alisa.somera@sfgov.org](mailto:alisa.somera@sfgov.org)

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**From:** Board of Supervisors (BOS) <[board.of.supervisors@sfgov.org](mailto:board.of.supervisors@sfgov.org)>  
**Sent:** Tuesday, November 15, 2022 7:25 PM  
**To:** BOS-Supervisors <[bos-supervisors@sfgov.org](mailto:bos-supervisors@sfgov.org)>; BOS-Legislative Aides <[bos-legislative\\_aides@sfgov.org](mailto:bos-legislative_aides@sfgov.org)>  
**Cc:** Calvillo, Angela (BOS) <[angela.calvillo@sfgov.org](mailto:angela.calvillo@sfgov.org)>; Somera, Alisa (BOS) <[alisa.somera@sfgov.org](mailto:alisa.somera@sfgov.org)>; Ng, Wilson (BOS) <[wilson.l.ng@sfgov.org](mailto:wilson.l.ng@sfgov.org)>; De Asis, Edward (BOS) <[edward.deasis@sfgov.org](mailto:edward.deasis@sfgov.org)>; Entezari, Mehran (BOS) <[Mehran.Entezari@sfgov.org](mailto:Mehran.Entezari@sfgov.org)>  
**Subject:** FW: Re housing element public comment

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**From:** Maria Zamudio <[maria@hrcsf.org](mailto:maria@hrcsf.org)>  
**Sent:** Tuesday, November 15, 2022 7:06 PM

**To:** Calvillo, Angela (BOS) <[angela.calvillo@sfgov.org](mailto:angela.calvillo@sfgov.org)>

**Subject:** Re housing element public comment

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

My name is Laura Gomez, and I have been resident at Plaza East Apartments in the Fillmore since 2011. The redevelopment proposed by our corporate landlord, McCormack Baron Salazar, will tear down 193 affordable units and turn them into a high-rise apartment complex with 270 market rate units, which will not only take away affordable units from those who need them, but also price out the remaining low-income residents of the Fillmore over time. We need to guarantee they restore the 273 affordable units originally at Plaza East, increase the number of below-market-rate units instead of adding market-rate ones, and address our unacceptable safety and habitability issues.

Housing policy that centers developers' power to build what they want, without ensuring they preserve and adequately maintain what they build for low-income tenants, is a recipe for displacement. That's why the People's Plan was created by tenants and housing experts to address racial and social inequality and the decades of displacement faced by people like me. Thank you.



**From:** [Somera, Alisa \(BOS\)](#)  
**To:** [BOS Legislation, \(BOS\)](#)  
**Subject:** FW: Board of Supervisors Nov. 15 Agenda Item 221033 - Public comment on Draft Housing Element 2022 Update  
**Date:** Tuesday, November 15, 2022 7:47:53 PM

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*Alisa Somera*

Legislative Deputy Director  
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1 Dr. Carlton B. Goodlett Place, Room 244  
San Francisco, CA 94102  
415.554.7711 direct | 415.554.5163 fax  
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**From:** Board of Supervisors (BOS) <[board.of.supervisors@sfgov.org](mailto:board.of.supervisors@sfgov.org)>  
**Sent:** Tuesday, November 15, 2022 7:02 PM  
**To:** BOS-Supervisors <[bos-supervisors@sfgov.org](mailto:bos-supervisors@sfgov.org)>; BOS-Legislative Aides <[bos-legislative\\_aides@sfgov.org](mailto:bos-legislative_aides@sfgov.org)>  
**Cc:** Calvillo, Angela (BOS) <[angela.calvillo@sfgov.org](mailto:angela.calvillo@sfgov.org)>; Somera, Alisa (BOS) <[alisa.somera@sfgov.org](mailto:alisa.somera@sfgov.org)>; Ng, Wilson (BOS) <[wilson.l.ng@sfgov.org](mailto:wilson.l.ng@sfgov.org)>; De Asis, Edward (BOS) <[edward.deasis@sfgov.org](mailto:edward.deasis@sfgov.org)>; Entezari, Mehran (BOS) <[Mehran.Entezari@sfgov.org](mailto:Mehran.Entezari@sfgov.org)>  
**Subject:** FW: Board of Supervisors Nov. 15 Agenda Item 221033 - Public comment on Draft Housing Element 2022 Update

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**From:** Lori Yamauchi <[lyamauchisf@gmail.com](mailto:lyamauchisf@gmail.com)>  
**Sent:** Tuesday, November 15, 2022 5:26 PM

**To:** Board of Supervisors (BOS) <[board.of.supervisors@sfgov.org](mailto:board.of.supervisors@sfgov.org)>

**Cc:** Glynis Nakahara <[gnakahara@yahoo.com](mailto:gnakahara@yahoo.com)>; Emily Murase <[emurase@japantowntaskforce.org](mailto:emurase@japantowntaskforce.org)>; PrestonStaff (BOS) <[prestonstaff@sfgov.org](mailto:prestonstaff@sfgov.org)>; Hillis, Rich (CPC) <[rich.hillis@sfgov.org](mailto:rich.hillis@sfgov.org)>; Caltagirone, Shelley (CPC) <[shelley.caltagirone@sfgov.org](mailto:shelley.caltagirone@sfgov.org)>; Small, Maia (CPC) <[maia.small@sfgov.org](mailto:maia.small@sfgov.org)>; Banales, Julian (CPC) <[julian.banales@sfgov.org](mailto:julian.banales@sfgov.org)>; Leon-Farrera, Malena (CPC) <[malena.leon-farrera@sfgov.org](mailto:malena.leon-farrera@sfgov.org)>; De Alva, María (CPC) <[maria.dealva@sfgov.org](mailto:maria.dealva@sfgov.org)>; Ionin, Jonas (CPC) <[jonas.ionin@sfgov.org](mailto:jonas.ionin@sfgov.org)>; Alice Kawahatsu <[alikakawa@gmail.com](mailto:alikakawa@gmail.com)>; Jeremy Chan <[jeremy.lee.chan@gmail.com](mailto:jeremy.lee.chan@gmail.com)>; Mark Moriguchi <[moriguchicpa@sbcglobal.net](mailto:moriguchicpa@sbcglobal.net)>; Susie Kagami <[skagami@japantowntaskforce.org](mailto:skagami@japantowntaskforce.org)>

**Subject:** Board of Supervisors Nov. 15 Agenda Item 221033 - Public comment on Draft Housing Element 2022 Update

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

President Walton and members of the Board,

I am Lori Yamauchi, a 41 year resident of San Francisco. I serve on the board of the Japantown Task Force, whose mission is to preserve and develop San Francisco's Japantown.

As one of three remaining Japantowns in the country, San Francisco's Japantown is a community that has been eviscerated by government policy, through the WW II incarceration and the City's Redevelopment program.

Japantown Task Force has been engaged in discussions with the Planning Department about the Housing Element over the past two years. Japantown has long enjoyed a collaborative relationship with the Planning staff, since it became San Francisco's first cultural district in 2013. The Task Force greatly appreciates that the 2022 Housing Element is focused on racial and social equity, with attention to communities of color harmed by governmental actions.

The Task Force affirms the need for more housing, particularly affordable housing, in Japantown. We appreciate that Japantown has been designated in the Housing Element as an Area of Vulnerability and therefore a Priority Equity Geography. At the same time, Japantown is located along Geary Boulevard, a transit corridor, where the Housing Element is promoting more housing and is located in a Well Resourced Neighborhood.

Given its past collaboration with Planning staff, Japantown Task Force was surprised when it discovered in the April Draft EIR for the Housing Element that the Planning staff was evaluating potential rezoning to increase the height limit from 50' to 240', a nearly fivefold increase, and removal of housing density limits on the superblocks between Laguna and Fillmore, where the Peace Plaza, malls and theater are located. We were assured that the

height limit increases are a hypothetical and not a legislative proposal, and any changes in zoning in a Priority Equity Geography like Japantown will not occur unless requested through community-led processes. However, we were concerned about the signals to property owners that the Housing Element maps send about potential height increases and the inflationary pressures on property value.

Since registering our concerns with the Planning Commission and staff over the past few months, we were notified today by Planning staff (and heard Director Hillis state to Supervisor Preston) that **no rezoning of Japantown will occur unless requested by community led processes, and Japantown has been REMOVED from the increased height limit and density maps.**

The Task Force looks forward to engaging our community in working with the City on creating an area plan, building on previous planning processes, to inform the development of community benefits that would mitigate effects of new development with affordable housing.

Thank you for receiving my testimony.

Sincerely,

Lori Yamauchi

**From:** [Board of Supervisors \(BOS\)](#)  
**To:** [BOS-Supervisors](#); [BOS-Legislative Aides](#)  
**Cc:** [Calvillo, Angela \(BOS\)](#); [Somera, Alisa \(BOS\)](#); [Ng, Wilson \(BOS\)](#); [De Asis, Edward \(BOS\)](#); [BOS Legislation, \(BOS\)](#)  
**Subject:** FW: Public comment re: Housing Element, 11/15/22  
**Date:** Tuesday, November 15, 2022 5:32:50 PM

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**From:** Denise Wong <denise@hrcsf.org>  
**Sent:** Tuesday, November 15, 2022 5:25 PM  
**To:** Calvillo, Angela (BOS) <angela.calvillo@sfgov.org>  
**Subject:** Public comment re: Housing Element, 11/15/22

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Hello,

I am writing to submit public comment regarding the housing element for the 11/15/22 Board of Supervisors meeting. My comment is below:

Good afternoon Supervisors,

My name is Denise Sicat Wong and I am the Staff development Director at Housing Rights Committee of San Francisco. I'm here to urge you to adopt the **Citywide People's Plan for Equity in Land Use** as the foundation of your housing policy priorities for the next eight years.

I am particularly concerned about the city's current plans to construct 272 units of market rate housing in the Plaza East community, a complex in the heart of the Fillmore District.

The Fillmore was once a thriving hub for the city's now dwindling Black community, and it is shameful that the city is considering a proposal that will indubitably accelerate displacement and exacerbate racial inequity. I'm here to echo the community's demands that this provision be unequivocally removed.

If it were effective to concentrate on increasing the supply of market-rate housing and ignoring the needs of our diverse San Francisco community, it would have worked by now.

Eight years and thousands of vacant luxury units later, it's pretty obvious that it hasn't. Please consider **REAL** solutions to the housing crisis by investing in housing for our working class communities, dropping the privatization of Plaza East, and adopting the People's Plan. Thank you.

Thank you,

Denise Sicat Wong

Sent from my iPhone

**From:** [Christopher Roach](#)  
**To:** [BOS Legislation, \(BOS\)](#)  
**Subject:** Letter in regard to the Housing Element 2022 Update at the Board of Supervisors hearing today  
**Date:** Tuesday, November 15, 2022 2:01:08 PM  
**Attachments:** [2022.11.15\\_Housing Element Letter.pdf](#)

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Hello,

I would like to submit the attached letter for display today at the Board of Supervisors hearing today in response to the Housing Element 2022 Update (file number 221033).

Thank you,

Chris

+

Christopher A. Roach AIA IIDA LEED *(he/him/his)*

**Principal**

**Studio VARA**

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**SAN FRANCISCO'S HOUSING ELEMENT 2022 UPDATE, SFBOS FILE #221033:**

Director Hillis, and Members of the Board of Supervisors,

On behalf of the AIA San Francisco's Public Policy and Advocacy Committee, I would like to respectfully submit the following statement and comments on the November final draft of the San Francisco Housing Element 2022 Update. We have reviewed several drafts of the Housing Element, have participated in discussions with the Planning Department and our constituents, and as design professionals working within the jurisdiction of the City and County of San Francisco, have a vested interest in ensuring the thoughtful implementation of development policy and procedures that will have a profound effect on our great city's built environment.

We highly appreciate and applaud the Planning Department and their staff in the monumental and historic effort to center this 2022 Housing Element update in racial justice and equity, and support both the process of developing this document and the many goals, policies, and actions that it contains to guide the development of housing toward a more just, equitable, and resilient city. The PPAC therefore supports the Housing Element's vision for adjusting the zoning in high-opportunity areas of the city to create the potential capacity for the additional housing we need to meet the State's RHNA goals and create a more equitable and accessible city for both current and future citizens.

However, as the Housing Element's own constraints analysis states, we need to do much more to remove the additional layers of process and discretionary review that currently plague our entitlements and production system, otherwise the additional zoning will be an empty promise and fail to deliver the additional housing we so clearly need. Therefore, it is critical that the Board of Supervisors adopt this Housing Element, and not add any additional constraints, requirements, or process, and rather work with the Planning Department to further remove these barriers that add cost and time, and ultimately make even small-scale improvements and increases infeasible to ordinary citizens. In particular, we recommend that the Board of Supervisors, Planning Commission, and Planning Department work together to implement the following process improvements:

- **Optimize the approval and appeals path.** There are too many appeals chains which increase risk and cost to projects, but don't actually result in better projects – most appeals to the Board of Appeals, for example. Reducing the over-use of CUs will greatly reduce the workload on Planning Staff and time spent by the Planning Commission on hearings for projects that should be by-right, and eliminate many appeals to the Board of Supervisors. Every appeals path should be reviewed and revised, including Discretionary Review and the Board of Appeals. Some of these may require amendments to City codes, or even to the Charter, but the Housing Element and associated legislation can at least recommend a reform package for the various project approval and appeals processes.
- **Curb over-use of Conditional Use requirements.** Conditional Use authorization can be a useful planning tool for specific uses and features which risk detriment to neighbors, but which may be necessary or desirable under specific circumstances. However Conditional Use authorization is overused in our Planning Code, in ways which are detrimental to our housing

goals. Many projects which are consistent with our housing goals require conditional use authorization. Requiring CU adds unnecessary cost, delay, and risk to these residential projects.

- ◆ **Adopt more objective standards for the majority of projects, and reserve Design Review only for projects with large and substantial impacts, or that seek exceptions to those standards.** The vast majority of housing projects, especially small to medium projects, have little to no impact on their context if they comply with existing form-based codes, and should not have to re-negotiate those codes on a project-by-project basis. As a baseline, we should trust the Planning Code's current standards to be adequate to guide the design of new buildings to be assets to the existing fabric. The adoption and implementation of objective standards for a variety of building sizes and typologies could help codify and clarify those codes while providing clear guidance and eliminating guesswork and risk, thus lowering the barriers to development, especially for small-scale or private family project sponsors.
- ◆ **Create a process for large project approvals through planning code, rather through spot rezoning and elaborate development agreements.** The Planning Code should include procedures for approval of large projects – including standards for creating a human-scaled pattern of blocks, lots, and public open spaces, exceptions from rear-yard requirements where exceptions would create a stronger open pattern on the block, permitting complementary commercial uses to foster walkable neighborhoods, etc. The City's current practice for the development of large lots, which involves elaborate Development Agreements negotiated outside the Planning Department and or spot rezoning of parcels, adds risk and cost to large projects, maximizes uncertainty for both developers and residents, and undermines the rule of law.

The Board of Supervisors should therefore approve the proposed Housing Element Update without revisions, but should introduce legislation today to address these process improvements so that they are ready to take effect early in 2023 as the rezoning process gets underway. This will help ensure that HCD will accept and approve this Housing Element, and thereby helping the city avoid the potential for the State to utilize the "Builder's Remedy" Zoning Holiday, withholding of affordable housing and transportation funding, and other penalties that could be incredibly disruptive and detrimental to our achievement of our shared goals. Rather, these streamlining and process improvement measures will help ensure that the increased potential capacity of the rezoning will actually result in new housing getting built, and thus give the city some hope that it will be able to achieve the RHNA goal of providing 82,000 new units in the next eight years.

It is also critical that we combine these streamlining and process improvement measures with empowerment of the Planning Department to implement them, through respecting the professionalism and hard work of the leadership and staff who have produced this Housing Element, and providing them with the time and resources to do the hard work of reviewing the thousands of individual projects that must be approved each year to stay on target.

This is an incredibly ambitious goal, but one that we must rise to the occasion to meet if we are to have any hope of building a just, equitable, and resilient city. The time to act is now.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Chris Roach', with a long horizontal flourish extending to the right.

Christopher Roach AIA, Chair, SF AIA Public Policy & Advocacy Committee



**From:** [Mchugh, Eileen \(BOS\)](#)  
**To:** [Calvillo, Angela \(BOS\)](#); [Somera, Alisa \(BOS\)](#); [Major, Erica \(BOS\)](#); [BOS Legislation, \(BOS\)](#)  
**Subject:** Fwd: 2022 Housing Element - for distribution to all Supervisors  
**Date:** Tuesday, November 15, 2022 10:10:11 AM

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For the file

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**From:** lgpetty <lgpetty@juno.com>  
**Sent:** Tuesday, November 15, 2022 2:15 AM  
**To:** Send BOS <Board.of.Supervisors@sfgov.org/>; BOS-Legislative Aides <bos-legislative\_aides@sfgov.org>  
**Subject:** 2022 Housing Element - for distribution to all Supervisors

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## **Re: 2022 Housing Element Final Draft**

### **November 15, 2022 Hearing**

Dear Supervisor,

This is Lorraine Petty, longtime affordable housing and tenant advocate for seniors and people with disabilities.

It looks very much like the 2022 Housing Element will be approved by the Planning Commission and the Supervisors eventually, as the city has been given no other viable option.

As you know, the Housing Element is designed to comply with harsh State mandates that impose impossible building quotas led by market rate housing, and, under the banner of “streamlining,” force the removal of current paths for public participation and protection—DR’s, CUA’s, hearings, appeals, notifications, and more.

In the proposed Housing Element, these are considered obstacles holding up speedy production. Planning suggests that replacement of them by a new racial and social equity Planning Division will suffice instead--developers and communities will be brought together in harmonious agreement by

“mitigations” or “community benefits.”

What’s missing here, in over 1,000 pages, is any plan for enforcement, or to provide guarantees, that neighborhoods, communities and cultural groups can be full partners, equal with the Planning Department and Developers, in all development and planning proposals. The Housing Element has many words of encouragement for community input, but **no penalties for developers who will not listen or even sit down in the same room with community members.** This must be addressed, or we will never achieve racial, social and economic equity. I’m hoping the Board can offer recommendations for improvement in this and other crucial areas of the Plan.

The Housing Element also needs to include an unambiguous, clear commitment to put affordable housing first-- ahead of market rate housing. If not, we will end up with mostly luxury housing for transient future residents who have no interest in building community, while we exile or make homeless our working and middle classes, including all our essential workers.

In addition, the Housing Element must be instructed to include much stronger anti-displacement provisions: more effective demolition controls, better tenant compensation, plus limits on lot consolidations.

The Housing Element must also contain a firm pledge to abide by existing Community Plans and those developed by communities in the future.

Finally, the Housing Element must stand up for San Francisco and its people with a commitment to a single preferred rezoning Scenario, rather than offering three Scenarios which will open the door to the State choosing for us. My hope is that Supervisors will recommend the Transit Corridor Only Scenario as it is the one that brings the least destruction to our neighborhoods.

I believe the above are improvements to the Housing Element that are absolutely critical to achieving a strong, equitable, diverse, affordable San Francisco.

Thank you for your consideration.

Lorraine Petty

Member,

Senior & Disability Action, and SF Tenants Union

(writing on my own behalf)

**From:** [Board of Supervisors \(BOS\)](#)  
**To:** [BOS-Supervisors](#); [BOS-Legislative Aides](#)  
**Cc:** [BOS-Operations](#); [BOS Legislation, \(BOS\)](#); [Calvillo, Angela \(BOS\)](#); [Mchugh, Eileen \(BOS\)](#); [Somera, Alisa \(BOS\)](#); [Ng, Wilson \(BOS\)](#); [De Asis, Edward \(BOS\)](#)  
**Subject:** FW: SF's housing plan hearing is TOMORROW—send an email now - File No. 221033  
**Date:** Monday, November 14, 2022 2:34:46 PM

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Dear Supervisors,

Please see the following constituent communication regarding:

**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.

Regards,

**Richard Lagunte**  
**Office of the Clerk of the Board**  
**San Francisco Board of Supervisors**  
1 Dr. Carlton B. Goodlett Place, Room 244  
San Francisco, CA 94102  
(415) 554-5184 | (415) 554-5163  
[richard.lagunte@sfgov.org](mailto:richard.lagunte@sfgov.org) | [www.sfbos.org](http://www.sfbos.org)

Pronouns: he, him, his

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**From:** Dennis Hong <dennisjames888@yahoo.com>  
**Sent:** Monday, November 14, 2022 2:07 PM  
**To:** Board of Supervisors (BOS) <board.of.supervisors@sfgov.org>; SF YIMBY <sfyimby@yimbyaction.org>

**Cc:** Laura Foote <laura@yimbyaction.org>; Corey Smith <corey@sfhac.org>; CPC-Commissions Secretary <commissions.secretary@sfgov.org>; Breed, Mayor London (MYR) <mayorlondonbreed@sfgov.org>; Asbagh, Claudine (CPC) <claudine.asbagh@sfgov.org>; Hillis, Rich (CPC) <rich.hillis@sfgov.org>; White, Elizabeth (CPC) <elizabeth.white@sfgov.org>; CPC.HousingElementUpdateEIR <CPC.HousingElementUpdateEIR@sfgov.org>

**Subject:** Fw: SF's housing plan hearing is TOMORROW—send an email now

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

Hello everyone, its Dennis I hope you are all doing well. Its Nov 14.

Good afternoon Honorable Members of the SF Board of Supervisors and everyone. I would be remiss if I did not do a follow up to this SFPD DEIR ref to the SF Housing Element's DEIR. Its has been a completed process. But I hope my previous emails to every one especially - of July 11-12, 2022 will help with your Nov 15, 2022 meeting as well.

I believe one of my previous emails/letters here was under #15 below. I hope it will help with your decision/s to help with the up coming Housing issues, including all of the \*CA State Bills and AB Bills.

I'm not sure when more of these Housing issues will be on your agenda again, but please use my comments as submitted. Rambling right along:

This is a cut and paste from the July 19, 2022 BoS Agenda – item #220806 below:

**[{220806 [Petitions and Communications] Petitions and Communications received from July 7, 2022, through July 14, 2022, for reference by the President to Committee considering related matters, or to be ordered filed by the Clerk on July 19, 2022. Personal information that is provided in communications to the Board of Supervisors is subject to disclosure under the California Public Records Act and the San Francisco Sunshine Ordinance. Personal information will not be redacted. \*From the Office of the Mayor, making an appointment to the following Body.**

**From concerned citizens, regarding housing. 2 Letters. Copy: Each Supervisor. (15).]**

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## **NOTES:**

✓ A. Because I just received this request, I hope my comments here can submitted as my remote call in or my earlier email of 7/12 and then some.

✓ B. \*We need to act fast or else there is a possibility of losing out on more either

State and or Fed funds, fines, example recently losing out on some recently CA Homeless funds.

✓C. We still need support with the 469 Stevenson Housing Project. As promised I'm still following up on my comments, have not gotten far with it.

As always, if anyone has any questions to my rambling email here please feel free to get back to me here.

Can someone get back to me confirming my email has been received?

All the best and thanks to all for what you all do with our City issues.

**Dennis**

----- Forwarded Message -----

**From:** Robert at SF YIMBY <sfyimby@yimbyaction.org>

**To:** "dennisjames888@yahoo.com" <dennisjames888@yahoo.com>

**Sent:** Monday, November 14, 2022 at 09:30:47 AM PST

**Subject:** SF's housing plan hearing is TOMORROW—send an email now

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**Send one email to fix San Francisco's housing plan**

Tomorrow, the Board of Supervisors is going to hold a hearing on San Francisco's housing plan for 2023–2031, and [this is your chance to make your voice heard](#). The plan, called the *housing element*, will decide whether we will be able to fix our housing crisis in the upcoming years.

There is a lot at stake tomorrow. The Board of Supervisors can tell the Planning Department what changes to make in the plan, and they need your input. The last draft of the housing plan was reviewed by the State of California, and the state found major issues. We have a chance to show our leaders that we are paying attention, and that we want them to fix the plan's issues. **This may be our last chance before the housing element is finalized.** Send an email today to make sure our city's leaders hear you.

[Send An Email Now](#)

## Give public comment tomorrow after 3 PM

Can you call in on Tuesday afternoon? [Sign up for notifications](#) and a volunteer will text you when the lines are open for public comment and give you resources to make your voice heard.

[Sign Up For Public Comment Notifications](#)

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[SF YIMBY](#) is a chapter of [YIMBY Action](#), a network of pro-housing activists fighting for more

inclusive housing policies and a future of abundant housing.

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**From:** [Board of Supervisors \(BOS\)](#)  
**To:** [BOS-Supervisors](#)  
**Cc:** [BOS-Operations](#); [BOS Legislation](#); [\(BOS\)](#); [Calvillo, Angela \(BOS\)](#); [De Asis, Edward \(BOS\)](#); [Entezari, Mehran \(BOS\)](#); [Mchugh, Eileen \(BOS\)](#); [Ng, Wilson \(BOS\)](#); [Somera, Alisa \(BOS\)](#)  
**Subject:** FW: Housing Element  
**Date:** Monday, November 14, 2022 9:32:14 AM  
**Attachments:** [Citywide People's Plan 2022.pdf](#)

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**From:** Joseph Smooke <joseph@peoplepowermedia.org>  
**Sent:** Sunday, November 13, 2022 7:53 PM  
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**Cc:** Race & Equity in all Planning Coalition (REP) <repsf@googlegroups.com>  
**Subject:** Housing Element

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Dear Board of Supervisors and Planning Commission

The Race & Equity in all Planning Coalition (REP-SF) is submitting the attached Citywide People's Plan for Equity in Land Use in reference to the following hearings regarding the Housing Element 2022

Update:

Board of Supervisors Agenda for Tuesday, November 15, 2022, Item #23, File #221033

and

Planning Commission Agenda for Thursday, November 17, 2022, Item #13 (2019-016230ENV); and  
Item #14 (2019-016230GPA)

Respectfully,

--Joseph Smooke on behalf of the Race & Equity in all Planning Coalition

co-founder of [People Power Media](#)

**[Creators of PRICED OUT](#)**

**[See the animation that will change the way you think about housing!](#)**



# CITYWIDE PEOPLE'S PLAN 2022

**For Equity in Land Use**

*A New Foundation for San Francisco's  
Housing Element 2023 - 2031*

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# REP-SF Member Organizations



West Side  
Tenants  
Association



SAN FRANCISCO SAFEHOUSE



COMMUNITIES  
UNITED FOR  
HEALTH AND  
JUSTICE



SF POWER



Neighborhood  
Council  
since 1960



# Summary

- REP- SF organizations have written community development plans for decades that are focused on racial, social and economic equity.
    - » This is the first time these community plans have been compiled into a **Citywide People's Plan for Equity in Land Use**.
  - These community plans must serve as the foundation for all San Francisco land use plans and housing policies, especially the Housing Element which [aspires to center racial and social equity](#).
  - The State of California and Association of Bay Area Governments have assigned a mandate that San Francisco must ratify a set of housing policies in its 2023-2031 Housing Element that will result in 82,069 new housing units with 46,598 (57%) of those being affordable to households that have low to moderate incomes.
- The current Housing Element's reliance on market rate housing will result in the City falling short of its overall production mandates, and even more deficient in its affordable housing production. SF is already suffering from lack of new affordable housing for at least the past eight years. Focusing resources and strategies on affordable housing is the only way to overcome this deficit.
  - This Citywide People's Plan says to prioritize building the affordable housing first:
    - » Expand the types of sites that are eligible for 100% affordable housing development and building acquisitions throughout the entire City;
    - » Fund affordable housing development differently, leveraging all levels of government as outlined in the Action Plan;



- » Expand development capacity at San Francisco's community-based affordable housing development organizations and at the City;
  - Aggressively purchase sites to be land banked in all areas of the city (purchased by San Francisco, community-based affordable housing developers and held for future affordable housing development as development funds become available).
    - » Low-income, American Indian, Black and other Communities of Color must be the ones who lead the prioritization of sites to be purchased for affordable housing development.
    - » Low-income, American Indian, Black and other Communities of Color residents must be the ones who define what "affordable" means for meeting the equity needs of each community.
  - Efforts to "streamline" market rate housing approvals must retain community input:
- » The participation and expertise of our Cultural Districts and American Indian, Black, and other Communities of Color and low-income communities in development and land use decisions is crucial.
  - » We can retain community input and significantly reduce the entitlement process so projects move expeditiously and predictably from application to a final decision.
  - Demolitions must be closely regulated to protect tenants, otherwise developers will continue to abuse and displace tenants at rates that exceed the harms done during Redevelopment.
  - Achieving these affordable housing goals, and securing the resources needed to achieve these goals must be the priority of San Francisco's housing policies in order to build a city that is truly based on racial, social and economic equity.

***Illustrations by Fred Noland***

***Photographs by Joseph Smooke***





# Land Acknowledgement

This Citywide People's Plan for Equity in Land Use is an offering from generations of people who have struggled in the city called San Francisco. As we bring this compilation of community plans together, to advise city planners and policymakers how to approach the next eight years of housing policies to truly centering racial, social and economic equity, we give thanks to and acknowledge that we are on the unceded ancestral homeland of the Ramaytush Ohlone who are the original inhabitants of the San Francisco Peninsula.

As the original inhabitants of this land and in accordance with their traditions, the Ramaytush Ohlone have never ceded, lost nor forgotten their responsibilities as the caretakers of this place, as well as for all peoples who reside in their traditional territory. As Guests, we recognize that we benefit from living and working on their traditional homeland. We wish to pay our respects by acknowledging the Ancestors and Relatives of the Ramaytush community and by affirming their sovereign rights as First People.

We also acknowledge the contradiction that western systems of land ownership impose on these unceded lands. This western, colonialist system grants land owners monopolistic control over the use of land. There are volumes of City laws that embellish those rights, and the State of California's laws further enrich the rights of owners, title holders, to profit from the land. Increasingly, these State and local laws diminish the rights of citizens to intervene for their own livelihoods, and move our settler constitutional democracy farther and farther away from any meaningful consideration for the Ramaytush Ohlone who have never ceded this land.





# How To Center Racial and Social Equity in City Planning

All organizations in the [Race & Equity in all Planning Coalition \(REP-SF\)](#) are committed to ensuring a future for San Francisco with diverse communities, stable, affordable housing and equitable access to resources and opportunities. This "Citywide People's Plan for Equity in Land Use" is REP-SF's collective vision for a racially, socially and economically equitable San Francisco.

Through community-based initiatives, often in partnership with City agencies, several of REP-SF's member organizations have created a rich collage of land use and housing plans that cover a significant part of the City. These plans are rooted in community, in people, in identity and culture, in principles of inclusive and

holistic planning, and in racial, social and economic equity.

REP-SF has assembled these housing and land use plans into this comprehensive document – the "Citywide People's Plan for Equity in Land Use" which has undergone extensive review and collaborative creation.

REP-SF believes that the analyses and recommendations presented in this People's Plan must be the starting point for any land use plan for San Francisco that is truly grounded in racial and social equity.

As San Francisco's Department of City Planning stated in its "[Draft Racial and Social Equity Impact Analysis](#)": "This is the



first San Francisco Housing Element that will center racial and social equity." The Housing Element is the collection of San Francisco's housing policies, [as mandated by the State of California](#). These housing policies become a component of the [City's General Plan](#). References to the "current" Housing Element are to the 2014 - 22 cycle. References to the "new" Housing Element are to the 2023 - 2031 cycle which is nearing the end of its approval process as we publish this "Citywide People's Plan" in November, 2022.

**REP-SF believes that the analyses and recommendations presented in this People's Plan must be the starting point for any land use plan for San Francisco that is truly grounded in racial and social equity.**

REP-SF is publishing this "Citywide People's Plan" as a reflection of the expertise and experience of our communities that provides a genuine path for the City to meet its racial and social equity goals for its housing policies. Both Planning's approach in drafting the Housing Element and the policies put

forward in the draft did not center racial and social equity. Drafts of the Housing Element were instead grounded in a profit-driven, market-based strategy for building condos across San Francisco. Then Planning invited communities to provide comments on their market-based plan through questions and working groups that Planning directed. Planning's approach was unfortunately antithetical to equitable outcomes because it started with a profit-driven, market-based premise, entirely framed by the ideologies of Planning staff rather than starting from community plans and letting low-income and Communities of Color lead this process and frame the discussions.

As stated in the Mission District's Plan, "MAP2020," which is one of the community plans that was drawn on to form the basis of this "Citywide People's Plan":

*"In the traditional Planning model used by many cities, including San Francisco, the city is the expert, convener, agenda setter and arbitrator. The city retains control and the community's role is to advocate. This model may work in some situations, but does not work well where there is a significant power imbalance or history of distrust between city and community. The groups that tend to participate in the decision-making process have the most power and resources, and are the most comfortable working with authority."*



The Reclaiming Our Space (ROSe) book from the South of Market Community Action Network (SOMCAN) is another of the community plans that combine to form this "Citywide People's Plan. The ROSe book states a similar caution about Planning's standard approach:

*"The process of planning in San Francisco and the United States, however, is from the top down and not the bottom up, oftentimes having negative effects on low income and working class neighborhoods and communities of color. For SOMCAN, community planning or people-centered planning is a process wherein a system of knowledge of the neighborhood or community is gathered and created from the bottom up, from the actual people who live and work in these communities, especially the most vulnerable people."*

The ROSe book further describes what an Equity in Land Use approach would look like,

*"The experts of community and people-centered planning are the people who live or have lived in the neighborhood - the children that go to the schools in these districts, the parents who have multiple jobs, the people with disabilities, the seniors fighting to maintain their residence, and the new immigrants and low-income families struggling to make ends meet. This lens is very different*

*from the gaze of city planners who view land as different zones for profit by billion dollar companies and developers."*

REP-SF acknowledges and appreciates the lengthy process that San Francisco's Department of City Planning led to gather community input into its Housing Element, but this lengthy process was not approached in a way that was centered and focused on racial and social equity. For a planning process to be truly centered on racial and social equity, it must start with the voices, needs, and aspirations of those whose voices are typically not prioritized in planning or land use processes or decisions, with the intention of providing for their needs first.

It is in this spirit, therefore, that REP-SF presents this "Citywide People's Plan for Equity in Land Use" to be used as the new reference point for San Francisco's housing and land use policies and strategies for the next eight years and beyond.

***Community planning or people-centered planning is a process wherein a system of knowledge of the neighborhood or community is gathered and created from the bottom up, from the actual people who live and work in these communities, especially the most vulnerable people.***



# Background and Assessment

At the direction of the State of California, the City and County of San Francisco periodically updates the Housing Element of its General Plan. [The Housing Element](#) establishes San Francisco's housing policies based on estimates of regional job growth. The job growth is calculated and administered by the State's Department of Housing and Community Development (HCD) and the Association of Bay Area Governments (ABAG). The distribution of these regional housing needs among the various jurisdictions of the Bay Area is called the Regional Housing Needs Allocation (RHNA). The Housing Element currently nearing final approval would guide the housing policies from 2023 to 2031.

***Market-rate developers, regardless of the scale or size of their developments, are only interested in those with high-incomes, not middle or low-income.***

The State of California and ABAG have assigned a mandate that San Francisco must ratify a set of housing policies in this Housing Element that will result in 82,069 new housing units from 2023-

2031. Of those, 46,598 of those are to be affordable to households that have low to moderate incomes. A majority, 57%, of all units should, therefore, be affordable for households with low to moderate incomes.

For the new Housing Element cycle, San Francisco's Planning Department started by producing a document called the "[Housing Affordability Strategies](#) (HAS)." The HAS shows how upzoning various parts of the City could allow development of roughly 150,000 new units to meet the goals of [Plan Bay Area 2050](#), and meet the Housing Element/RHNA mandates along the way. Despite its name, Planning's Housing Affordability Strategies is largely a market-based housing production plan that assumes three insufficient strategies for affordable housing. 1) Building more market-based housing supply will lower housing prices. 2) Market-based housing developers will provide roughly 20% of "below market rate" units in their developments. 3) Affordable housing developers will continue building and purchasing 100% affordable housing at relatively the same rate as they have in recent years.

Planning primarily used profit and market-based premises as their starting point. But market-rate housing is funded by profit-motivated capital which



is only interested in investing in markets with increasing rather than decreasing prices. Increasing housing inventory will never result in a drop in prices– new market-rate units will not be built in a declining market.

Together, these strategies incorporated into the Housing Element, add up to provide roughly 70% market rate and 30% affordable housing--which would not meet the RHNA mandate that requires a split of 43% market rate and 57% affordable.

[People of color](#) are more likely than those who identify as White to be living below poverty level in San Francisco. And as the [Housing Element reports in Table 13 of its "Needs Assessment"](#), the household

incomes of those identifying as "White/ Non-Latino" are far higher than the incomes of households that identify as American Indian, Black, Latino, and Asian. Despite a clear trend that market rate housing continues to increase in cost which results in decreasing opportunities for Communities of Color, this new Housing Element continues to hope that profit-driven developers will deliver racial and social equity for American Indian, Black, and other Communities of Color.

The principle underlying this entire Housing Element is that building more profit-driven, market rate housing supply is an essential strategy for meeting the Housing Element's racial and social equity goals. Not only are market-rate housing developers' business plans



developed around profitability instead of racial and social equity and economic inclusion, but there is increasingly an international market that has developed to distract the housing "market" from providing housing for people, but rather, as housing and gentrification experts recently laid out, [tends toward greater commodification and financialization](#).

With each upzoning, and with each "density bonus" conferred to a developer, the value of San Francisco real estate increases. These are the factors that drive the price of real estate and the price of housing for the market. As we've seen through the major recession of 2008 - 2013 and the COVID downturn, even with declining demand, prices of SF real estate have continued to climb because they reflect the value of the City's underlying infrastructure. With the increasing global financialization and commodification of housing, translating this value into prices is an exercise that reveals an increasing dissociation of housing prices from what everyday people who are seeking housing can actually afford.

Under these faulty premises, Planning continued with its work on the Housing Element, and convened Working Groups to gather community input into their market-based plan. Planning's framing for these Working Group meetings was to use a divisive and trickle-down housing approach. During these Working Group meetings, they asked questions such as, "If we were to focus anti-displacement

on certain high-risk communities, which ones, how would we define the target? (Geography, BIPOC, Black and American-Indian, Low-Income)." This type of question pitted communities against each other.

## ***Planning primarily used profit and market-based premises as their starting point.***

Planning staff introduced another Working Group session as focusing on "Potential strategies to support the private sector to produce small multifamily for middle-income households." As noted above, the private, profit-driven sector is not motivated to develop housing that's affordable for middle-income households. Market-rate developers, regardless of the scale or size of their developments, are only interested in those with high-incomes, not middle or low-income. Along these same ideological lines, one of the "key ideas" that Planning promoted during these workshops was to "Advance the social and economic diversity of San Francisco by increasing **housing production** including permanently affordable housing" (emphasis in the original).

Rather than starting with affordable housing, Planning started with the idea that we need to increase market-rate housing production, with some





much smaller amount (roughly 30%) of "permanently affordable housing" mixed in. Relying on market-rate housing production to advance diversity or affordability is trickle-down economics, hoping that taking care of the needs of the richest people will eventually lead to circulation of this largess, so resources trickle-down to meet the needs of everyone else. Of course it never works this way, so those most in need leave San Francisco if they can, and if they can't, more and more San Francisco residents end up on the streets without a home.

REP-SF strongly believes that because the City's approach to the Housing Element started with asking questions that were centered on the market instead of

equity, Planning has, therefore, come to conclusions and recommendations that will cause significant and irreparable harm to San Francisco's low-income, American Indian, Black and other Communities of Color.

***Relying on market-rate housing production to advance diversity or affordability is trickle-down economics.***



# SF's Housing Element is a Repeat of Redevelopment

San Francisco Planning Department's Goals, Objectives, Policies and Actions as currently described in the Housing Element are an aggregation of government actions that support speculative, profit-driven development and displacement. While there are a significant number of equity strategies and tools outlined in the document, we are gravely concerned they will be largely ineffective against the vastly more comprehensive central strategies of the plan based in stimulating market-rate housing.

REP-SF is greatly concerned that the net effect of the Housing Element's policies will have significant similarities to the

harms inflicted on [several Communities of Color](#) such as the Fillmore/ Western Addition, South of Market/ Yerba Buena Center, and Bayview/ Hunters Point during the days of "Urban Renewal" which was also called "Redevelopment."

Looking back at the documents from the San Francisco Redevelopment Agency, there is a quotation from "The Feasibility of Redevelopment In The South Of Market Area" published by the SF Redevelopment Agency on June 1, 1952:

*"The South of Market area is best suited for light industry but it cannot completely fulfill this use until the dead hand of blight is removed. This,*



*redevelopment can do, by removing the old, decayed slum dwellings and inferior structures; by assembling the small inadequate and inefficient lots into parcels of usable size; by improving internal circulation in the large blocks which typify the area; and by stimulating redevelopment by private means within the area."*

The reference to "small inadequate and inefficient lots" seems eerily similar to how SF's current Planning Department describes the less densely developed neighborhoods of San Francisco in the Housing Element proposed for 2023 - 2031. Planning wants private, market-rate developers to combine lots through this Housing Element like how in Redevelopment they strove to create "parcels of usable size."

## ***REP-SF is greatly concerned that the net effect of the Housing Element will be harms on several Communities of Color similar to those during Urban Renewal.***

This 1952 Redevelopment report further defines what were considered "small inadequate and inefficient lots" as being 25 feet wide by 75 to 90 feet deep. Today's lots in the western and

northern parts of the city that are being targeted for upzoning in this Housing Element, such as the Richmond and the Sunset, are pretty much the same size as the "small and inadequate lots" described by Redevelopment in 1952. The neighborhoods that Planning's new Housing Element is now targeting for upzoning and larger scale development are primarily developed with lots that are 25 feet wide by 75 to 100 feet deep. Although the SOMA Redevelopment Plan was describing that these small lots were "small" and "inefficient" for redevelopment as industrial uses, Planning today is confronting the same physical constraints as it attempts to force densely developed residential parts of the City into a much larger and more intense scale of residential development. [Figure 1](#) shows the areas of the City where Planning proposes to increase zoning capacity for greater density of housing. This is excerpted from the Draft Environmental Impact Report published by the San Francisco Planning Department for the 2023-2031 Housing Element.

In order to accomplish what Planning is recommending in its Housing Element, developers will need to purchase a few, or several, adjacent lots, then demolish the existing housing and foundational community supporting businesses, leaving an irreparably broken community fabric. These strategies are gravely concerning because of the similarities between Planning's approach in this Housing Element, that enables and



incentivizes a for-profit developer to buy up existing housing and bulldoze it in order to build a large, new, expensive condo building, and the actions taken by the City's Redevelopment Agency several decades ago.

One major difference is that it's not the government entity (the Redevelopment Agency) buying the properties and bulldozing the residences. Instead, the government entity (SF Planning Department) is proposing to enable and incentivize market rate developers to do what the Redevelopment Agency did which is to purchase existing residences, then bulldoze them to clear the way for larger, denser market rate housing.

As we dug further into the previously referenced Redevelopment Agency report about SOMA, we found the following

assessment of the conditions at that time:

*"The character of the area makes the assembly of property difficult, as owners of residential property, enjoying an income despite blighted conditions, are not prone to dispose of their holdings without the payment of a high premium by the industrial buyer."*

These quotes from the 1950's seem eerily similar to how Planning views the western and northern parts of San Francisco in this new Housing Element. Planning sees existing structures such as two to four story buildings in the Richmond District, for example, as "inadequate and inefficient lots" that should eventually be assembled "into parcels of usable size." What they do not see is that these buildings are more densely populated



than it would seem.

[Figure 2](#) shows all the multifamily housing that has been placed in service during the current Housing Element, based on data provide by the San Francisco Planning Department. This map shows that with the current zoning, developers for the past eight years have found it feasible to develop new multi-unit housing in every part of the City. All of this new development has been adding significant density to the western neighborhoods.

As in the Redevelopment's A-1 phase where residents of the Western Addition were displaced into adjacent low-income neighborhoods, the rezoning of the eastern neighborhoods in the 2000's saw thousands of working-class and lower-income residents of color displaced into overcrowding conditions and to other

low-income neighborhoods, in this case into the western and northern parts of the city such as the Richmond District. Multiple households often live in a single unit, and structures that look from the outside like single family homes are often renovated with additional Accessory Dwelling Units. They are full of families and people with low incomes, displaced from other neighborhoods. Instead of using the infamous bulldozers that were the emblematic tool of "Redevelopment," Planning describes throughout the Housing Element how it recommends various government actions that will add up to have the same effect as the bulldozers by "stimulating redevelopment by private means within the area."

The Redevelopment A-2 phase saw the displaced residents of the A-1 phase who managed to stay in the City by moving





into overcrowding conditions, ultimately completely uprooted and forced these residents from San Francisco. With the current pressures on Black, Filipino, and Latinx communities that are precariously [down to 5.7%, 4.07% and 15.6% respectively](#), it is anticipated that if Planning continues to view upzoning as a next phase solution in already dense urban neighborhoods, and we will see these populations erased from San Francisco during the period of the next Housing Element. Please see [Figures 3 through 5](#) that show where the Black, Filipino and Latinx populations changed from 2010 to 2020 based on data from the US Census.

In Section 1C of the Action Plan, outlined in this "Citywide People's Plan" below, there is a detailed process for addressing demolitions in order to prevent massive displacement of low-income and Communities of Color like what happened during Redevelopment. If the City fails

to adopt such a process for demolitions, the impacts of this new Housing Element could be even more devastating and widespread than during Redevelopment.

***SF Planning is proposing to enable and incentivize market rate developers to do what the Redevelopment Agency did which is to purchase existing residences, then bulldoze them to clear the way for larger, denser market rate housing.***



# A Comprehensive Plan for Affordable Housing

For several decades, Planning's approach has been to devise ways of incentivizing and enabling for-profit, market-based development, while leaving affordable housing strategies to the Mayor's Office of Housing and Community Development (MOHCD). This approach has left the affordable housing community without any kind of land use or significant long term resource plan, and communities are left without a holistic approach to planning resilient, diverse communities.

This has left San Francisco's affordable housing developers to work on a transactional basis, identifying and negotiating for development prospects one at a time without a comprehensive land use and community engagement strategy that is coordinated between Planning and MOHCD. Since Planning is the lead city agency tasked with writing the city's housing policies in response to the State's requirement for a periodic Housing Element, the result is the same market-based approach that Planning always defaults to.

In order for the Housing Element to be approached in a way that truly centers racial and social equity, REP-SF believes that the fundamental question that the Housing Element should have started with was, how can we meet the State's mandated development goals in a way

that puts community expertise and racial, social and economic equity first? And how can we work together as a city, coordinating between city departments, to create a land use and resource plan that puts affordable housing and the needs of low-income and Communities of Color first?

***The City's approach has left the affordable housing community without any kind of land use or significant long term resource plan.***

Starting with a different question would have led to a much different set of actions and strategies which would have truly centered racial and social equity in land use. REP-SF member organizations have already engaged communities around questions that lead to planning for racial and social equity.

As stated in SOMCAN's ROSe report:

***"As SOMA has the highest rate of development than any other neighborhood in San Francisco, it's important to ask who are these developments for? High-***

# ***The Housing Element should start by asking, how can we meet the State goals in a way that puts community expertise, and racial, social and economic equity first? And how can we work together as a city, coordinating between city departments, to create a land use and resource plan that puts affordable housing and the needs of low-income and Communities of Color first?***

*priced market-rate residential and commercial development gentrify and displace working class and immigrant communities in SOMA and across the city. Communities in SOMA must reclaim space and land for working people." These considerations are essential for communities throughout San Francisco.*

We also know that there are structural issues with the way affordable housing is funded. In 2020, the California State Auditor released a detailed report about the funding and administrative barriers to affordable housing development across the State. This [CA State Auditor's assessment](#) concludes "The State Must Overhaul Its Approach to Affordable Housing Development to Help Relieve Millions of Californians' Burdensome Housing Costs." This report is vital because it details how "the State does not currently have a sound, well-coordinated strategy or plan for how to most effectively use its financial resources to support affordable housing." Without

a plan for how to mobilize its financial resources effectively, the State squanders opportunities to partner effectively with local governments, like the City of San Francisco. This, in turn, leads Planners in San Francisco to rely on misguided, market-based strategies for addressing affordable housing needs. The State Auditor's report says:

***"The State plays a critical role in supporting affordable housing development and the Legislature has declared that private investment alone cannot achieve the needed amount of housing construction at costs that are affordable to people of all income levels- including households earning 80 percent or less of their area's median income (lower-income households)."***

Although these structural impediments hinder affordable housing development, the organizations in REP-SF continue to advocate for greater and more effective resources for affordable housing, and some REP-SF organizations (Chinatown



Community Development CCDC, Tenderloin Neighborhood Development TND, Mission Economic Development Agency MEDA) successfully develop significant amounts of new affordable housing through new construction and by purchasing and rehabilitating existing rental housing.

***REP-SF organizations successfully develop significant amounts of new affordable housing through new construction and by purchasing and rehabilitating existing rental housing.***

For decades, community plans have emphasized the need for affordable housing. This is from the Chinatown Plan of 1985:

*"Study after study has documented the need for new housing to meet the needs of Chinatown's low-income residents. Development of new market rate housing does not meet their needs and hastens displacement. It is low-income housing that Chinatown needs."*

With this emphasis on low-income residents, the Chinatown Plan didn't seek to stop housing development. In

fact, it's apparent that at that time, for-profit developers were so focused on building commercial and offices that the Chinatown Plan has detailed requirements for these commercial developers to build new housing to meet the needs of Chinatown's residents.

Likewise, the Mission Area Plan (MAP2020) says very clearly,

*"The objective of this Plan is neither to freeze the neighborhood in time nor to prevent newcomers from moving in but rather to ensure that as change happens those currently living there and their children have the voice, to stay and not be forcibly displaced. It's about preserving the ability for the neighborhood to house all incomes and not lose the affordable rental stock, business and the richness and diversity of the neighborhood along with it."*

The most important feature of all the Plans that are attached is the emphasis on people - on the needs and experiences of people, and the assertion that people live in communities, in neighborhoods, and that we need to plan for both people and neighborhoods, especially around the economic and social needs of those with low-incomes and those who are without shelter.



# Compilation of Community-Based Plans

All of the community plans that REP-SF organizations have already put in place can be found in the folder that's linked from here. These community plans speak to the aspirations and self-determination, and broad engagement and expertise, of various communities across San Francisco in housing, development, land use, and holistic urban planning.

Many of these community plans have been supported by the City through funding and/or support from City staff. These are significant contributions of resources, yet, when the City initiates major land use policies such as the Housing Element, it doesn't start with these community plans, or make reference to them at all. Bringing all of

***The most important feature of all the Community Plans is the emphasis on people. We need to plan for both people and neighborhoods, especially around the economic and social needs of those with low incomes and those who are without shelter.***



these community plans together for the first time shows clearly the breadth of community participation and community expertise in land use and housing issues. This "Citywide People's Plan" also demonstrates the long term commitment of resources by organizations throughout San Francisco to educate and engage communities, to cultivate and support community expertise, in land use, and strategies for empowering historically vulnerable and marginalized communities to build collective power and self-determination through engagement in land use and housing decisions and policies.

There are other community plans that are either in process (e.g. CHHESS reports from other Cultural Districts; updates to the SOMA Youth and Family Special Use District) by REP-SF organizations, or are noteworthy for their focus on equitable strategies and outcomes although not led

by community organizations (e.g. Sunset Forward). Plans will be added to the folder as they are completed. This "Citywide People's Plan" will also be updated from time to time as conditions and strategies change.

***These community plans speak to the aspirations and self-determination, and broad engagement and expertise, of various communities across San Francisco in housing, development, land use, and holistic urban planning.***





# Action Plan

This Action Plan represents the collective expertise and experience of REP-SF's citywide membership, and the breadth of constituencies and communities united in putting forth bold and innovative solutions that center racial and social equity. Creating this Action Plan engaged the entire REP-SF Coalition through a rigorous, inclusive, and intentional process; including multiple working sessions, revisions by dozens of REP-SF members, and REP-SF's leadership development program, "Planning to the People: Land Use and Equity Training 2022," in which 20 new community members - ranging geographically, ethnically, and generationally - became engaged REP-SF leaders and directly shaped this "Citywide People's Plan".

This Action Plan, and the entirety of the Citywide People's Plan, is a testament to the expertise and commitment of REP-SF's membership in advancing a proactive, ambitious agenda to create new systems that will ensure an equitable San Francisco, for our communities now and for generations to come.

## 1. Land Use

This section outlines strategies for identifying affordable housing sites, rezoning for density that facilitates and prioritizes development of affordable

housing, and purchasing sites for preservation and new construction of affordable housing. Currently, the Housing Element uses the framework of "high resource areas" as a rationale for focusing greater intensity and density of development in the Western and Northern neighborhoods of the City, and along certain prioritized transit corridors, but the Housing Element does not prioritize affordability, nor does it present a plan for meeting the RHNA goals for affordable housing. The set of strategies detailed below seeks to refocus the City's land use policies and strategies toward meeting the affordable housing mandates.

***Creating this Action Plan engaged the entire REP-SF Coalition through a rigorous, inclusive, and intentional process putting forth bold and innovative solutions that center racial and social equity.***

Although "[high resource areas](#)", per California's Department of Housing and Community Development (HCD) and

Tax Credit Allocation Committee (TCAC), are intended as areas where 100% affordable housing dollars should be focused, the Housing Element intends to build between 70% and 80% market rate housing in these areas. Despite the RHNA mandates being weighted heavily toward below market rate housing with 57% of the housing targeted to low to moderate income households, the Housing Element as drafted will only yield between 20% and 30% of the housing being affordable to low to moderate income households. Therefore, the intensity and density of development that Planning has proposed for the Western and Northern areas of the City must be reimagined as areas for intensive affordable housing development. There are three significant barriers to this re-visioning towards affordable housing that must be overcome.

First, the City needs to work in coordination at the Local, Regional and State levels to make new capital funding sources available for building affordable housing that are efficient and allow for reasonable per-unit development costs on sites where affordable housing developers can build as few as 10 units. This is not currently feasible because of constraints that come along with typical affordable housing funding sources. Not only are current funding sources for affordable housing not flexible enough to support smaller scale developments that fit practically within San Francisco's urban fabric, but the scale of funding sources is not available. REP-SF and the Council of Community Housing Organizations (CCHO) estimate that San Francisco will need approximately \$4 Billion per year for the eight year duration of the Housing Element in order to meet the affordable housing mandates. A plan for funding



affordable housing is in Section 2 of this action plan.

## ***The City needs to work in coordination at the Local, Regional and State levels to make new capital funding sources available for building affordable housing.***

The second barrier that must be overcome is securing sufficient land. A crucial strategy for securing land is to land bank as many sites as possible that are eligible for affordable housing under this new financing vision. This is the only way that this Housing Element will succeed in meeting its production mandates and its equity goals- by ensuring that we have the resources and land use strategies that prioritize development of affordable housing throughout the entirety of San Francisco. A plan for acquiring land for affordable housing is in Section 1 of this action plan.

A key strategy that is not emphasized enough throughout Planning's Housing Element, but is a core strategy in community plans is the acquisition and rehabilitation of existing apartment buildings and Single Room Occupancy (SRO) buildings. San Francisco's Community Opportunity to Purchase Act

(COPA) provides "qualified nonprofits" with negotiating priority to purchase these buildings, but the biggest impediment to bringing this program to scale has been a lack of funding. There are strategies to expand this strategy in the Action Plan below.

We appreciate the understanding that Priority Equity Geographies should be excluded from some of the increased market-rate housing upzoning and streamlining prescribed, and allow community-led processes for mitigating market-rate projects. This equity lens should be expanded to include additional areas where harms can be expected from these provisions, such as the high displacement risk areas identified in the Urban Displacement Project's [California Estimated Displacement Risk Model](#) and Cultural District areas. Similarly, these Cultural Districts are appropriately identified as needing special resourcing including funding to grow community businesses and the opportunity to give input on all housing projects. These areas should be clearly given relief from the upzoning and streamlining elements in the plan, rather than the partial mitigation policies that seem to be prescribed such as consultation in zoning changes and market-rate housing streamlining in exchange for unspecified stabilization benefits.

These are some of the major, new concepts that REP-SF recommends. The following list of Land Use related Action



Items provides further detail addressing a comprehensive set of strategies for Equity in Land Use.

## **1A. A Real Plan for Meeting Affordable Housing Mandates**

The City must develop and acquire/rehabilitate a total of 56,000 affordable housing units, approximately 46,000 from this current cycle plus approximately 10,000 deficit from last cycle. To break this down, this would mean nearly **5,100 new affordable units** in every one of San Francisco's eleven Supervisorial Districts by the year 2031.

MAP2020 (attached) already has established an affordable housing production goal of 1,700-2,400 affordable

units specifically for the Mission. This goal needs to be updated regularly to reflect additional needs since MAP2020 was published, the number of units actually completed, and units lost through demolition and conversion.

***The Housing Element as drafted will only yield between 20% and 30% of the housing being affordable to low to moderate income households.***

In order to meet these goals, communities working with the City must identify affordable housing development



sites in all 11 districts including publicly owned lands, and make sure that the total number of affordable units these sites will yield matches or exceeds the RHNA mandates. REP-SF encourages a community-based process to identify priority areas and priority sites.

- I. Work with low-income, American Indian, Black and other Communities of Color to identify and prioritize opportunity sites for affordable housing.
- II. Communities and nonprofit developers to work collaboratively with the City to design and implement an aggressive site acquisition and land banking strategy in order to secure and hold as many of the development sites as possible.
- III. Include sites throughout the Western and Northern areas of the City, where sites are typically small, and often less expensive than in more intensely zoned and developed parts of the city, through new funding models described in Section 2.
- IV. While targeting affordable housing for development in the Western and Northern areas, the City must not exclude ongoing significant investment in new affordable housing opportunities in the Eastern and Southern areas of the City (Priority Equity Geographies). There should be an overall increase in the amount of resources available for affordable housing, and an equitable distribution

of those resources throughout the City.

- V. Include sites owned by religious institutions which have streamlined rezoning for affordable housing per prior ballot initiative.

***A crucial strategy for securing land is to land bank as many sites as possible that are eligible for affordable housing.***

- VI. Restrict development on publicly owned lands for 100% affordable housing, locally owned small businesses, and nonprofit organizations, especially community-based organizations. Adopting a framework of 100% affordable development on publicly owned land would create a major pool of land resources to maximize and lower the cost of affordable development.
- VII. The term "affordable" must be defined by low-income, American Indian, Black and other Communities of Color in terms that meaningfully promote community stability and uphold a right to housing. Potential standards may include, but are not limited to:
  - patterns of displacement: reparations for historical harms, affordability based on displaced house-

holds' ability to return to their communities in SF;

- housing our essential workforce to sustainably live in the city they serve;
- ensuring that affordability is accessible to the youth coming up in the city, to people with disabilities, and to the elders that struggle to affordably age in place on limited fixed incomes, and based on the needs of current residents struggling to remain in their communities.
- going beyond the limiting standards set by federal, state, and local programs that nominally subsidize rents without achieving true affordability.
- reviewing the standard of affordability that households should pay 30% of their income toward their housing expenses. There is a proposal that payment standards be

set with a "[residual income](#)" [measure](#). While this would generally result in reinforcement of the 30% standard, those with extremely low-incomes, and those in permanent supportive housing, would likely have their payment standard lowered to more appropriately reflect their ability to pay relative to other living expenses.

VIII. Increase the percentage of units in 100% affordable buildings that are dedicated to households with extremely low and zero incomes, and ensure that appropriate levels of resources and funding are committed for additional intensive staffing required to ensure success.

A. Households with extremely low and zero incomes include: families in shelters, families crowded into SRO's, people currently living on the street, and others living in





overcrowded and unpermitted situations.

***There needs to be 5,100 new affordable units in every one of San Francisco's eleven Supervisorial Districts by the year 2031.***

### **1B. Public Input & City Processes**

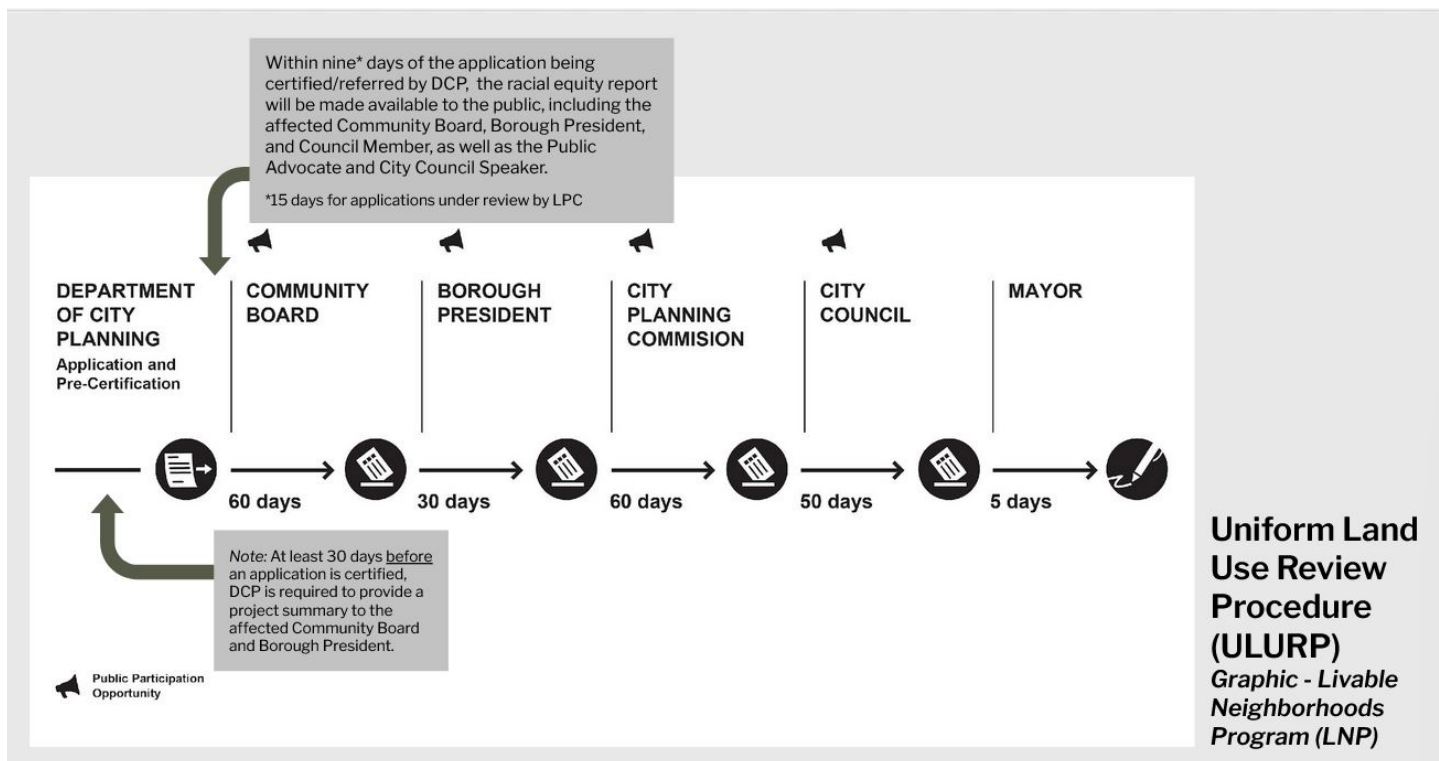
The City must establish a new project approval and entitlement process for market rate housing developments that retains public input and process, but has clear time frames for each part of the

process, so project reviews and approvals can take far less time than they do today while retaining democratic, public participation in the process.

**I. Our Cultural Districts and American Indian, Black, and other Communities of Color and low-income communities must retain the right to participate in development and land use decisions.**

II. Develop an entitlement review process that retains public input and participation while significantly shortening project approvals. This can be achieved by committing to statutory time frames for each step of the entitlement process so projects move expeditiously from application to a final decision. One example to work from is the Uniform Land Use Review Procedure in New York





City where the first step of the process takes only 60 days, but engages the public in a public meeting before the neighborhood-based Community Board along with the developer. Meetings are in the community, in the evening to ensure broad participation. The project cannot move forward until the Community Board finalizes recommendations based on the community input. These recommendations are submitted from the Community Board to Planning staff. This entire process must be completed within 60 days.

Although New York's process is citywide and comprehensive in its management of the entire entitlement process, we have a similar process here in San Francisco for how the "Community Board" part of the review process could be managed. San Francisco's Bernal Heights neighborhood has had a similar process in place for

decades through the [Northwest Bernal Heights Design Review Board](#).

This is a [resource](#) describing the history of Community Boards in New York City, how they function, what their budget is, etc. This is another [resource that recommends updates and changes](#) to NYC's Community Boards.

***The City must identify affordable housing development sites in all 11 districts including publicly owned lands.***

III. Similar to the analyses required in New York, incorporate an equity analysis into the new approval process.

A. At a minimum, require developers to provide a demographics

report about the neighborhood surrounding their proposed development, along with detailed information about what the developer is proposing to build. REP-SF recommends looking to [New York City's Equitable Development Data Explorer](#) as a model.

***The term "affordable" must be defined by low-income, American Indian, Black and other Communities of Color in terms that meaningfully promote community stability and uphold a right to housing.***

- B. REP-SF recommends reviving the [Healthy Development Measurement Tool](#) that Planning developed jointly with the Department of Public Health during the Eastern Neighborhoods rezoning in the 2000's. This HDMT provided critically important data about communities, and enabled evaluation of proposed developments and whether they furthered the building of healthy, holistic communities.

[plain language](#), translated into all of the City's official languages with a 3-dimensional drawing and clear description of what project is being proposed for the site. Currently, Planning notices that are posted at development sites are a jumble of code references, without any clear, plain language description of what the developer is proposing to demolish and/ or build.

## **1C. Demolitions**

Planning's new Housing Element recommends demolition of existing housing in a number of its strategies. Even without these new policies that encourage demolition, our communities have suffered massive displacement from demolitions as evidenced by the [Housing Balance reports](#). Without the following recommendations, the Housing Element will continue to be tantamount to an Urban Renewal or Redevelopment strategy as described above. REP-SF strongly recommends the following new policy be included in the Housing Element and pursued on a priority basis:

- I. A Conditional Use Permit will be required for every residential demolition and "tantamount to demolition." The Planning Department has recommended that there only be a public hearing if the residences are tenant-occupied, but current experience in our communities tells us that tenant advocates often need to

IV. Planning notices should be in [clear,](#)

force public hearings in order to reveal that tenants have either been forced to leave, or are still living at a property that a developer represents to Planning as being "vacant."

- II. If there are any rent controlled units existing at the property, every one of those rent controlled units must be replaced in the new development one for one.
  - For clarity, "rent controlled units" include the following pre-1979 structures: multiple but separate residential structures on a single property; single family homes with ADUs; single family homes with multiple, separate leases.
- II. These "replacement rent controlled units" are additional to any BMR units that the developer is required to provide.
- III. If the units proposed to be demolished or are proposed for extensive rehab that is "tantamount to demolition" are occupied, the developer must pay for temporary relocation for all occupants to other rental housing within San Francisco for the duration of the development. The developer will be responsible for finding this temporary housing, and will also be responsible for paying the difference between the tenant's current rent and the rent in the temporary rental unit for the

entire duration of the temporary relocation.

- IV. The developer will pay all expenses for the tenant to relocate to the temporary housing, then will also pay all expenses for the tenant to relocate back to the newly constructed project.
- V. The developer will have these same obligations to all occupants at the property, including tenants and subtenants, and anyone living at the premises whether on a lease or not.
- VI. Once the development is completed, and the tenants return into their newly constructed, rent-controlled units, their initial rent will be the same as the rent had been prior to their temporary relocation, with the appropriate annual Rent Board increases applied.
- VII. If there has been a buy-out, or no-fault eviction at the property, including by Ellis Act or Owner-Move-In, the request for demolition will be denied.

## **1D. Affordable Housing: Acquisition, Preservation, and Enforcement**

Achieving these historically ambitious levels of affordable housing production will require investment in capacities and



strategies that have never been made before. Nonprofit, community-based affordable housing developers need to increase their staffing. The Mayor's Office of Housing will be managing projects and funding sources on a huge, new scale which will require additional staffing. Even the Planning Department will have to create a new permit review and expediting team that focuses on affordable housing developments. In addition, we need to be creative about how we approach existing buildings and other creative ways to create new affordable housing that go beyond just thinking about starting new construction from scratch.

- I. Invest in additional project management capacity throughout the network of San Francisco, community-

based affordable housing developers, and at the Mayor's Office of Housing and Community Development.

- II. Invest in a permit review team at the Planning Department that has expertise in affordable housing developments.
- III. Tenants at Plaza East demand that Plaza East remain 100% affordable.

***Without the following recommendations, the Housing Element will continue to be tantamount to Urban Renewal.***



- A. The 270 market rate housing units that the City has included in the sites inventory for new market rate units must be removed.
- IV. REP-SF strongly urges adaptive re-use of unused commercial office buildings as affordable housing, beginning with an analysis of the unrealized potential in vacant commercial office buildings to yield affordable housing.
  - A. This strategy should include a plan for statewide advocacy for funding since this is not an opportunity that is entirely unique to San Francisco, and will require resources beyond what our City can provide.
- V. Need to support low-income homeowners to develop deed-restricted, affordable units added to their homes, and to create a program for nonprofit developers to provide project management and technical assistance to these low-income homeowners.
- VI. Update the [Small Sites/Housing Preservation Program](#) based on recommendations from CCHO and the SF Anti-Displacement Coalition, and significantly increase investment in this program as an anti-displacement strategy.
  - A. Deployment of the Small Sites Program should take full advantage of the Community Opportunity to Purchase Act (COPA) that provides Qualified Nonprofits with

negotiating priority, and must be equitably distributed to address needs throughout the City.

- VII. Invest in staffing to strictly enforce the [Short Term Rental](#) and [Intermediate Length Occupancy](#) programs and provide a public registry of these units in order to limit, as much as possible, any conversions of housing to these corporate and commercial uses.

***Achieving these historically ambitious levels of affordable housing production will require investment in capacities and strategies that have never been made before.***

- VIII. Enforce the vacant homes tax, and encourage owners to make these homes available, or explore purchasing them with eminent domain if necessary.
- IX. Move forward with innovative recommendations of affordable and social housing models from the Housing Stability Fund Oversight Board (HSFOB).
  - A. This includes investment in new models of "social housing" which

voters approved, and which the HSFOB has been working to define.

- X. Use eminent domain to purchase unused single story commercial buildings to be re-built for 100% affordable housing and community serving businesses.
  - A. Especially for supportive housing for those who are currently homeless.
- XI. Purchase tourist hotels to be renovated and converted to studio housing units.
- XII. Purchase residential buildings with high vacancy for affordable housing stock. Use eminent domain if necessary in cases where vacancy is the result of units being held off the market.
- XIII. Reclaim former SRO buildings that were converted to 'tech dorms' or high end 'student housing' and are empty or no longer viable.
- XIV. Support Community Equity and Ownership in Housing Development
  - A. Commit to a meaningful expansion of community ownership through preservation housing acquisition which opens up opportunities for community control of land and housing, meaningful tenant protections and strong tenant participation.
  - B. Support nonprofit affordable housing developers including

community land trusts, tenant associations, housing cooperatives, community development corporations, etc.

- C. Support collective and limited equity types including homeownership, housing cooperatives, co-housing, etc.
- D. Expand support for the Community Opportunity to Purchase Act (COPA) to purchase existing apartment buildings through the Small Sites Program and to purchase new sites for 100% affordable housing development.

***Project reviews and approvals can take far less time than they do today while retaining democratic, public participation in the process.***

## **1E. State-Level Advocacy**

Two California State bills, SB828 and SB35 both passed in 2017, but their impacts are just now being understood broadly throughout California. SB828 is the bill that was supposed to fix the system for establishing the Regional Housing Needs Allocations (RHNA) across the State that was widely seen as being problematic. The result of SB828's new methodology for calculating RHNA was an explosion





of housing production goals across California. The companion measure, SB35 effectively allows developers who propose to build a project targeted at income levels for which a jurisdiction is under-producing, to bypass any public hearings or public input process. Since the housing production goals caused by SB828 are so extraordinarily high for every jurisdiction and at every income level, within the next couple of years, now that new RHNA goals are set, SB35 will kick in and every development proposal will be able to bypass public hearings and public review.

As if this situation wasn't bad enough, SB828 turns the RHNA housing production goals into mandates, and instead of providing resources from the State to local jurisdictions to help support the affordable housing mandates,

SB828 instead threatens to withhold transportation and affordable housing subsidies.

Withholding state funding for transportation and affordable housing as a bludgeon to force jurisdictions to reckon with obscenely inflated housing production "mandates" is not just bizarre public policy, but is disempowering to communities, especially those that have been advocating for racial, social and economic equity and housing justice while suffering from the impacts of market-rate housing for decades. Mandates for building housing should respond primarily to the needs of communities that are most vulnerable to displacement and suffering most from the high cost of housing.

Along with these mandates should



come significant new resources for affordable housing, and efficiencies at the State level like those recommended by the [State Auditor in their 2020 report](#), not the withholding of funding that could actually be used to provide the affordable housing that our communities desperately need. Both SB828 and SB35 must be significantly reformed either through amending legislation or through Statewide initiative.

***The result of SB828's new methodology for calculating RHNA was an explosion of housing production goals across California. Now that these new RHNA goals are set, SB35 will kick in and every development proposal will be able to bypass public hearings and public review.***

Recent passage of AB2011 in 2022 has caused significant concern, because it will incentivize and "streamline" market rate housing in areas of the City that have already been severely impacted by decades of escalating market rate housing development. Many of these areas have seen significant displacement

of low-income, American Indian, Black and other Communities of Color as a result of the concentration of market rate development. AB2011, unless amended, and unless local controls are put in place, will cause significant, further displacement of these vulnerable communities, and drive up land costs in these neighborhoods contributing to the cycle of gentrification. Further, AB2011 overrides existing neighborhood controls such as project conditions for approval intended to keep these communities stable, pushing market rate housing in many cases right back into the most vulnerable communities and away from upscale areas where building will be less profitable. Amendments to AB2011 are needed to protect small businesses from displacement by identifying buildings that have active small businesses currently or within the past 5 years as not being eligible for streamlining.

- I. Work with SF's two Assemblymembers to pass follow up legislation that amends AB2011 to mitigate the displacement and further harm it is poised to inflict on low-income communities and Communities of Color throughout San Francisco.
  - A. Advocate for new legislation that amends AB2011 to prevent the displacement of community serving businesses and working class jobs, ensure equity outcomes and neighborhood protection, and keep streamlined market-rate housing out of communities where it is

certain to have harmful impacts.

- II. Advocate for Ellis Act Eviction reform legislation at the State level to end the practice of LLCs purchasing buildings and using the Ellis Act or threat of the Ellis Act to clear the building to create speculative units.
- III. Advocate to repeal State Costa Hawkins legislation to avoid rent being increased when a unit is vacated.

***Many areas targeted by AB2011 have seen significant displacement of low-income, American Indian, Black and other Communities of Color as a result of the concentration of market rate development.***

- IV. Reform State Senate Bills SB35 (The Housing Accountability and Affordability Act) and SB828 (Fixing RHNA - Making Housing Assignments More Equitable)
  - A. Need to retain community input into development. As it stands, these two State Senate bills will combine to streamline all housing due to the fact that SF will not be

able to meet its RHNA mandates in any of the four income categories.

## **1F. Holistic Communities**

We don't just live in housing, we live in communities. Any set of policies for housing must include strategies for building whole, healthy communities. This has always been true, but the scale of the State RHNA mandates have the potential to change our built, urban environment faster than San Francisco has changed in any of our lifetimes. It is imperative that we meet this challenge by planning for communities that holistically support racial, social and economic equity.

- I. Any housing plan has to provide for other critical elements that make up a holistic, healthy, vibrant, diverse community.
  - A. Parks and open spaces that are accessible and allow for a range of community uses. So much of San Francisco's housing is small units, in buildings with little to no open space, so available, accessible open space is critical.
  - B. Locally owned businesses (including "production, distribution and repair" businesses) that provide affordable, culturally and linguistically responsive goods and services are also critical. These spaces, currently being rapidly replaced by market-rate housing, provide jobs and economic opportunities for residents, make residents feel welcome- like they are part of a

whole community, and provide the goods and services that residents need at prices they can afford.

- C. Public transit improvements that are focused on linking neighborhoods to each other rather than being so focused on downtown. Increasing transit to hospitals, SF State University, and the various City College campuses. Increasing late night transit service between neighborhoods.
- 1. These transit improvements must be prioritized based on the increased benefits they provide to underserved Communities of Color.

## 2. Funding

Strategies for sufficiently funding affordable housing should take into consideration that existing funding mechanisms severely constrain San Francisco's ability to creatively develop affordable housing utilizing a number of

diverse affordable housing strategies. Simplifying the funding structures for affordable housing ([refer to the State Auditor's report from 2020](#)) will result in much faster implementation, and much lower per unit costs. This partial list below demonstrates the need for active and consistent advocacy, leadership, and coordination across public agencies and legislative bodies.

***We don't just live in housing, we live in communities.***

For this Housing Element cycle, in order to achieve the affordable housing mandates, to support existing tenants to remain in stable, affordable, dignified housing, San Francisco will need at least \$4 Billion in annual capital subsidies from Local, Regional and State sources, especially sources of funding that do not currently exist.





# ***San Francisco will need at least \$4 Billion in annual capital subsidies from Local, Regional and State sources, especially sources of funding that do not currently exist.***

While this seems like an enormous sum, it's important to contextualize such a large amount. San Francisco's municipal budget is larger than \$12B, and California's \$235B budget maintains the 5th largest economy in the world. In addition to a re-prioritization of resources from these two large government entities, there is tremendous wealth in major San Francisco and Bay Area-based corporations that must be taxed. As of the end of September 2022, Alphabet had more than \$116B; Meta had more than \$40B; Apple had more than \$48B; Cisco had nearly \$20B in "cash on hand." This is just the cash on deposit and short term assets that can be liquidated immediately. And these are just a few of the corporations hoarding hundreds of billions of dollars that could be mobilized to guarantee stable, affordable, dignified housing for all, throughout the State of California.

It might be strategic to approach this significant funding expansion in phases.

For instance, if in the first year, there was \$1B to \$2B available, this could go a long way toward land banking development sites, and purchasing existing apartment buildings and SRO's. There could be increases in funding in future years to move the pipeline of new construction and rehabilitation forward, now that these critical properties are secured, while continuing to purchase additional sites to be land banked for the ongoing pipeline of development. In order to ramp up to bringing 46,000 new affordable units on line in eight years, it will take a massive increase in capacity to manage these projects, and a thorough plan for securing sites and moving each of those developments through the pipeline.

## **2A. Local**

- I. Expedite implementation of the SF Municipal Bank to make construction term and permanent funding available for 100% affordable housing development and Acquisition/ Rehabilitation projects. Municipal financing could be provided at far lower costs to projects, and therefore, provide a much greater efficiency of resources than the commercial sources of funding the City currently relies on.
- II. Require greater transparency through the City's budget and reporting process so there is full annual disclosure of every dollar that is restricted for affordable housing,



and its particular use restrictions; and every dollar that is unrestricted, and therefore, eligible to be spent on affordable housing. In terms of reporting, there should be an annual report of how much money was spent on affordable housing in the prior year and what that money was spent on.

III. Conduct an updated Residential Affordable Housing Nexus Analysis and, if there is a demonstrated increased need for affordable housing, increase the Inclusionary Affordable Housing Fee.

IV. Augment and allocate general obligation bonds, certificates of participation, housing trust fund,

general fund support, and allocate portion of city reserves, for critical affordability needs:

- A. Extremely Low-Income: Expand the Local Operating Subsidy Program, Senior Operating Subsidy, and create a Disability Operating Subsidy to cover more affordable housing and supportive housing options
  - 1. Including the Small Sites/Housing Preservation Program tenants for LOSP, SOS and DOS support.
  - 2. Create and expand options for tenants to have portable LOSP, SOS and DOS rental assistance.
  - 3. These rental subsidies must be accompanied by significant funding for building repairs,



especially for Small Sites Program buildings for the long term, so major capital repairs and replacements are not a financial burden borne by tenants.

- B. Explore progressive tax revenue measures, such as gross receipts tax, transfer tax, jobs-housing linkage fees, etc. and move these forward as each becomes viable.

## 2B. Regional

- I. Regional Bond for affordable housing through Bay Area Housing Finance Agency that must be coordinated effectively with both the State and City of San Francisco funding sources for affordable housing.

## 2C. State

- I. Partner with the State for new dedication of State resources
  - A. Refer to the [CA Auditor's report](#) that calls for real coordination of resources between State funding agencies, and between the State and Local jurisdictions, and more efficient use of capital subsidies.
  - B. Support further and ongoing investment in the [Community Anti-displacement and Preservation Program](#) and use of this program in San Francisco.
  - C. Foreclosure Intervention Housing Preservation Program (FIHPP)
  - D. State bonds and state general fund support

- E. Annual statewide allocations into the local Housing Accelerator Fund in order to finance land banking and 100% affordable housing development
- F. Need to identify a constant, reliable, major source of capital funding to be added to the equity raised through the Low Income Housing Tax Credit program. If developing affordable housing costs roughly \$900,000 per unit, and roughly 20% of those costs are financed and 80% are subsidized, this translates to \$720,000 per unit times 56,000 units which equals \$40,320,000,000 (\$40.32B). If we commit just to meeting the 46,000 units, this equals \$33.12B in subsidies over 8 years (\$4.14B per year).
  - 1. This will require a partnership between the State and the City to prioritize subsidies for affordable housing at the scale necessary to achieve these goals- and to simplify the way funding sources are layered for each individual project.
  - 2. By identifying new, major, sustained sources of capital funding, it will expand the range of eligible sites that can be developed as affordable housing because nonprofit affordable housing developers won't have the massive fixed costs associated with LIHTCs that need to be spread out over 90+ units.
  - 3. Simplifying the funding layering

and coordinating affordable housing objectives and priorities between the State and City would speed up the development process, and bring more affordable housing units online faster.

## 2D. Federal

- I. Federal
  - A. Advocate for expansion of public/social housing funding
  - B. Advocate for expansion of section 8 rental and homeownership subsidies

## 3. Capacity

Funding affordable housing and purchasing sites is not enough to meet the affordable housing goals. The City must increase communities' capacities to build and manage the new projects.

- I. Support expansion of nonprofit project management capacity, especially focused on areas of the city that haven't seen much affordable housing development.
  - A. Build capacity of American Indian, Black and other Communities of Color to lead on affordable housing development, especially in the



Western and Northern areas of the City where the Housing Element proposes that most of the new development occur, and where there currently is no community-based affordable housing developer.

- II. Support augmentation of the project management team at the Mayor's Office of Housing and Community Development to manage all the new funding for affordable housing, and to keep the high volume of new projects moving along expeditiously.
- III. Invest in a new permit review team at the Planning Department that focuses on reviewing and entitling 100% affordable housing.
- IV. 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.

- V. Commit to a broad education and outreach program that is culturally and linguistically accessible, about affordable housing especially to parts of the city that haven't seen much affordable housing development.
  - A. Allow developers to do community outreach when they are responding to a Notice of Funding Availability (NOFA).
- VI. Support the creation and expansion of culturally and linguistically competent neighborhood based organizations to acquire and manage residential properties
- VII. Support neighborhood efforts to create and implement community plans and strategies that address affordable housing needs.





# Community Plans

## Finalized and Adopted Community Plans

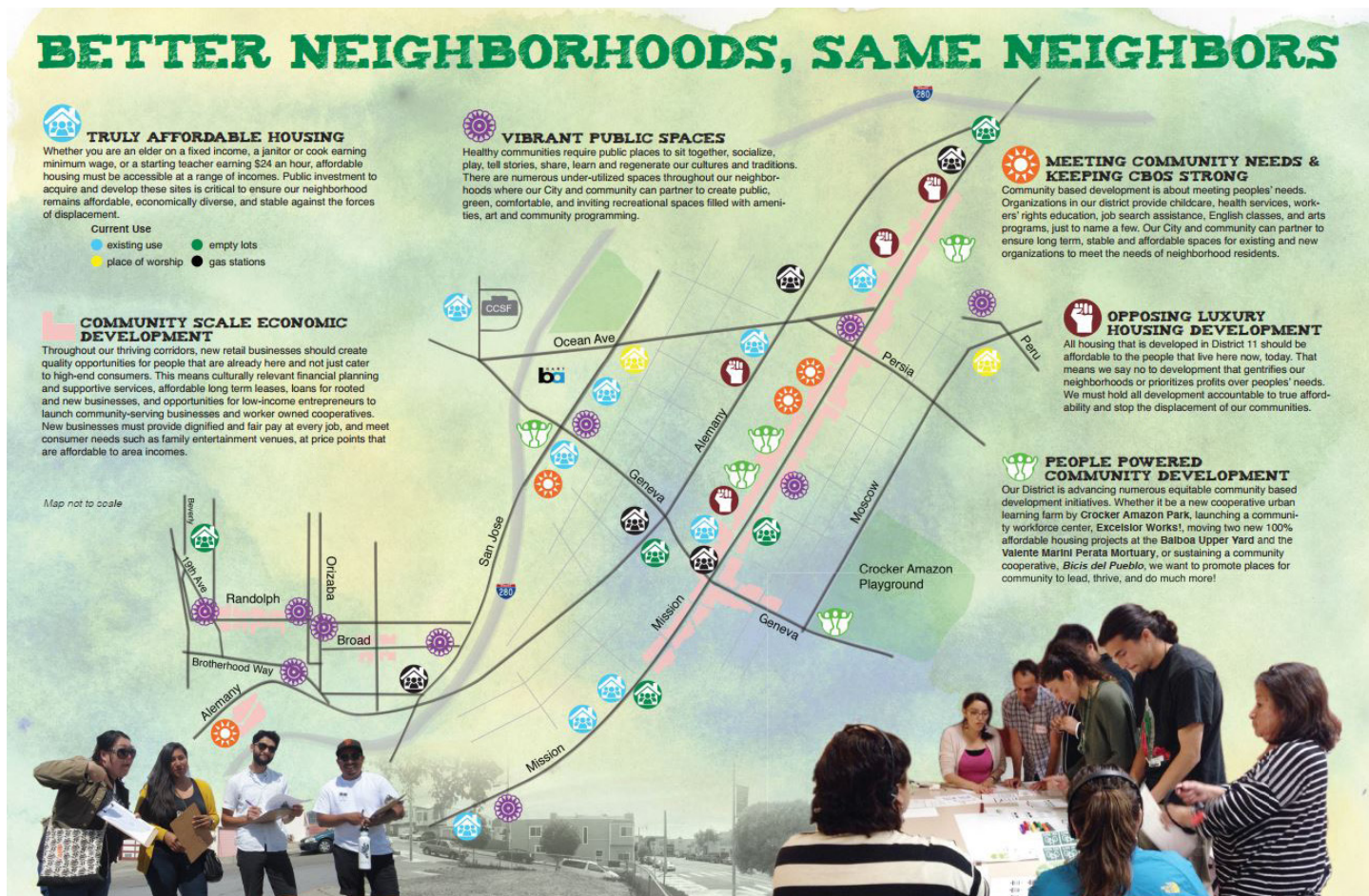
- Chinatown Community Plan, 1985
- SOMA, SOMCAN, Reclaiming Our Space (ROSe), 2022
- SOMA, SOMA Pilipinas, CHHESS Report, 2022
- Tenderloin, Tenderloin People's Congress, Tenderloin Vision 2020
- Mission, Mission Area Plan, MAP2020
- Excelsior, PODER, Better Neighborhoods Same Neighbors, 2015

## **Plans Still Pending Completion and/or Approval**

- Sunset, Sunset Forward, 2022
- SOMA, SOMA Youth and Family Special Use District, 2022 update
- Mission, Calle24, CHHESS Report
- Mission, American Indian Cultural District, CHHESS Report
- Bayview, SF African American Arts & Cultural District, CHHESS Report

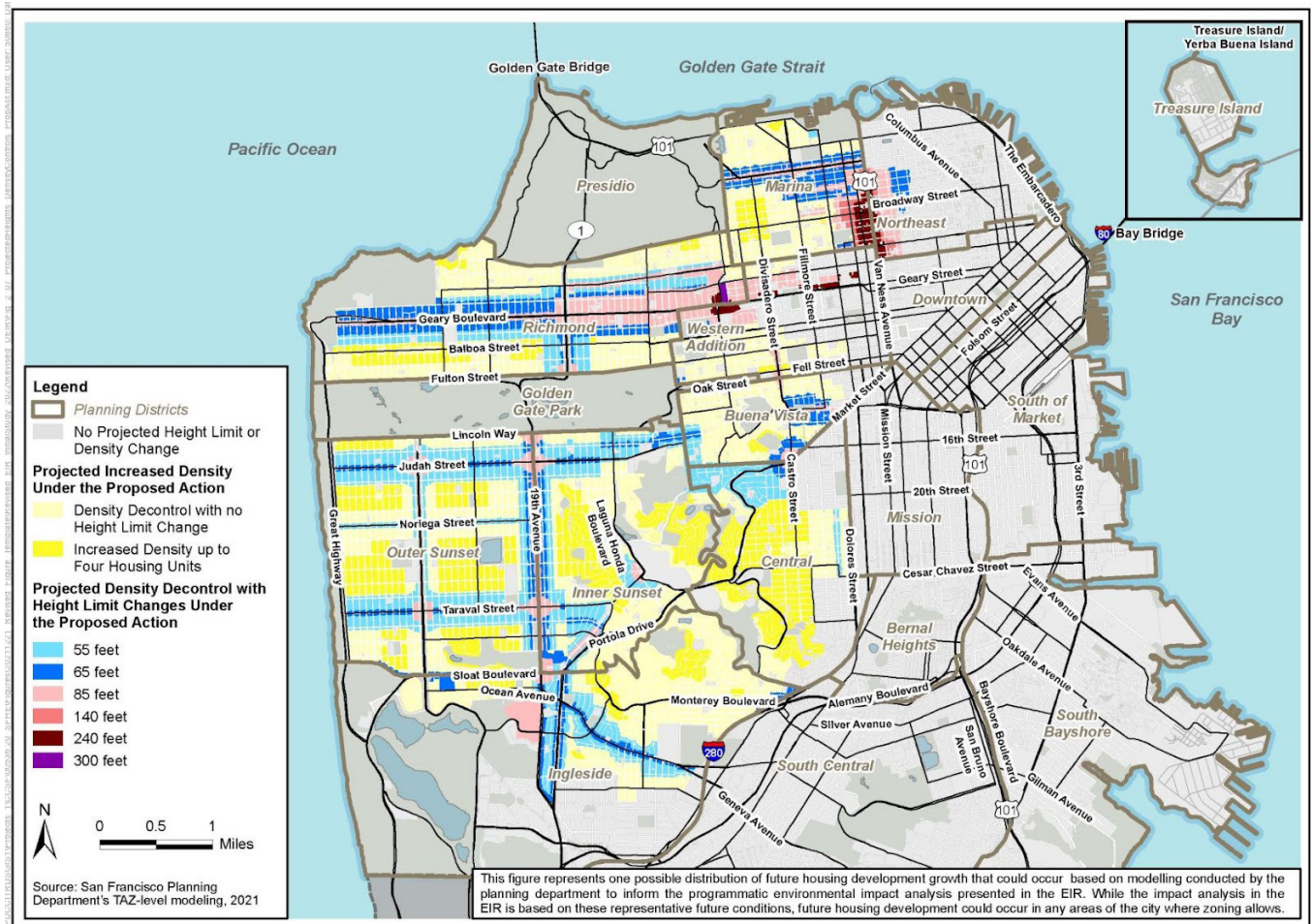


# Better Neighborhoods, Same Neighbors (CUHJ)



Community Plan for the Excelsior: Communities United for Health and Justice (CUHJ)

# Figure 1



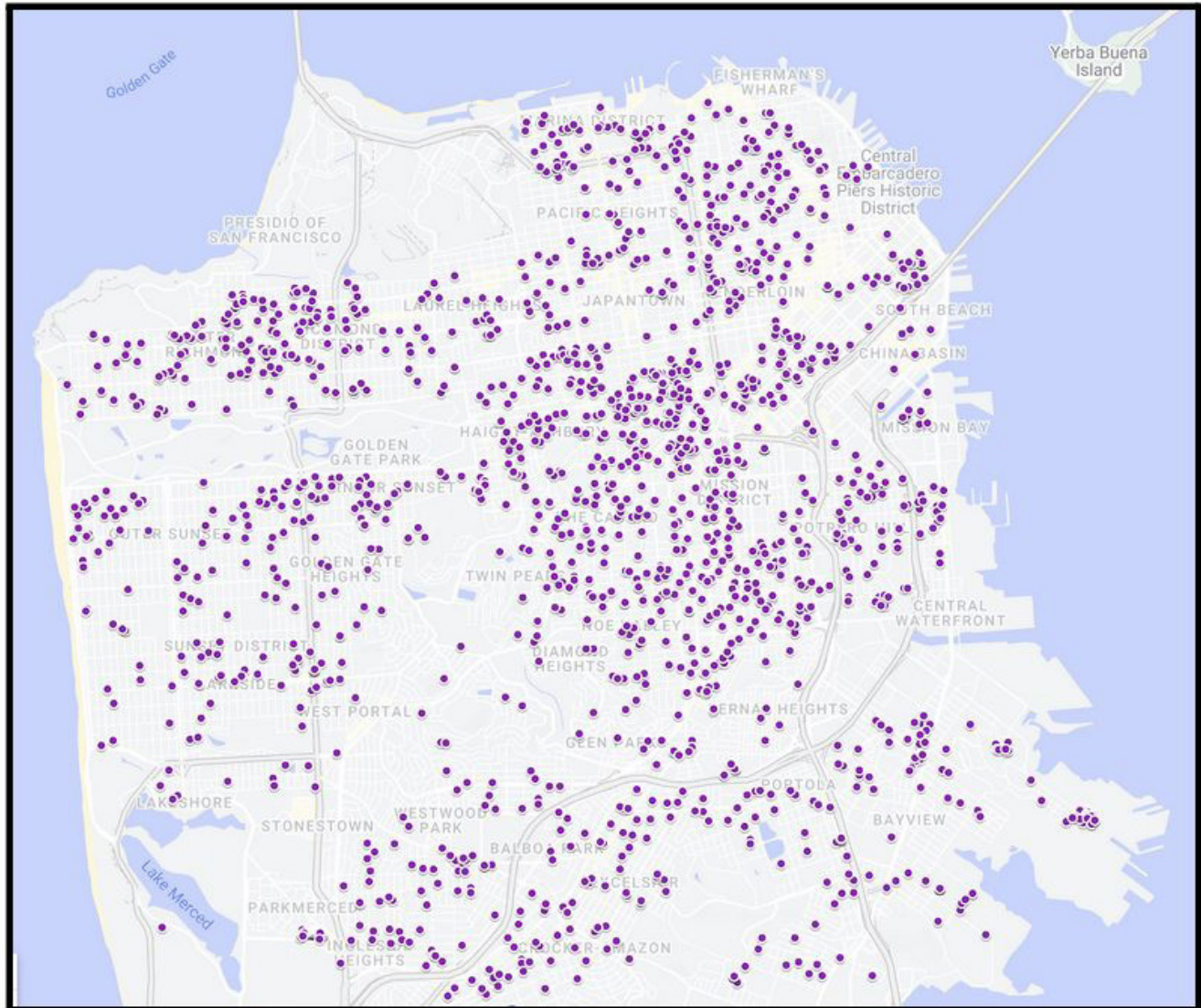
San Francisco Housing Element 2022 Update  
Case No. 2019-016230ENV

**Figure 2-7**  
**Projected Heights and Density Controls Under the Proposed Action**

*Figure 1: Proposed Heights and Density Controls Under Housing Element 2022*



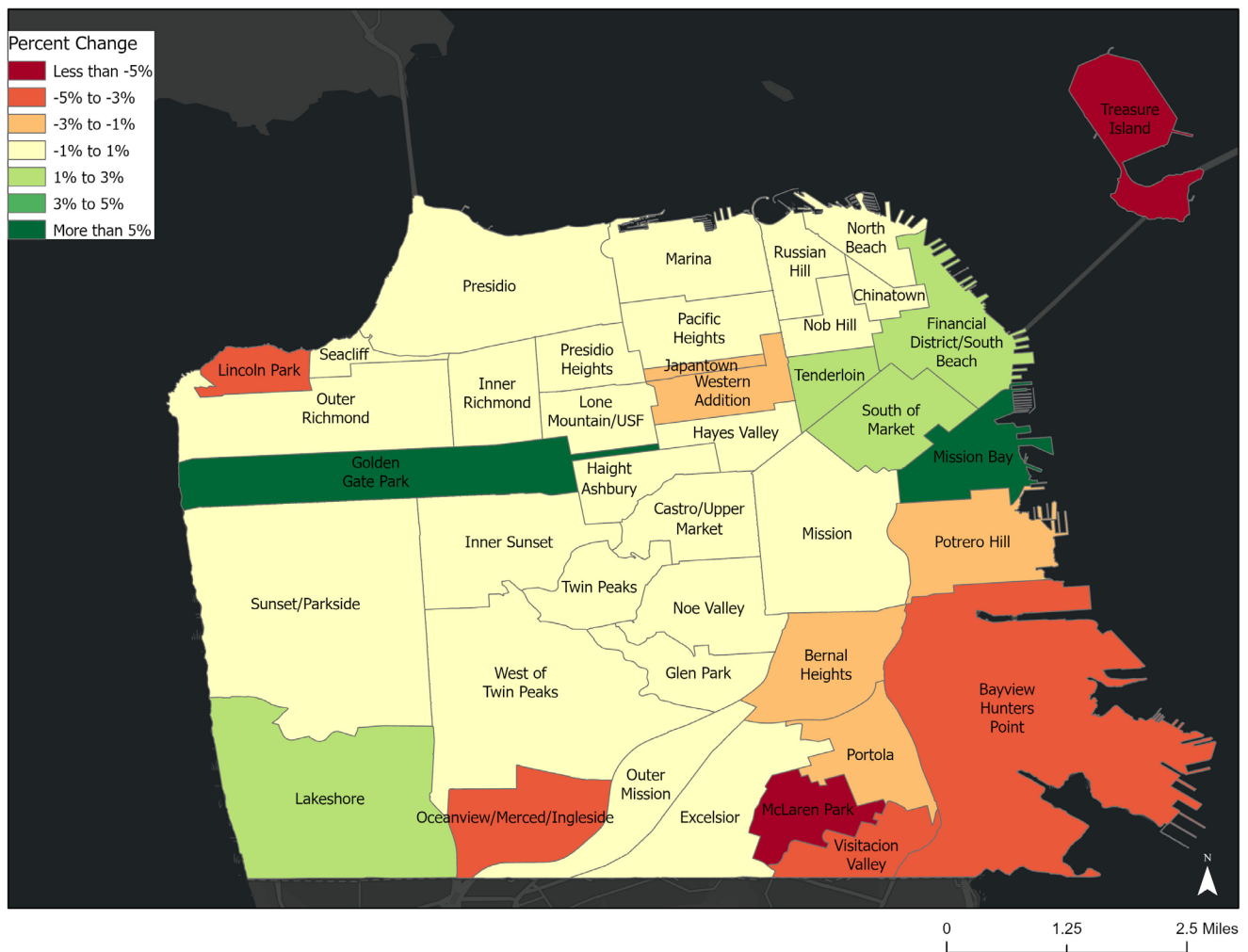
Figure 2



*Figure 2: Map of Multi-Family Buildings Placed in Service during the 2014 - 2022 Housing Element cycle. Data source: SF Planning Department*

# Figure 3

## Percent Change in Black/African American Residents By Neighborhood (2010-2020)

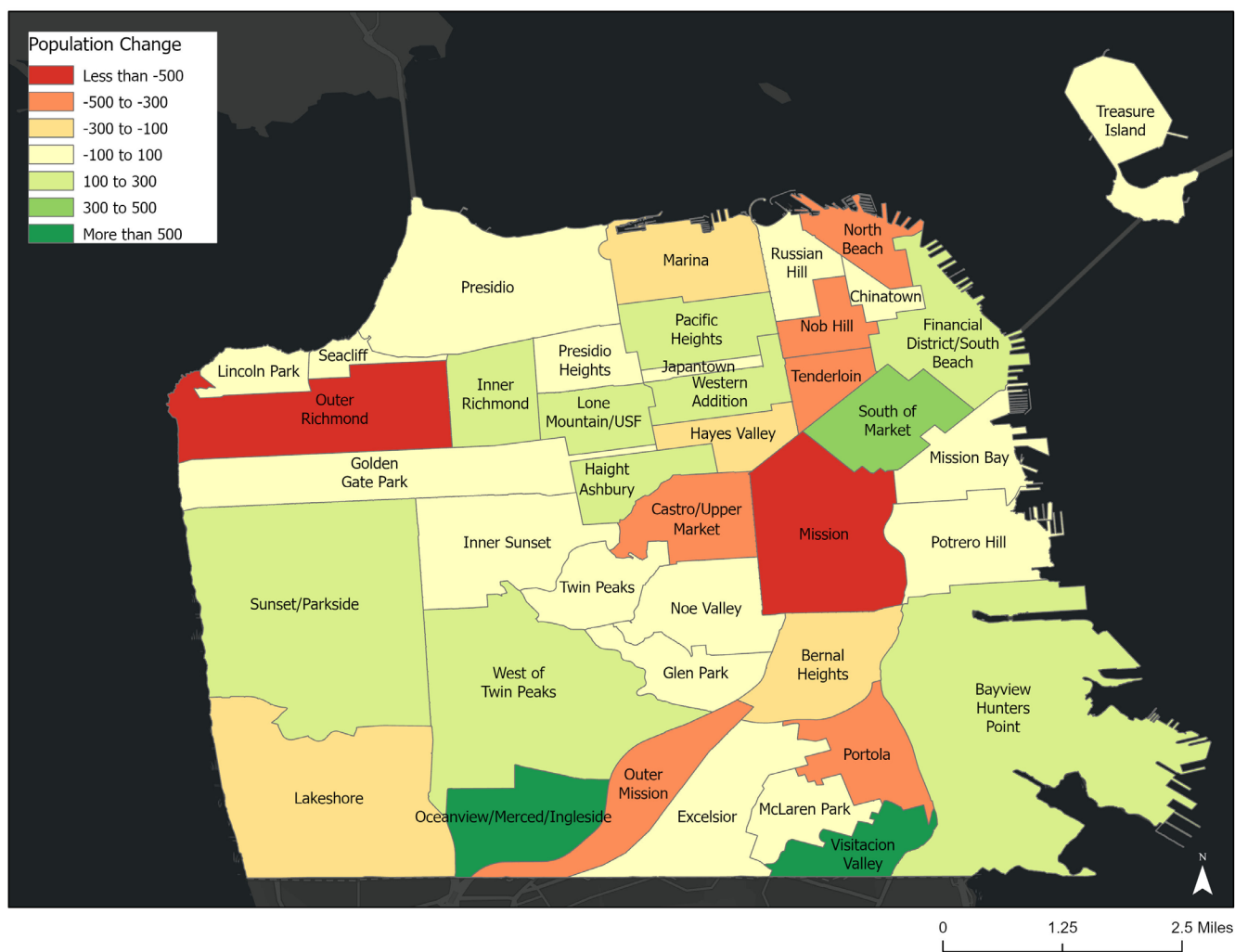


*Figure 3: Percent Change in Black/African-American Residents By Neighborhood (2010 - 2020). Data source: US Census*



Figure 4

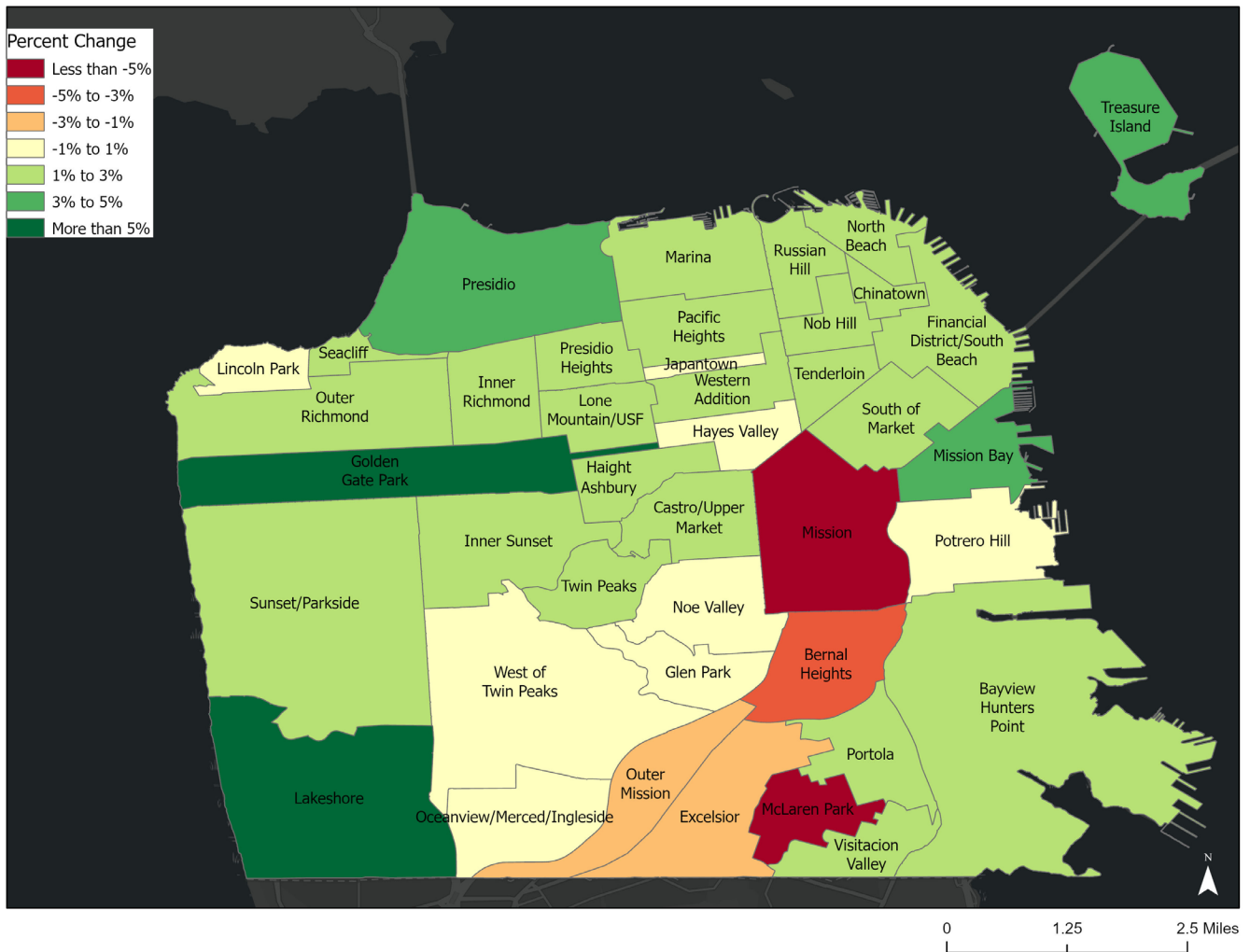
Estimated Change in Number of Filipino Residents By Neighborhood (2015-2020)



*Figure 4: Estimated Change in Number of Filipino Residents By Neighborhood (2015 - 2020). Data Source: US Census*

# Figure 5

Change In Percent of Hispanic/Latino Residents As Share of Total Neighborhood Population (2010-2020)



*Figure 5: Change in Percent of Hispanic/Latino Residents As Share of Total Neighborhood Population (2010 - 2020). Data Source: US Census*