



April 30, 2025

Supervisor Stephen Sherrill  
San Francisco Board of Supervisors  
1 Dr. Carlton B. Goodlett Place  
San Francisco, CA 94102

**Re: Proposed Revisions to the Upzoning Map to Reflect District 2's Community Planning, Safety, and Growth Objectives**

Dear Supervisor Sherrill,

Thank you for your engagement with our neighborhood as we collectively work toward a vision of housing growth that respects San Francisco's history, diverse communities, scale, and distinctive public spaces.

As SF Planning continues to revise the proposed Upzoning Map, we request a series of specific, actionable changes critical to maintaining the identity, livability, and uniqueness of this part of San Francisco. We look forward to working with you to:

- Maintain Lombard Street as a Scenic Gateway to San Francisco
- Protect Existing Housing and Prioritize Safety
- Safeguard Neighborhood-Serving Retail Corridors
- Remove Density Decontrol Provisions

This part of District 2 features some of San Francisco's most iconic landmarks—from the Bay and the Palace of Fine Arts to the Golden Gate Bridge. As drivers enter the city via the Presidio Parkway, they experience a rare blend of hillside housing and urban density, evoking the charm of Europe's great coastal cities. The combination of natural setting, architectural rhythm, and cultural legacy makes this area both a world-class tourist destination and a cherished residential neighborhood.

For over a century, development west of Van Ness has followed the city's natural topography, integrating the urban grid with the land's slope, sunlight, and airflow. This is no accident—it is the result of organic, community-guided planning. Taller buildings crown the hilltops, gradually stepping down to 40 feet as the land slopes toward the Bay. Where this balance has been ignored, the consequences have been damaging.



As the city updates its zoning map to meet housing goals, it has both the opportunity and the obligation to respect this historic, context-sensitive development pattern. A one-size-fits-all approach invites speculative land grabs, drives up land costs, and risks replacing community-serving homes and businesses with unaffordable, investor-driven development.

## **Requested Map Changes & Policy Adjustments**

### **1. Maintain Lombard Street as a Scenic Gateway to San Francisco**

Lombard Street forms a gateway into San Francisco from the Golden Gate Bridge, framing iconic landmarks like the Palace of Fine Arts. Longstanding planning principles recognize that such landmarks must retain their visual prominence within the surrounding cityscape.

The proposed Upzoning Map undermines those principles by allowing buildings 6 to 8 stories tall—or more—immediately adjacent to or within the vicinity of lower-scale blocks and historic landmarks. These oversized structures, up to 100% larger than their surroundings, would crowd and compete with iconic features like the Palace of Fine Arts—a City Landmark that has long defined San Francisco’s northern waterfront. Its visual stature depends on a built environment that respects both scale and setting. A blunt, uniform upzoning to 85 feet disregards topography and erodes the historic character that makes this area both livable and globally recognized.

We recommend a tapered height approach: 40 feet near the Palace, rising gradually to 50 and then 65 feet approaching Van Ness. This reflects the area’s historical development pattern and ensures a balanced transition from the waterfront to the city’s interior.

#### **Recommended Height Limits:**

- Limit building height to 40’ on Richardson Avenue and on Lombard Street (starting at the Lombard Gate) to Webster Street
- Allow gradual increases beyond Webster to Van Ness:
  - 50’ between Webster and Gough
  - 65’ between Gough and Van Ness

This part of San Francisco — including Cow Hollow, the Marina, and Pacific Heights — has been assigned thousands of new units of housing capacity through broad density decontrol and increased height allowances, all contributing to the state’s RHNA targets. It is more than our fair share in one of the city’s most densely populated neighborhoods. These policies, when done properly, could enable new growth by allowing duplexes, triplexes, and small multi-unit buildings across the neighborhood.



In addition, Lombard is home to many small, independent motels dating back to the era of the Golden Gate Bridge — a rare remnant of San Francisco's history of welcoming visitors within neighborhood settings. Lombard is one of the last Motorways in the country that captures that hope-filled era of travel in mid-century America, rebuilding after World War II. These motels provide reasonably priced rooms and proximity to a major tourist destination, and support for our local businesses. Several of these motels have already been converted to student housing for the Academy of Art University. Losing others will result in losing tourism to our community and neighborhoods.

These recommendations align with the Planning Department's stated goals under the General Plan to preserve neighborhood character, maintain economic diversity, and enhance citywide view corridors.

## **2. Protect Existing Housing and Prioritize Safety**

Lombard Street already has many residents living in rent-controlled apartments. These homes are essential to neighborhood stability and affordability, and support a vibrant mix of retail, services, and housing. Let's ensure long-time tenants in older rent-controlled buildings will not be quietly displaced through buyouts and demolitions.

As the upzoning plans allowed for more residents, we need to ensure the safety of those residents. The Planning Department must consider the serious risk of liquefaction in these areas. Much of the low-lying Marina and Cow Hollow was built on infill and remains vulnerable to seismic activity.

Aside from Lombard being a liquefaction zone, fire response time is a consideration. Cow Hollow boasts a newly rebuilt fire station on Greenwich Street. However, the fire truck ladders at this station can only service buildings as tall as 6-7 stories. If the building heights nearby are raised to 85' or taller, trucks must come from other neighborhoods, increasing the response time and endangering residents and visitors. This public safety issue has not been addressed anywhere in the city where buildings are proposed for drastic height increases.

These issues point to the need for thoughtful major corridor plans along not only Lombard, but Geary, 19th, and Taraval, among others, to ensure that urban planning practices can be implemented with the public input and care that went into the Market-Octavia or Central SOMA Plans of recent years.

## **3. Safeguard Neighborhood-Serving Retail Corridors**

Chestnut, Union, and Fillmore streets are economic and cultural anchors. Their small-scale, sunlit retail corridors support thousands of jobs and contribute significantly to neighborhood livability and a large contingent of the city's 20+ million visitors that further contribute to supporting local employment and small businesses.



Upzoning these corridors would trigger redevelopment that almost always begins with demolition—many of these buildings are historic one-story Art Deco structures that currently house thriving small businesses. These businesses will not survive the transition, and adjacent shops are often dragged down by years of construction-related disruption. Noise, fencing, blocked sidewalks, lost parking, and reduced foot traffic can destabilize entire commercial blocks. The result is not affordable housing—it is the slow erosion of the vitality and street life that make these neighborhoods work.

The Marina Safeway site is another concern. While redevelopment may be considered, its location and current use are vital for residents—especially seniors and families without access to private transportation. A high-rise would be inappropriate and disruptive in this context.

#### **Recommended Height Limits:**

- Limit height to 40 feet on:
  - Union Street
  - Chestnut Street
  - Lower Fillmore Street (within the Marina and Cow Hollow)
  - Upper Fillmore Street (from Jackson to Bush)
  - Safeway site (corner of Laguna and Marina Blvd)

#### **4. Remove Density Decontrol Provisions**

To promote transparency and encourage meaningful neighborhood engagement, urge SF Planning to update the current interactive Upzoning Map to clearly reflect the two key provisions. Most San Franciscans are unfamiliar with these kinds of online tools and may not realize they need to click the “Info” button in the left-hand legend to uncover the proposed changes.

Currently, if someone clicks on a corner lot within the density decontrol area, the map still shows a proposed height of 40 feet—rather than the actual 65 feet being contemplated. This creates confusion and obscures the true scope of the changes. Failure to make these provisions plainly visible may not meet the standards of procedural transparency or informed public review expected under CEQA and other land use statutes. Complete clarity is essential.

But clarity alone is not enough. These provisions are deeply flawed and should be removed:

#### **Recommended Changes:**



- **Remove the provision that allows 65' heights on corners lots.** This will result in taller, randomly-placed towers among otherwise consistent 1-4 story residential blocks — with no relationship to neighborhood form or any broader planning vision.
- **Remove the provision that allows lots 8,000 sq. ft. or greater to automatically rise to 65'.** This provision encourages lot mergers that will invade the unique and vital greenbelts, backyards, and trees that provide vital open space in dense urban living.

## Conclusion

We support new housing through thoughtful, context-sensitive growth. Like the city, we believe in expanding housing opportunities through planning that respects topography, preserves neighborhood identity, and safeguards essential services.

This area has already added housing capacity through the 4- and 6-plex legislation led by Supervisor Mandelman and adopted in 2023. We welcome further improvements that recognize Lombard Street's role as a scenic gateway.

But the current map goes too far. It invites speculation, drives up land costs, and encourages the demolition of sound housing—quietly displacing tenants and small businesses in favor of unaffordable luxury towers. These are the very people and places that give our neighborhoods their life and character.

Incorporating the revisions we've outlined will build public trust, reflect sound planning, and reduce the risk of unnecessary conflict or delay.

We urge you to support a smarter, long-term strategy—one that protects what makes San Francisco unique: its layered history, diverse communities, small businesses, and walkable, human-scale neighborhoods that reflect generations of thoughtful planning—while ensuring that truly affordable housing is the outcome, not just the promise, of these efforts.

Sincerely,

Lori Brooke  
President, Cow Hollow Association

cc:  
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