



June 25, 2026

The Honorable Daniel Lurie
Mayor, City and County of San Francisco
City Hall, Room 200
1 Dr. Carlton B. Goodlett Place
San Francisco, CA 94102

Sarah Dennis Phillips, Director
San Francisco Planning Department
49 South Van Ness Avenue, Suite 1400
San Francisco, CA 94103

Re: Determination of 11–15 Marina Boulevard's Eligibility for Ministerial Approval Under AB 2011

Dear Mayor Lurie and Director Phillips:

The Golden Gate National Parks Conservancy and Fort Mason Center for Arts & Culture join Supervisor Sherrill in respectfully requesting that the City and County of San Francisco (the City) determine that the proposed residential development at 11–15 Marina Boulevard is not eligible for ministerial approval under Assembly Bill 2011 (AB 2011). Together, our organizations partner with the National Park Service to steward portions of Fort Mason, a 55-acre national park landscape within the Golden Gate National Recreation Area (GGNRA) that serves millions of visitors annually.

Our request concerns the project's eligibility under AB 2011, not the appropriateness of housing at this location. We recognize San Francisco's urgent need for additional housing and believe that 11–15 Marina Boulevard is suitable for residential development. However, because the project site does not satisfy AB 2011's perimeter-adjacency requirement, it should proceed through the City's standard discretionary review process, which allows consideration of potential impacts on adjacent public resources.

The proposed development would rise 25 stories and nearly 300 feet along one of San Francisco's most prominent waterfront corridors—and immediately across the street from Fort Mason and the Great Meadow. If deemed eligible for ministerial approval under



AB 2011, the City would be precluded from evaluating and, where appropriate, mitigating potential impacts on adjacent parklands, public views, transportation access, and other other environmental values. Requiring discretionary review would not impede housing development on the site; rather, it would ensure that the project is thoughtfully integrated into its uniquely significant surroundings.

A. The project site does not satisfy AB 2011's 75 percent perimeter-adjacency requirement

To qualify for streamlined ministerial approval under AB 2011, at least 75 percent of a project's perimeter must adjoin "parcels" developed with "urban uses." (Gov. Code §65912.121(e).) "Urban uses" include residential, commercial, public institutional, transit, parking, retail, and public park uses, provided the park itself is "surrounded by other urban uses." (Gov. Code §65912.101(t).)

Notably, the Planning Department's Notice of Conditional Eligibility (April 10, 2026) does not analyze whether 11–15 Marina Boulevard satisfies AB 2011's perimeter-adjacency requirement, and its AB 2011 Environmental Site Criteria Memo (January 5, 2026) checklist omits it entirely. By contrast, other jurisdictions, including Los Angeles, expressly evaluate perimeter adjacency as part of their AB 2011 eligibility review.

The project site does not meet this statutory threshold. Approximately half of the site's perimeter adjoins Fort Mason and the San Francisco Marina Yacht Harbor (Yacht Harbor). Fort Mason is a national park bordered on three sides by San Francisco Bay and public open space. Yacht Harbor is owned by the San Francisco Recreation and Park Department and is dedicated under the Public Trust to maritime, recreational, water-access, and related supporting uses (e.g., parking). Even if Yacht Harbor were characterized as a public park, it would not qualify as an "urban use" because it is not "surrounded by other urban uses," as required by AB 2011.

Because so much of the site's perimeter adjoins parkland and recreational waterfront uses that do not meet the statutory definition of "urban uses," the project is not eligible for streamlined, ministerial approval under AB 2011.



B. The project site is adjacent to one of San Francisco's most significant public waterfront landscapes

The AB 2011 eligibility determination is particularly important because 11–15 Marina Boulevard sits immediately adjacent to an interconnected system of nationally significant public lands. Fort Mason occupies a central position within a continuous chain of open space extending from Aquatic Park through Fort Mason, Marina Green, Crissy Field, and the Presidio. Visitors experience this landscape as an uninterrupted sequence of parks, shoreline trails, historic sites, and open-water views rather than as an urbanized corridor.

Upper Fort Mason houses the headquarters of the Golden Gate National Recreation Area and the Golden Gate National Parks Conservancy. Lower Fort Mason is home to Fort Mason Center for Arts & Culture, the nonprofit steward of the San Francisco Port of Embarkation National Historic Landmark District, which welcomes more than 1.5 million visitors annually.

The broader GGNRA received approximately 16.8 million visitors in 2025, making it one of the most visited national park units in the United States. Fort Mason serves both as a gateway to these public lands and as a destination in its own right, offering sweeping vistas of the Golden Gate Bridge, Alcatraz, San Francisco Bay, the Palace of Fine Arts, and the Marin Headlands. These iconic views can be experienced from the Great Meadow, shoreline trails, historic piers, gardens, and hillside pathways that link Fort Mason to the surrounding waterfront.

The Great Meadow is one of the most heavily used public open spaces on the northern waterfront—a broad, sloping lawn framed by historic buildings, mature trees, open skies, and expansive Bay scenery. It serves as a gathering place for residents and visitors, supporting daily activities such as walking, jogging, cycling, picnicking, and informal recreation. The meadow and adjacent open spaces also support diverse urban wildlife, including raptors, owls, songbirds, and marine mammals that rely on the Bay's interconnected network of parks and natural areas.

Fort Mason is also a place of substantial historical and cultural significance. From its Indigenous history and role in the aftermath of the 1906 earthquake to its service as the San Francisco Port of Embarkation during World War II and the Korean War, the site reflects multiple chapters of the region's history. Today, its historic buildings have been adaptively reused for arts organizations, theaters, educational programs, nonprofit offices, event venues, housing, and public gathering spaces while preserving the character of this nationally significant landscape.



Given both the project's failure to satisfy AB 2011's perimeter-adjacency requirement and the extraordinary public significance of the adjacent parklands, we respectfully urge the City to determine that the project is not eligible for ministerial approval under AB 2011 and should instead proceed through the standard discretionary review process established by local zoning and planning policies.

Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read "Christine Lehnertz", is positioned above the printed name.

Christine Lehnertz
President & CEO
Golden Gate National Parks Conservancy

A handwritten signature in blue ink, appearing to read "Mike Buhler", is positioned above the printed name.

Mike Buhler
President & CEO
Fort Mason Center for Arts & Culture

cc: Supervisor Stephen Sherrill
Ned Segal, Chief of Housing and Economic Development
David Chiu, City Attorney
Superintendent David Smith, GGNRA
Erin Roach, President, Marina Community Association
Amy Meyer & Cynthia Gissler, People for the Parks/Presidio