

Member, Board of  
Supervisors District 2



City and County of San  
Francisco

## STEPHEN SHERRILL

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

Director Gustavo Velasquez  
California Department of Housing and Community Development  
651 Bannan Street  
Sacramento, CA 95811

### **RE: Questions regarding 11-15 Marina Blvd Environmental Impacts**

Dear Director Dennis Phillips and Director Velasquez,

In December 2025, project developer Align Real Estate submitted preliminary plans for a 25-story, mixed-use development at the site of the Marina Safeway, located at 11-15 Marina Boulevard. As the San Francisco County Supervisor for this site, I am writing to seek greater clarity and transparency regarding the proposed redevelopment of the Marina Safeway site. Specifically, I would appreciate more information about (a) **what is allowable in the “base project;”** (b) **does state law allow a base project with only residential units to be converted into a mixed-use project;** (c) **does this proposed development merit qualification for [Assembly Bill 2011](#)’s environmental review exemptions given unique, substantive environmental concerns;** and (d) if this project does qualify for environmental review exemptions, **what analysis and remediation of said environmental impacts does the project need to undergo to ensure neighborhood safety.**

This project’s magnitude is unique and first-of-its-kind in this neighborhood. As such, it is imperative that the public is explicitly assured that this project’s environmental impacts are being addressed. Transparency is especially critical where technical determinations will have long-term, tangible implications for the City and County of San Francisco (the “City”).

Furthermore, this proposal raises important questions about the boundaries between the City’s planning authority and state-mandated housing laws, including the application of [Assembly Bill 2011 \(AB 2011\)](#) and related density bonus provisions. As recent state frameworks increasingly

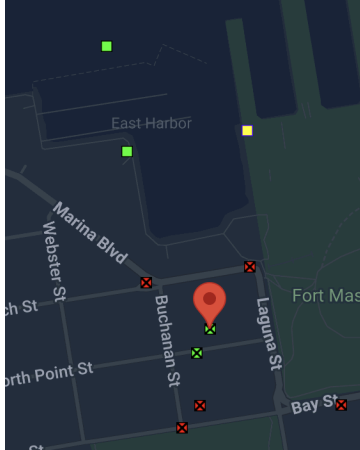
define development outcomes, it is essential for the City to clearly articulate where the City may require appropriate safety standards and/or public infrastructure investments – and where state law may constrain or preempt that authority. Without this clarity, it is difficult for the public to understand how decisions are made, how concerns are being meaningfully addressed, and how the project’s approval process is regulated.

First and foremost, I would appreciate **a clear explanation as to why and how this project qualifies for AB 2011’s streamlining of environmental review.** Specifically, AB 2011 requires that projects subject to a streamlined, ministerial review process be required to have “[A]t least 75 percent of the perimeter of the site adjoins parcels that are developed with urban uses.” (CA Government Code § 65912.111). Specifically, how is the 75% threshold being calculated in this case, including the classification of adjacent properties such as Fort Mason and the City Rec and Park–owned waterfront parcels (including the Marina Green and surrounding areas)?

Additionally, can the Department clarify how it determines whether these parklands qualify as an “urban use,” particularly in instances where such parkland may not itself be surrounded by other urban uses?

Furthermore, should this project be eligible for AB 2011’s ministerial review process, please provide a response to the following questions surrounding the Marina Safeway project’s environmental impacts:

- **Soil Contamination:** We would appreciate further clarification on how the 11–15 Marina Blvd. site qualifies for AB 2011 streamlining. Residents in the neighborhood have highlighted that this parcel is **not** on the Cortese List, [despite the adjacent properties having documented connections to North Beach Manufactured Gas Plant \(MGP\) residues](#) (shown with red dots in the image below). Can you please detail the extent of subsurface investigation conducted **on this parcel** to date? Specifically, can the Department provide additional detail on how the current and proposed sampling plans sufficiently identify any hazardous conditions beneath the existing Safeway footprint, and how potential risks to public health are being evaluated and mitigated?



- **Liquefaction & Soil Conditions:** We would welcome additional insight into how the project is being evaluated with regard to liquefaction risk during an earthquake – especially when this risk is compounded by the potential of contaminated soil. Can you please explain how AB 2011’s objective standards framework takes into consideration the projects where geotechnical and environmental risks intersect? In particular, how are these overlapping conditions assessed to ensure that site-specific risks are fully addressed? Lastly, does AB 2011’s objective standards framework make any considerations for the increased seismic risks that result from construction on top of Liquefaction Zones?
- **Shadows on Public Parks:** Given the project’s proximity to surrounding open spaces, including the Great Meadow at Upper Fort Mason (a national park), we would appreciate further information on the need to study potential shadow impacts. Could the Department clarify whether a shadow analysis has been conducted or is planned, and how impacts on adjacent parkland – especially a cherished national park area – are being considered in the review process?
- **Flood Risk & Infrastructure:** The Marina Safeway parcel is located on the San Francisco Public Utilities Commission’s [100-year flood map](#), which shows parcels that are “highly likely to experience deep and contiguous flooding.” How does AB 2011’s objective standards assess flood risk and infrastructure capacity for this site, and what mitigation measures are placed through this environmental assessment to ensure neighborhood safety? Additionally, how is the potential impact of new residential density on existing sewer and stormwater systems being incorporated into the project’s review?

Finally, I would appreciate clarity as to the methodology used to establish the “base project” and how state density bonuses are allowed to change the complexion of this project, specifically with regard to bedroom-mixes and to be modified into a mixed-use project. In particular:

- **Base project and Intersection with State Density Bonuses:** What procedures are used to determine the maximum allowable development envelope under existing zoning controls prior to applying State Density Bonus Law (SDBL) incentives? To what extent are non-residential uses, required unit mix provisions, and other planning code requirements incorporated into the base density calculation?
  - Specifically, the base density listed on the project's [Individually Requested State Density Supplemental](#) is 567 units, which assumes a complete build-out of existing parcel area (113,435 sq. ft) to the four-story height limit under the City's existing zoning at the time of submission. Could a base project at this site build 100% of a parcel area at this site under the City's existing Planning Code *before triggering state density bonus law*?
  - Given that the base project assumes a full residential build out of 100% parcel area to the four stories, the base project does **not** account for *the ground-floor commercial use*. Does state density bonus allow for a change from a fully residential base project to a mixed-use project with the ground-floor retail added only after the project sponsors applied for state density bonuses?

San Francisco *must* build new housing. To do so, our Board of Supervisors passed the Family Zoning plan – a thoughtful, meticulous proposal that expanded opportunities to accommodate that needed housing throughout the city. I am proud to have supported that plan. However, the proposed Marina Safeway development was submitted at the eleventh hour, taking advantage of old zoning designations that were soon to be changed under the soon-to-be-enacted Family Zoning plan. As a result, this proposal has perpetuated a feeling of unpredictability in our city's planning process and has deteriorated trust in the City's ability to sensibly deliver needed housing. I hope to use your response to this letter as a way to address residents' confusion and provide clear, concise, and correct information about this proposal.

Thank you for your leadership and commitment to transparency with San Franciscans regarding this project.

Sincerely,



Stephen Sherrill  
District 2 Supervisor  
City and County of San Francisco