

December 10, 2024

Rich Hillis, Director of Planning  
San Francisco Planning Department  
49 South Van Ness Ave., Suite 1400  
San Francisco, CA 94103  
rich.hillis@sfgov.org

*Distributed via email*

RE: Upzoning and San Francisco Neighborhoods

Dear Director Hillis:

On behalf of Neighborhoods United SF (NUSF), we write to request comprehensive and specific changes to the proposed Upzoning Map posted on the City of San Francisco Planning Department website dated February 2024.

NUSF is a growing coalition of long-established neighborhood groups, civic organizations and merchant associations across San Francisco deeply concerned about the proposed height and density increases in our neighborhoods. We partner with communities and neighborhoods throughout San Francisco to promote equitable growth, protect valuable resources, provide for public input, and prevent residential tenant and small business displacement, including those protected by rent control and participation in the Legacy Business Program.

### State Housing Mandate

We recognize the challenges you face in balancing state mandates with the responsibility to preserve San Francisco's unique neighborhoods and address genuine housing needs. However, the current approach to upzoning, driven by outdated data and state-imposed targets, risks undermining these efforts.

Since 2020, the city's population has dropped by 65,000, rents have fallen, and vacancy rates have risen—clear indicators that the urgency fueling these mandates is misplaced. Moreover, the California Department of Finance projects only a modest population increase for the Bay Area over the next eight years, far lower than the growth assumptions embedded in the current RHNA targets. Despite this, Sacramento's top-down approach demands developments that will primarily serve luxury markets rather than providing genuinely affordable housing. San Francisco already has 74,000

units in its housing pipeline—exceeding revised projections for what the city actually needs. Instead of delivering truly affordable housing, these mandates fuel high-density, market-rate developments that benefit luxury developers while displacing renters and small businesses. Further, the city has implemented upzoning of all single-family parcels and corner parcels, significantly increasing housing capacity without addressing the fundamental flaws in state mandates or the speculative pressures driving gentrification.

To address these challenges, we urge city leaders to advocate for practical solutions that align with reality. For example:

- Push for a reassessment of RHNA mandates based on updated population and housing data.
- Streamline the development process for affordable and moderate-income housing rather than luxury units.
- Incentivize adaptive reuse of vacant commercial spaces for housing in areas already equipped with infrastructure.
- Invest in community land trusts and nonprofit-led developments that prevent displacement and ensure affordability.

### San Francisco Upzoning Map

We also understand that you and your team have been studying alternatives to the current version of the proposed Upzoning Map. NUSF requests that any proposed Upzoning be executed in a thoughtful manner with adequate public notice such that impacts to renters and small businesses are minimized to the greatest extent possible. We ask that you take the following into consideration as you continue your work toward the next iteration of the map.

- Notify all property owners of parcels proposed for upzoning as well as those owners within a 300-foot radius of these parcels. This request has been made repeatedly by NUSF, other neighborhood focused groups, and multiple Planning Commissioners at numerous public hearings. Notification, outreach, and adequate communication is the core of equitable City Planning.
- Eliminate all Upzoning on parcels officially designated as historic at the local (Articles 10 and 11) level as well as all California and National Register properties, including historic districts.

- Prioritize protection of known historic resources, as well as neighborhoods with a high concentration of buildings constructed prior to the 1906 earthquake and those in the rebuilding decades of the 1910-1930s.
- Eliminate all Upzoning in areas currently zoned Neighborhood Commercial District (NCD).
- Focus Upzoning on major transit corridors, but not before completion of Specific Corridor Plans for each corridor proposed for Upzoning. Consider prevailing heights and heights in adjacent neighborhoods as these plans are formulated.
- Eliminate “Upzoning Creep” onto the blocks off major transit corridors and into historic and traditionally small-scale residential neighborhoods.
- Consider establishing special zoning districts for parcels that have traditionally held grocery stores across the city so that these stores, including adequate parking, remain viable in their current locations, serving the neighborhoods and residents of our city.
- Coordinate with the Office of Small Business to develop tools to protect and support our small and legacy businesses prior to adopting the Upzoning Map.
- Ensure parcels owned by San Francisco Unified School District are not Upzoned (example Galileo High School Athletic Field @ Van Ness and North Point)
- Ensure parcels owned by the City of San Francisco and administered by San Francisco Recreation and Park are not Upzoned; consider adding a map filter to show all San Francisco Recreation and Park sites (similar to the Schools filter) so that viewers of the map can understand where Upzoning may impact park spaces and adjacent parcels.

Sincerely,

Lori Brooke

Co-founder, Neighborhoods United SF

cc:

Rachael Tanner, Director of Citywide Planning, Planning Department

Joshua Switzky, Deputy Director of Citywide Policy, Planning Department

Lisa Chen, Principal Planner, Planning Department

Lydia So, Planning Commission President

Kathrin Moore, Planning Commission Vice President

Derek Braun, Planning Commissioner

Amy Campbell, Planning Commissioner

Theresa Imperial, Planning Commissioner

Sean McGarry, Planning Commissioner

Gilbert Williams, Planning Commissioner

Trent Grennan, Senior Architect/Urban Designer, Planning Department

Jonas P. Ionin, Commission Secretary, Planning Department

Mayor London Breed

Daniel Lurie, Mayor-Elect (emailed separately)