

January 9, 2024

Rich Hillis, Director of Planning  
San Francisco Planning Department  
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**Subject: Height Limit Increases Proposed by SF Planning Department**

Dear Director Hillis:

We are writing to you today on behalf of Neighborhoods United SF, a group of long-established neighborhood organizations across San Francisco, to provide thoughtful and knowledgeable input into the current efforts of the Planning Department to address the Housing Element requirements. We are concerned about the proposed zoning changes in our neighborhoods and urge the city to reconsider its approach to meeting the state's mandated Regional Housing Needs Allocation (RHNA) goal of 82,069 new housing units by 2031 by pausing height limit increases to allow meaningful time for the Planning Department, the development community, residents, and small businesses to digest the recent flurry of local and state housing legislation and to allow meaningful public input from all stakeholders to determine what height limit changes are actually necessary.

As neighborhood groups, we have been supportive of housing within existing height limits and zoning standards with community input between project sponsors and residents. For example, several of us are members of the Van Ness Corridor Neighborhood Council which has worked with and supported housing projects along Van Ness over several years. We positively consider thoughtful land use changes that

respect the hard-fought decisions that have protected San Francisco's character and built landscape over many years.

Our organizations collectively have thousands of members and decades-long experience in responsible land use and development planning. We also represent neighborhoods of the City that must carefully balance San Francisco's strong tourism sector with the needs and priorities of residents.

The northern part of the City was once slated for freeways and our predecessors fought back in the famous "freeway revolts" that are now seen as prescient in protecting what makes San Francisco special for residents, businesses, and tourists. Although facially a change from, for example, the 40 to 65 feet height limit seems small, but when combined with density decontrol and the State Density Bonus programs, that small change could lead to the development of buildings over 100 feet and beyond with no public input. Fortunately, the City did not erect freeways along the northern waterfront, and now the City should think carefully before opening the door to walls of high-rise towers from the Embarcadero to the Presidio. Additionally, these current upzoning proposals will provide minimal benefit to the City's goal of producing more affordable housing given that these areas will be prime for ultra-luxury high-rise development with Golden Gate Bridge, the Bay or ocean views. Also concerning, these changes wash away hard-fought community-led efforts such as the Van Ness Avenue Area Plan which was nuanced in its approach as well as other community-led efforts, for example, preservation of the small-scale urban form of Pacific Avenue with its existing 40-foot height limit or site-specific negotiated compromises such as the Lucky Penny site to 85 feet (now slated to be upzoned to 240 feet).

We are troubled that large swaths of San Francisco are being upzoned with most people not even aware of it. We are concerned that, however well-intended, upzoning

will not work, that it is based on a fundamentally flawed real estate version of “trickle-down” economics, that it will not deliver the affordable housing that we need, and that it does not address the underlying financial conditions affecting the housing market (e.g., interest rates, lending availability, high labor and material costs). We are especially concerned that height limits in place for decades are being overrun with little or no input from the public, putting the scale and character of our neighborhoods at risk, and forever changing what we all love about San Francisco.

We do not support these proposed height limit changes across San Francisco which could fundamentally change the predominantly low-rise, fine-grained landscape of San Francisco and remove important community input from the planning process. Moreover, many of the parcels slated for these increases already possess rent-controlled housing or important neighborhood servicing businesses, and this could lead to losing more existing affordable housing than what may be gained.

Before the city proceeds with a massive overhaul of long-established zoning laws for San Francisco, we urge the City to reconsider the maps by adding alternatives such as a “dark blue” zoning where you keep existing height limits but allow greater density when the State Density Bonus is not applied. Look at the current Lucky Penny project as an example of greater density but within the height limit. Also, create further incentives for ADU units which by design are going to be more affordable than high-rise towers. Start with something reasonable, see how it works, and adjust it to meet realistic economic conditions.

We propose a collaborative working meeting with the Planning Department to find a path forward that upholds public input, preserves our neighborhood fabric, and maintains San Francisco's historic appeal as a vibrant tourism destination. We aim to

address the concerns of residents and local businesses while working with the city on achieving realistic affordable housing goals.

Cordially,

Neighborhoods United SF and Boards of the following organizations:

Barbary Coast Neighborhood Association

Cathedral Hill Neighborhood Association

Cow Hollow Association

Cow Hollow Marina Neighbors and Merchants

Dolores Heights Improvement Club

East Mission Improvement Association

Francisco Park Conservancy

Golden Gate Valley Neighborhood Association

Laurel Heights Neighborhood Association

Lombard Hill Improvement Association

Noe Valley Neighborhood Council

North Beach Tenants Association

Pacific Avenue Neighborhood Association

Pacific Height Residents Association

Russian Hill Community Association

Russian Hill Improvement Association

San Francisco Land Use Coalition

Save Our Neighborhoods SF

Telegraph Hill Dwellers

Waterfront Action Committee

cc: Mayor London Breed (MayorLondonBreed@sfgov.org)  
Board of Supervisors (board.of.supervisors@sfgov.org)  
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