

April 8, 2025

San Francisco Planning Commission
49 S Van Ness Ave Suite 1400
San Francisco, CA 94103

Dear Planning Commissioners,

I am writing on behalf of Planning Association for the Richmond ("PAR") regarding proposed upzoning in the Richmond District as part of the Planning Department's "Expanding Housing Choice" program. PAR is opposed to the zoning changes as currently proposed, and urges reconsideration of the zoning map that you will be reviewing at the April 10, 2025 meeting of the Planning Commission.

There are many reasons that PAR opposes this Program:

Little or No New Housing is Needed

A recent audit conducted by the office of the California State Auditor has determined that the Regional Housing Needs Assessment ("RHNA") that the Department of Housing and Community Development (HCD) uses to provide key housing guidance for the State's local governments is not accurate. Data entry is flawed; HCD could not demonstrate that it considered all of the factors that state law requires; and HCD could not support its use of healthy housing vacancy rates. Additionally the HCD assessment relies on unsubstantiated projections of future housing needs. (<https://information.auditor.ca.gov/reports/2021-125/index.html>)

San Francisco's housing debate is stuck in outdated mandates and assumptions that no longer reflect reality. In addition to the inaccuracy of the RHNA numbers, from 1990-2023, San Francisco's population grew 11.7%, while the City added 27.3% housing units. And San Francisco's future growth is projected to be only .03% from 2020-2030. There is no need to add over 82,000 new homes for only 2,683 new residents.

Since 2020, the city's population has dropped by 65,000. Vacancy rates are up—with over 40,000 homes currently sitting empty. These are not crisis conditions—they show a failure to make existing housing work for the people who need it.

The Plan Does Not Meet the City's Need for Affordable Housing

The proposed upzoning plan fuels speculative development, threatening to replace existing affordable housing with luxury condominiums. This leads to the demolition of rent-controlled units, displacing tenants, many of whom have lived in their apartments for decades. The city acknowledges the risk of mass displacement but lacks a plan to support affected tenants.

The City should focus on ways to finance the over 72,000 approved, community-backed housing units awaiting construction. Additionally, they should advocate for state recognition of housing capacity recently permitted by four-plexes and six-plexes on single-family lots -- the preferred housing type.

The current upzoning Plan will lead to more evictions, higher rents, and the loss of cherished open spaces.

The Plan Will Harm Small Businesses

Not only will residents lose their homes, but the many small businesses, including over 400 Legacy Businesses that make San Francisco's neighborhoods so unique, will also be decimated. Commercial tenants, almost all of them small independent businesses, will get nothing: California doesn't allow commercial rent control or commercial displacement protections. A small community-serving business that is displaced for new construction will likely never come back.

Since there is no commercial rent control in California, and 90% of business owners in San Francisco do not own their buildings, every new building that replaces a pre-existing one will result in the loss of one or more small businesses. In addition, there are no requirements in the Plan to have new commercial space sized so that it would be affordable, pricing out local businesses by speculative property flips and rising commercial rents. This would have an unacceptable, impermissible impact on the very heart of San Francisco. It must be prevented.

Upzoning will Significantly Impact the Quality of Life and the Environment in the Richmond

The proposed upzoning will radically alter the neighborhood character of the Richmond District, impacting the quality of life for its residents as well as the quality of the environment. Towering buildings in our neighborhoods will cast long shadows, block sunlight, erase historic character, and disrupt the human-scale streetscapes that define San Francisco's unique identity. There will be significantly more congestion and environmental pollution; there are no provisions for increased infrastructure or transit to accompany a significant increase in population; views will be blocked; and beloved neighborhood corridors will be transformed into luxury enclaves for investors—not homes for working families.

The state's mandate represents capacity for 200,000+ new residents, yet there is no clear plan for water, sewer, emergency services, transportation, or schools. The plan allows 80% lot coverage, threatening greenbelts, tree canopy, and neighborhood character, with no updated environmental review. There is no protection against demolition of our history or impact on the community.

There are Alternatives to Extensive Upzoning

PAR does not oppose all development. But instead of a massive upzoning that will create a great deal of disruption and displacement, it favors the following:

- targeted rezoning and development.
- community participation in all development decisions
- protections for tenants and businesses
- the revitalization of downtown San Francisco by converting offices to residences.
- consideration of environmental issues, the need for sound infrastructure and transit planning, and the importance of maintaining community character

PAR looks forward to working with the Planning Commission, the Board of Supervisors, and Mayor Lurie to assure that any new zoning will be equitable as well as effective. We urge the Planning Commission to carefully consider the foregoing in its review of the "Expanding Housing Choice" program.

Thank you for your consideration.

Sincerely,

Jean Barish
President, Planning Association for the Richmond