

Appendix D: General Plan Consistency 2014 Housing Element

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Prepared as Part of the
San Francisco Planning Department's

Housing Element Update 2022



**San Francisco
Planning**

Background

A required building block of any Housing Element update in California is an Analysis of Consistency with the General Plan. This analysis of consistency is necessary to ensure that the Housing Element's policies for growth and land use align with other elements and policies of the General Plan, especially if these elements have not recently been updated.

The General Plan is required to be "internally consistent" meaning conflicts between General Plan elements should be acknowledged and resolved. When conflicts exist, the Housing Element must describe how consistency will be achieved and how the goals of the Housing Element will be addressed.

Some portions of the San Francisco General Plan, such as the Safety Element, the Environmental Justice Framework, and the Transportation Element, are in the process of being updated and analyzed for internal consistency. To ensure consistency between these elements and the Housing Element 2022, Planning Department staff have been meeting bi-weekly since 2020 to provide updates and coordinate key overlapping or relevant policies. The Housing Element 2022 Update recognizes the need for equitable investment in infrastructure, most importantly transit, particularly for areas of the City that have been historically disinvested. The updated Housing Element also promotes equitable distribution of growth in areas of the city that have experienced less new housing in the past 50 years, and are considered well-resourced, along transit corridors and throughout low-density neighborhoods. The future of transportation investments in San Francisco will be further reflected and detailed in the upcoming Transportation Element update and projects from relevant City agencies. The Environmental Justice Framework, still being developed, has informed coordination of environmental justice issues into Housing Element policies. This has led to policies in the Housing Element 2022 Update that address repair and rehabilitation of housing; enforcement of building regulations for new housing development; housing with healthy amenities like open space; affordable water and sewer; preservation of affordable housing units; and anti-displacement strategies. The Safety Element, also still being developed, is coordinating with the Housing Element to incorporate climate resilience policies, to address the City's contribution to the climate crises and increase safety and resilience of the city from all hazards. This is reflected in the Housing Element 2022 Update through policies that incorporate green building practices in retrofits and new construction, improved weatherization to address emerging hazards such as poor and hazardous air quality, and shelter and housing for individuals and families experiencing homelessness to be protected during a disaster.

Other elements not undergoing concurrent updates with the Housing Element 2022 Update were reviewed for analysis of consistency with the updated Housing Element. These are the Commerce and Industry, Recreation and Open Space, Urban Design, Environmental Protection, Community Facilities, Arts, and Air Quality Elements. The proposed amendments discussed herein are a result of this focused analysis. The reason behind proposed amendments can generally be attributed a shift in the policies included in the Housing Element that center around racial and social equity, and an acknowledgement that providing housing for all is not just about providing shelter or a home, but also access to a safe, healthy, welcoming space and community.

Current Proposal

Each section below describes the policies in other General Plan elements that should be updated to reflect the Housing Element 2022 Update. For each proposed amendment this analysis provides includes background on the existing policy, why changes are being proposed, related policies and actions from the Housing Element 2022 Update, the proposed amendments to existing General Plan Element policies, and how the former policy compares to the proposed. For all sections, text from the General Plan are in *Italics*, additions to the General Plan are in single-underline Italics, and Deletions to the General Plan are in ~~strikethrough Italics~~.

1. Commerce & Industry Element, Policy 4.5

- o **Background.** This policy states that residential expansion into existing commercial and industrial uses may be permitted if it does not result in large-scale displacement of existing viable businesses. Residential expansion could result in the displacement of small businesses like those often found within Production, Distribution, and Repair (PDR) districts. PDR businesses often offer well-paid jobs and upward mobility with low barriers to entry. On the other hand, the Housing Element 2022 Update's prioritizes the provision of job and business opportunities to build the wealth needed to afford and meet housing needs.
- o **Proposed Amendment.** The amendment proposes to strengthen the importance of and protection of Production, Distribution, and Repair business, which are increasingly a source of employment and wealth-building needed to afford and meet housing needs:

Control encroachment of incompatible land uses on viable industrial activity.

Production, Distribution, and Repair (PDR) areas offer economic opportunity for adjacent neighborhoods, especially for low-income communities and communities of color. PDR businesses can provide stable job opportunities, good wages, and diversity in types of activities and jobs. Restrict incompatible land uses, such as housing and office, and the conversion of industrial buildings to other building types in PDR districts and in areas of concentrated PDR, construction, or utility activities.

In mixed-use districts or areas adjacent to PDR districts, avoid the displacement of existing businesses, protect the affordability of PDR space, and, if displacement is unavoidable, replace some or all the PDR use with viable, affordable industrial space on-site or off-site in a PDR district.

~~*There are a small number of locations in the city which are a mixture of residential, commercial and industrial uses which were developed prior to modern zoning controls with separate uses. The South of Market area is a prime example. Such areas are resources of needed low cost housing and should be preserved and improved where feasible. Care should be taken, however, to permit residential expansion in a way that will not cause eventual large scale displacement of the existing viable businesses whenever feasible.*~~

~~Another potential problem results from the proximity of the growing office core to smaller scale business and industries in the South of Market area. Growth of the downtown office core should be carefully guided to avoid unnecessary dislocation.~~

○ **Related Housing Element 2022 Policies and Actions.**

- **Policy 16.** Improve access to well-paid jobs and business ownership for American Indian, Black and other communities of color, particularly those who live in Priority Equity Geographies, to build the wealth needed to afford and meet their housing needs.
 - **Action 4.3.3.** Adopt commercial space guidelines that encourage the development of businesses owned by American Indian, Black, and other people of color in permanently affordable housing buildings.
 - **Action 4.3.4.** Provide resources for warm-shell buildout and tenant improvements for businesses owned by American Indian, Black, and other people of color in permanently affordable housing buildings.
 - **Action 4.3.5.** Expand capacity-building, job training, start-up, and business development resources for Black business owners in development and contracting construction trades in support of building housing.
 - **Action 4.3.6.** Grow a range of business and career-building opportunities in Priority Equity Geographies through resources to support affordable Production, Distribution, and Repair (PDR) space, protections and incentives for PDR in the Planning Code, enforcement of PDR zoning, and industrial (or commercial) design guidelines.

The Way It Was:	The Way It Will Be:
The option to expand residential units into existing commercial uses could put PDR businesses at risk of displacement.	PDR and PDR businesses are explicitly named as a type of land use and business that the City should encourage preserving.
It was not clear why encroachment of incompatible land uses on viable industrial activity should be controlled.	The importance of industrial activity, now called PDR, is explicitly listed for consistency with Housing Element Objectives and Policies.

2. Commerce & Industry Element, Policy 6.3

- **Background.** This policy intends to preserve and promote a mixed commercial-residential neighborhood character in commercial districts. It suggests that conversion of existing housing to a commercial use could be principally permitted, depending on the situation. For example, converting “ground-story residential units should be permitted in all neighborhood commercial district without special review.” This policy refers to affordable housing without distinguishing

between low cost housing and permanently affordable housing. This could indicate that demolition or conversion of permanently affordable housing could be permitted without special review in certain circumstances, to create space for commercial use. In addition, this policy includes a detailed table of Guidelines for Residential Conversions and Guidelines for Residential Demolition that are outdated. The Housing Element 2022 Update provides process direction on demolition of non-tenant occupied housing in order to facilitate the production of multi-unit buildings.

- o **Proposed Amendment.** Revise Policy 6.3 for consistency with the Housing Element 2022 Update by explicitly referring to the Housing Element , where policies, guidelines, already provide this information. As the Housing Element 2022 Update introduces the possibility of housing expansion or demolition under specific circumstances, permission to convert or demolish housing for commercial use should be reviewed under the rules established by regulating agencies.

Preserve and promote the mixed commercial-residential character in neighborhood commercial districts. ~~Strike a balance between the preservation of existing affordable housing and needed expansion of commercial activity. Occasionally, the provision of essential neighborhood amenities, goods, or services may require the demolition of existing housing as part of new multifamily development. Such proposals should be reviewed in accordance with the Housing Element and preserve the City's existing permanently affordable and multifamily rental housing stock so that there is no net loss of these housing types nor permanent displacement of rent-controlled tenants.~~

Most neighborhood commercial districts contain dwelling units in addition to commercial uses. Flats, apartments, and residential hotels are frequently located above ground-story commercial uses; fully residential buildings are common in some districts. Existing residential units in neighborhood commercial districts comprise a valuable affordable housing resource which provides for the needs of San Francisco's diverse population. Some of these units still offer affordable rental rates because they are part of the rent control housing stock and home to long-standing tenants. The retention of this mix is desirable. ~~Among other things, it ensures the presence of people on the streets at different times which increases safety and business vitality on evenings and weekends.~~ Residents in commercial areas help to create an active street life, which promotes interaction between people in the neighborhood. In addition to providing needed housing, dwelling units in commercial districts provides other benefits, including ensuring the presence of people on the streets at different times of day which increases safety and business vitality on evenings and weekends, and creating an active street life.

The mixed residential-commercial character of most neighborhood commercial districts should be promoted by encouraging new construction of upper-story residential units above commercial development in mixed-use buildings. In order to make feasible such mixed-use projects, higher residential density ~~and/or reductions in required parking~~ may be warranted. ~~in districts with a reduced need for auto ownership or where anticipated parking demand can be accommodated off site.~~

~~Existing residential units in neighborhood commercial districts comprise a valuable affordable housing resource which provides for the needs of San Francisco's diverse population. Most of these units are in sound or rehabilitable wood frame structures and they are among the least expensive rental units in the city.~~

~~On the other hand, conversion of this housing is an important means of providing competitive and affordable commercial space to small businesses, many of which provide personal, medical, professional and business services to neighborhood residents and the general public. Conversions of ground story residential units should be permitted in all neighborhood commercial district without special review. In many neighborhood commercial districts, the physical location and structural aspects of the upper story housing units make it attractive and feasible to convert them to commercial use. Due to the limited supply of vacant land, some commercial expansion into the residential space may be the only feasible way to adequately meet the commercial needs of the trade area served by the district. Therefore, conversions of upper story units should be accommodated as long as the conversions are not so numerous as to upset the general equilibrium between commercial and residential uses or to constitute a substantial loss of housing.~~

~~Because the appropriateness of residential conversions depends on many factors which vary from district to district, land use controls should be adjusted to reflect the different needs of each district. In most districts certain conversions, such as those at the ground story or third story, can be regulated by permitting or prohibiting them without special review, while those at the second story may need case by case review by the City Planning Commission. In other districts, however, proposed conversions at all stories may need case-by-case review. A balance must be struck between the need to retain the housing and the need to provide for commercial expansion. Some upper story conversions may be appropriate, if based on a review of an individual case, it is found that the need for commercial expansion clearly outweighs the need to preserve affordable housing. In that case by case review the following guidelines should be employed:~~

GUIDELINES FOR RESIDENTIAL CONVERSIONS

~~The need for additional commercial space in the district should be clearly established. The need to preserve affordable housing may be presumed in light of the citywide shortage of such housing and established policy in the Residence Element.~~

~~The amount of commercial space necessary and desirable to serve the retail and service function of a district varies depending on the size of the trade area, proximity to other commercial districts, and competition from other land uses.~~

~~In neighborhood commercial districts consisting of a small cluster of lots or a short linear commercial strip with low scale development, commercial uses at the ground story should be focused on the convenience needs (such as groceries and laundry) of nearby residents. In these districts no new commercial use should be permitted above the ground story, nor should conversions of existing residential units above the ground story be permitted.~~

~~In small-scale neighborhood commercial districts most of the anticipated demand for commercial growth can be accommodated through new construction at the first two stories on vacant or underused parcels without the necessity to convert upper story residential units. However, in some of these districts where demand for commercial space is particularly strong, allowing commercial uses above the second story in new construction and allowing some conversion of existing residential units at the first and second stories may be appropriate as long as the general equilibrium between retail, office, and residential uses is maintained.~~

~~In larger, moderate-scale neighborhood commercial districts which are intended to provide a wider range of goods and services to a larger trade area, growth opportunities through new construction at the first two stories on vacant or underused parcels may be insufficient to meet the demand for commercial space.~~

~~While the retention of mixed-use buildings and the construction of new mixed-use buildings is desirable in these districts, construction of new, fully commercial structures, and some conversion of existing upper story residential units may be appropriate to meet demand if the increased commercial activity would not adversely affect existing traffic or parking congestion.~~

~~Conversions should be disallowed if commercial space suitable for occupancy by the proposed commercial use is available elsewhere in the district.~~

~~Commercial and institutional uses which do not primarily serve the general public usually are not appropriate in neighborhood commercial areas unless they are minor uses ancillary to those which do serve the general public, such as a small dental laboratory or small business accountant.~~

~~Along predominantly residential secondary side streets and alleys of linear or areawide districts, conversions are inappropriate. The more residential character of the secondary streets should be protected in order to provide a transition between the commercial and surrounding residential districts.~~

~~Conversions should not adversely impact the livability of any remaining units in the building. Entrance to the remaining units should be separate from the access to the commercial uses in the building. In buildings where re-conversion back to dwelling units may be desirable, the kitchens should be retained.~~

~~Buildings with five or more housing units contain a large proportion of the housing stock in the neighborhood commercial districts and should be protected from complete conversion to commercial use.~~

~~Conversion may be appropriate if the unit(s) is unsuitable for residential occupancy because of offensive noise, especially from traffic or late night activity, which is generated on the same site or near the unit, or because of the obstruction of residents' access to light and air by a building adjacent to or near the unit(s).~~

~~Conversion may be appropriate if the housing unit is declared by the Superintendent of the Bureau of Building Inspection or the Chief of the Bureau of Fire Prevention to be unsafe and/or incapable of being made habitable for residential occupancy. However, if the property owner has shown~~

~~possible willful neglect or a pattern of negligence in performing ordinary maintenance, thereby resulting in uninhabitable or unsafe units, the conversion should not be permitted, or the property owner should add other replacement rental units to the city's housing supply.~~

~~In evaluating the proposed conversion of a unit which is suitable and safe for residential occupancy, consideration should be given to offsetting the loss of such housing by requiring the applicant to provide comparable replacement housing on the site, or within the neighborhood, or to provide financial assistance toward the creation of new rental housing or the rehabilitation of uninhabitable rental housing.~~

~~Tenant should be given ample written notice by the property owner prior to filing the application to convert the unit(s) and, for any conversion that is permitted, property owners should make relocation assistance available to displaced tenants, i.e. efforts to identify housing comparable in size, price, and location; and the payment of moving expenses and a relocation allowance, particularly in the case of units occupied by low or moderate income residents.~~

~~In evaluating proposed conversions, consideration should be given to economic hardships to both property owners and tenants which might result from the denial or approval of the conversion application.~~

GUIDELINES FOR RESIDENTIAL DEMOLITION

~~The same considerations that apply to conversions apply to demolition of housing units. Therefore, demolitions should be reviewed on a case by case basis using the same guidelines that are to be used in reviewing conversions. Demolition permits should be reviewed in conjunction with the permits for the replacement structures whenever possible. When this is not possible, conditions applying to future building permits may be attached to the demolition permit or the new building permit may require further review. The replacement structure should include housing units for which there is an exhibited demand, or replacement rental units should be added to the city's housing supply. In order to encourage prompt replacement of demolished structures, permits should not be approved for temporary uses, such as general advertising signs or parking, unless such uses are appropriate permanent uses.~~

- **Related Housing Element 2022 Policies and Actions.**
 - **Policy 26.** Streamline and simplify permit processes to provide more equitable access to the application process, improve certainty of outcomes, and ensure meeting State- and local-required timelines, especially for 100% affordable housing and shelter projects.
 - **Action 8.4.8.** Remove Conditional Use Authorizations or other regulatory barriers for lot mergers and lots or proposed densities that exceed conditional use thresholds on housing applications that net two or more housing units, do not demolish existing rent-controlled units, and meet tenant protection, relocation, and replacement standards as recognized in Housing Crisis Act of 2019 to facilitate larger and more efficient housing projects by January 31, 2025.

- **Policy 2.** Preserve affordability of existing subsidized housing, government-owned or cooperative-owned housing, or SRO hotel rooms where the affordability requirements are at risk or soon to expire.
- **Policy 37.** Facilitate neighborhoods where proximity to daily needs and high-quality community services and amenities promotes social connections, supports caregivers, reduces the need for private auto travel, and advances healthy activities.
 - **Action 9.2.14.** Organize housing and neighborhood business and service areas to prioritize proximity in neighborhood planning or development agreement projects that propose land use changes.
 - **Action 9.4.7.** Develop a comprehensive and regularly updated map of daily needs, amenities, and community facilities, to inform the work of the interagency coordination under Action 9.3.3 as well as community-based organizations in planning for services, resources, open space, and businesses to be near each other and supportive to communities.
 - **Action 9.4.8.** Expand and allow community serving uses, such as retail, restaurants, and personal services within areas that are primarily residential especially on corner parcels, especially uses under the Community Benefit Use program defined under Action 9.4.5.
 - **Action 4.3.7** Change regulations and definitions in current Planning code to improve flexibility on allowing home-based businesses and work from home in residential districts, for example, create an accessory entrepreneurial use that allows up to two employees.

The Way It Was:	The Way It Will Be:
The Commerce & Industry Element policy described background and specific guidelines for demolition and conversion of residential spaces to commercial uses.	The Commerce & Industry Element refers to the Housing Element and sets broad guidelines in the consideration of demolition of residential space.

3. Commerce & Industry Element, Policy 6.4

- **Background.** This policy refers to an outdated version of the Housing Element, previously named the Residence Element. The policy also promotes permitting smaller convenience commercial uses, but does not specifically refer to neighborhood-serving commercial uses that meet the needs of surrounding community as stated in the Housing Element 2022 Update.
- **Proposed Amendment.** Remove reference to the Residence Element. In general, the City will remove specific cross references among General Plan elements as much as possible to decrease the potential for inconsistency. The revised policy will be consistent with the Housing

Element 2022 Update by explicitly referencing meeting local communities' daily needs through potential zoning changes. This uplifts the Housing Element 2022 Update's emphasis on a stable community through housing, nearby services, and commercial uses, and commitment to advancing racial and social equity through community investments.

Encourage the location of neighborhood shopping areas throughout the city so that essential retail goods and personal services are accessible to all residents.

Neighborhood shopping districts should be distributed throughout the city so that all residential areas are within a service radius of one-quarter to one-half mile, depending upon the population density and topography of the area served. Most residential areas meet this service area standard, as can be seen on Map 4. Some remaining residential areas which are not served by commercial districts within these distances are served by individual commercial uses located within a quarter of a mile. These individual uses are typically corner grocery stores which are open long hours, providing a range of food and household convenience goods. The few remaining residential areas, which are neither served by neighborhood commercial districts nor by individual commercial uses, are typically of such low density that they cannot economically support nearby commercial activity. It would be appropriate to revise the zoning to allow a smaller convenience commercial use in those areas if local communities seek changes to meet their daily social, service, commercial, and health needs within close proximity ~~a market demand develops, as long as the location meets the criteria of Objective 6, Policy 2 of the Residence Element.~~

○ **Related Housing Element 2022 Policies and Actions.**

- **Policy 17.** Expand investments in Priority Equity Geographies to advance equitable access to resources while ensuring community stability.
 - **Action 9.3.2.** Prioritize investments in Priority Equity Geographies that overlap with Environmental Justice Communities related to improving transit service, parks, streetscape, and neighborhood amenities, in coordination with the investments referenced under Action 9.3.7.
- **Policy 37.** Facilitate neighborhoods where proximity to daily needs and high-quality community services and amenities promotes social connections, supports caregivers, reduces the need for private auto travel, and advances healthy activities.
 - **Action 9.4.3** Develop or adopt certification programs for community-serving businesses, such as grocery stores, childcare centers, healthcare clinics, and laundromats, starting in Priority Equity Geographies so that there is a way to resource or plan for them via other actions.
 - **Action 9.4.2.** Remove Conditional Use Authorizations outside of Priority Equity Geographies where required to remove an existing use, and instead apply

neighborhood notification procedures for proposed demolition of identified community-service uses, such as theaters, grocery stores, and laundromats, by January 31, 2027 and support their economic survival through a replacement provision or participation in a Community Benefit Use program as described in Action 9.4.5.

- **Action 4.4.3.** In Cultural Districts, reduce conditional use authorizations or other entitlement barriers for mixed-use buildings that can commit via deed restriction or other legal agreement to the inclusion of businesses, institutions, or services that support Cultural District needs and identity for a minimum of ten years.
- **Action 9.4.5.** Study the creation of a Community Benefit Use program, referenced in Actions 7.2.2 and 9.4.8, that allows new housing developments to have a highly flexible ground floor use entitlement and tenants to be eligible for rent subsidy in exchange for community participation in tenant selection or for businesses that obtain certifications as described in Action 9.4.3.
- **Action 9.4.8.** Expand and allow community serving uses, such as retail, restaurants, and personal services within areas that are primarily residential especially on corner parcels, especially uses under the Community Benefit Use program defined under Action 9.4.5.
- **Action 4.3.7.** Change regulations and definitions in current Planning code to improve flexibility on allowing home-based businesses and work from home in residential districts, for example, create an accessory entrepreneurial use that allows up to two employees.
- **Action 4.5.2.** Encourage uses in the ground floor of buildings that support housing, neighborhood activity and identity, especially in Cultural Districts, over inclusion of utility infrastructure, such as transformer vaults.

The Way It Was:	The Way It Will Be:
Zoning could be revised to allow smaller convenience commercial use if market demand develops, as long as the location meets certain criteria in the Residence Element.	Zoning can be revised to allow a smaller convenience commercial use to meet the needs of the local community and ensure close proximity to their daily needs, regardless of location, and removing the reference to the Residence Element.

4. Environmental Protection Element, Policy 15.3

- o **Background.** This policy is generally consistent with Housing Element 2022 Update by encouraging housing production to match the demand resulting from local employment. However, the policy specifically places the responsibility of housing production on new

commercial office development projects, while Housing Element 2022 Update also refers to “large institutional employers...such as hospitals and educational institutions.”

- **Proposed Amendment.** Housing production requirements should be placed on new commercial developments and large institutional employers alike, as stated in Housing Element 2022 Update. Encouraging housing production near employment and neighborhood commercial centers can advance the Housing Element 2022 Update’s goals of creating supportive, thriving, and well-connected neighborhoods.

Encourage an urban design pattern that will minimize travel requirements among working, shopping, recreation, school and childcare areas.

An energy efficient transportation system is highly dependent on local land use policies. San Francisco's high density, compact form lends itself to the use of various transportation alternatives in order to satisfy the daily needs of local residents. Recent developments, however, could seriously alter this balance. New housing has not kept pace with the growth in local employment, imposing pressure on existing housing and encouraging housing growth outside the city. Commercial neighborhood districts are under intense development pressure, forcing certain neighborhood services to move outside the area. These trends increase distances, and thus energy requirements, for personal travel.

The city should implement programs that facilitate neighborhoods where proximity to daily needs and high-quality community services and amenities promotes social connections, supports caregivers, reduces the need for private auto travel, and advances healthy activities. reinforce San Francisco's present urban design pattern planned land use pattern. Housing conditions placed on new commercial office development projects should emphasize the provision of housing at or near employment centers.

Neighborhood commercial policies should promote the continued presence of diverse local service establishments. ~~These policies would enhance the city's existing urban character, while keeping personal transportation energy requirements to a minimum.~~

Aligning housing production with job growth, encouraging local businesses, reducing employee need to travel, and centering growth around transit corridors would enhance the city's existing urban character, while minimizing the need for personal transportation beyond these mixed-use neighborhoods.

- **Related Housing Element 2022 Policies and Actions.**
 - **Policy 20.** Increase mid-rise and small multi-family housing types by adopting zoning changes or density bonus programs in Well-resourced Neighborhoods and adjacent lower-density areas near transit, including along SFMTA Rapid Network and other transit.

- **Policy 37.** Facilitate neighborhoods where proximity to daily needs and high-quality community services and amenities promotes social connections, supports caregivers, reduces the need for private auto travel, and advances healthy activities.
 - **Action 9.2.14.** Organize housing and neighborhood business and service areas to prioritize proximity in neighborhood planning or development agreement projects that propose land use changes.
 - **Action 9.4.6.** Create and implement a long-range community facilities plan, and update every 5-10 years, for public facilities including parks, recreation centers, schools, libraries, to accommodate a thirty-year projected population growth, informed by equity metrics in a manner that secures equitable access in Priority Equity Geographies, Environmental Justice Communities, and Well-resourced Neighborhoods that are targeted for increased housing capacity, building on processes such as the Community Facilities Framework, and in collaboration with Interagency Plan Implementation Committee.
 - **Action 9.4.7.** Develop a comprehensive and regularly updated map of daily needs, amenities, and community facilities, to inform the work of the interagency coordination under Action 9.3.3 as well as community-based organizations in planning for services, resources, open space, and businesses to be near each other and supportive to communities.

The Way It Was:	The Way It Will Be:
Housing production requirements to meet the housing demands of major employment centers focused on new commercial office development projects.	The requirement for housing production at major employment centers is extended to large employers, such as hospitals and educational institutions.
The policy emphasized minimizing distances and energy use for personal travel through land use changes.	The policy encourages minimizing personal transportation and energy use through land use changes and centering growth around transit corridors.

5. Urban Design Element, Policy 3.5

- **Background.** San Francisco's design policy of compatibility of neighborhood has been organized around best practices in urban design that arose in response to dramatic changes in scale for newer buildings in older neighborhoods after World War II. They also responded to the loss of the complex and stylistic façades in many old buildings—mostly given craftsmanship and material qualities of buildings built before World War II. These generations of buildings are currently protected by historic preservation requirements and practices and are less in threat. These urban design goals, however, have moved on to supporting less compelling architecture and neighborhoods patterns—many neighborhoods designed and built by developers in the latter

half of the twentieth century where cost and efficiency was more valued than craft and durability. Additionally, being compatible with neighborhood character originated in a desire to avoid overwhelming and intense changes to scale—not one or two stories but much more disproportionate sizes of buildings. This design policy has been reinforcing the same forms of expression now at a detailed scale and suppressing the ability of design and the expression of people to evolve.

- o **Proposed Amendment:** With updated housing policies designed to open housing choice to more households, especially to communities of color and those previously excluded or made to be invisible, design policy will invite expression of creativity, variety, and cultural identity to encourage a sense of belonging.

Relate the height of buildings to important attributes of the city pattern and to the height and character expression of existing development.

The height of new buildings should take into account the guidelines expressed in this Plan. These guidelines are intended to promote the objectives, principles and policies of the Plan, and especially to complement the established city pattern. They weigh and apply many factors affecting building height, recognizing the special nature of each topographic and development situation.

Tall, slender buildings should occur on many of the city's hilltops to emphasize the hill form and safeguard views, while buildings of smaller scale should occur at the base of hills and in the valleys between hills. In other cases, especially where the hills are capped by open spaces and where existing hilltop development is low and small-scaled, new buildings should remain low in order to conserve the natural shape of the hill and maintain views to and from the open space. Views along streets and from major roadways should be protected. The heights of buildings should taper down to the shoreline of the Bay and Ocean, following the characteristic pattern and preserving topography and views.

Tall buildings should be clustered downtown and at other centers of activity to promote the efficiency of commerce, to mark important transit facilities and access points and to avoid unnecessary encroachment upon other areas of the city. Such buildings should also occur at points of high accessibility, such as rapid transit stations in larger commercial areas and in areas that are within walking distance of the downtown's major centers of employment. In these areas, building height should taper down toward the edges to provide gradual transitions to other areas.

In areas of growth where tall buildings are considered through comprehensive planning efforts, such tall buildings should be grouped and sculpted to form discrete skyline forms that do not muddle the clarity and identity of the city's characteristic hills and skyline. Where multiple tall buildings are contemplated in areas of flat topography near other strong skyline forms, such as on the southern edge of the downtown "mound," they should be adequately spaced and slender to ensure that they are set apart from the overall physical form of the downtown and allow some views of the city, hills, the Bay Bridge, and other elements to permeate through the district.

In residential and smaller commercial areas, tall buildings should occur along transit corridors and closest to major centers of employment and community services which themselves produce significant building height, and at locations where more height will encourage social and commercial activity and achieve visual interest consistent with other neighborhood considerations. At outlying and other prominent locations, the point tower form (slender in shape with a high ratio of height to width) should be used in order to avoid interruption of views, casting of extensive shadows or other negative effects. In all cases, the height and ~~character~~ expression of existing development should be considered.

The guidelines in this Plan express ranges of height that are to be used as an urban design evaluation for the future establishment of specific height limits affecting both public and private buildings. For any given location, urban design considerations indicate the appropriateness of a height coming within the range indicated. The guidelines are not height limits, and do not have the direct effect of regulating construction in the city.

o **Related 2022 Housing Element Policies and Actions.**

- **Policy 41.** Shape urban design policy, standards, and guidelines to enable cultural and identity expression, advance architectural creativity and durability, and foster neighborhood belonging.
 - **Action 8.3.1.** Develop Objective Design Standards that replace subjective design review of housing projects while ensuring that new development in existing neighborhoods support livability, building durability, access to light and outdoor space, and creative expression.
 - **Action 8.3.7.** Create and adopt a new objective design standard to require the use of natural and durable materials for front façade and windows, for example stucco, stone, concrete, wood, and metal to replace existing discretionary design guidelines, except in Special Area Design Guidelines or adopted or listed Historic Districts, that require detailed front façade compatibility with surrounding neighborhood architectural patterns, for example window proportions, roof shape, or type of entry.
 - **Action 8.3.8.** Create, complete, adopt, and apply the Ground Floor Residential Objective Design Standards to housing projects to require porches, stoops, and accessible open space under specific conditions to invite social engagement and belonging.
 - **Action 4.5.3.** Create Special Area Design Guidelines if requested by communities in Cultural Districts and Priority Equity Geographies where the design of public space and architecture could help reinforce cultural identities, and in coordination with State requirements.

- **Action 8.3.11.** Replace terminology of “neighborhood character” and “neighborhood compatibility” in the Urban Design Element with terms that more directly support avoiding severe changes to building scale and/or architectural expression that dehumanize the experience of the built environment. Explore implications with Proposition M.
- **Action 8.3.9.** Eliminate the use of “neighborhood character” and/or “neighborhood compatibility” terminology in case report findings towards approvals.
- **Policy 42.** Support cultural uses, activities, and architecture that sustain San Francisco's diverse cultural heritage.
 - **Action 4.4.4.** Utilize the Cultural Districts program to support building permanently affordable housing, along with other housing development and neighborhood investments that include cultural activities, uses, traditions, and spaces, in coordination with Policy 12.
 - **Action 4.4.5.** Increase staff allocation within MOHCD, OEWD, DPW, ARTS, and Planning to create a more robust, sustained, and effective Cultural Districts program, provide more direct support for the development and implementation of their respective Cultural History Housing and Economic Sustainability strategies (CHHESS).
 - **Action 4.5.4.** Study creation of a cultural resource mitigation fund that could be paid into by projects that impact cultural resources to support cultural resource protection and preservation throughout the city, prioritizing funding the development of cultural spaces as described in Action 5.2.5.
 - **Action 4.5.5.** Designate historically and culturally significant buildings, landscapes, and districts for preservation using the Citywide Cultural Resource Survey, Planning Code Articles 10 and 11, and state and national historic resource registries to ensure appropriate treatment of historic properties that are important to the community and to unlock historic preservation incentives for more potential housing development sites.
 - **Action 4.5.6.** Promote the use of the Retained Elements Special Topic Design Guidelines to development applicants to address sites where conserving parts of buildings sustains cultural identity and proposed housing serves the community.
 - **Action 9.1.7.** Establish priority building permit and entitlement Planning Department review process for multi-family residential development projects that rehabilitate or adaptively reuse existing buildings to support sustainable building practices, per Policy 34, while preserving cultural resources.

- **Action 4.5.7.** Develop objective design standards for the treatment of historic buildings and districts to provide consistent and efficient regulatory review that facilitates housing development approvals and protects the City's cultural and architectural heritages.
- **Action 4.5.8.** Promote historic preservation and cultural heritage incentives, such as tax credit programs and the State Historical Building Code, for use in residential rehabilitation projects through general outreach, interagency collaboration with MOHCD and OEWD, building trades collaboration, educational materials, community capacity building efforts, and through the regulatory review process.
- **Action 4.5.9.** Revise Urban Design Guidelines to provide guidance on including signage, lighting, public art, historical interpretation and educational opportunities in housing development projects in a manner that reflects neighborhood history and culture, prioritizing the acknowledgement and representation of American Indian history and culture, in coordination with State requirements.
- **Action 4.5.10.** Complete the Citywide Cultural Resources Survey, including the citywide historic context statement, with ongoing community engagement to identify important individual historic or cultural resources and districts, prioritizing engagement with American Indian, Black, Japanese, and Filipino communities, and other communities directly harmed by past discriminatory actions.
- **Action 4.5.11.** Complete the Heritage Conservation Element of the General Plan to bring clarity and accountability to the City's role in sustaining both the tangible and intangible aspects of San Francisco's cultural heritage, prioritizing engagement with American Indian, Black, Japanese, and Filipino communities, and other communities directly harmed by past discriminatory actions during completion of the element.

The Way It Was:	The Way It Will Be:
The Urban Design policy emphasized neighborhood character and transit nodes as key criteria for determining building heights.	Neighborhood expression and proximity to transit corridors are now key criteria in determining heights of buildings.

6. Environmental Protection Element, Appendix A

- o **Background.** This appendix is repetitive of content that lives elsewhere in the General Plan. In the same way that it is pointing to policies that will no longer exist in the Housing Element, it also has references to other General Plan Elements that are out of date.
- o **Proposed Amendment.** Remove Appendix A and references to Appendix A from Environmental Protection Element.

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Relation To Other General Plan Elements

Conservation, in the broadest sense of the word, refers to the entire process of determining to what extent any of the city's resources - natural as well as man-made — should be protected or used. To limit the scope of the Conservation section of the Environmental Protection Element (as required by State planning law) seems arbitrary. It implies that conservation is not an issue in housing, transportation, urban design, recreation, or any other General Plan element and, furthermore, that conservation of the many worthwhile aspects of the urban environment is somehow of less importance.

Maintaining a proper balance between the preservation and the development of San Francisco's resources is an issue recognized in all the elements of the General Plan. The Urban Design Element, for example, indicates areas of the city where increased height and bulk of buildings would be permissible and areas where open space ought to be protected from any development. The City Planning Commission has adopted General Plan elements for ~~Residencee~~ Housing, Urban Design, Transportation, and Recreation and Open Space. To a varying extent, each of these plans deals with conservation. ~~Objectives and policies from these plans that relate directly to conservation are listed in Appendix A. These are reaffirmed as an integral part of the Conservation section of the Environmental Protection Element.~~

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~~Appendix A Objectives & Policies From Other Adopted General Plan Elements~~

~~Urban Design Element~~

~~City Pattern~~

~~OBJECTIVE 1 EMPHASIS OF THE CHARACTERISTIC PATTERN WHICH GIVES TO THE CITY AND ITS NEIGHBORHOODS AN IMAGE, A SENSE OF PURPOSE, AND A MEANS OF ORIENTATION.~~

~~POLICY 1 Recognize and protect major views in the city, with particular attention to those of open space and water.~~

~~POLICY 2 Recognize, protect and reinforce the existing street pattern, especially as it is related to topography.~~

POLICY 4 Protect and promote large scale landscaping and open space that defines districts and topography.

POLICY 7 Recognize the natural boundaries of districts and promote connections between districts.

Conservation

OBJECTIVE 2 CONSERVATION OF RESOURCES WHICH PROVIDE A SENSE OF NATURE, COTINUITY WITH THE PAST, AND FREEDOM FROM OVERCROWDING.

POLICY 1 Preserve in their natural state the few remaining areas that have not been developed by man.

POLICY 2 Limit improvements in other open spaces having an established sense of nature to those that are necessary, and unlikely to detract from the primary values of open space.

POLICY 3 Avoid encroachments on San Francisco Bay that would be inconsistent with the Bay Plan or the needs of the city's residents.

POLICY 4 Preserve notable landmarks and areas of historic, architectural or aesthetic value, and promote the preservation of other buildings and features that provide continuity with past development.

POLICY 7 Recognize and protect outstanding and unique areas that contribute in an extraordinary degree to San Francisco's visual form and character.

POLICY 8 Maintain a strong presumption against the giving up of street areas for private ownership or use, or for construction of public buildings.

Neighborhood Environment

OBJECTIVE 4 IMPROVEMENT OF NEIGHBORHOOD ENVIRONMENT TO INCREASE PERSONAL SAFETY, COMFORT, PRIDE AND OPPORTUNITY.

POLICY 1 Protect residential areas from the noise, pollution and physical danger of excessive traffic.

POLICY 2 Provide buffering for residential properties when heavy traffic cannot be avoided.

Transportation Element

General

OBJECTIVE 2 USE THE TRANSPORTATION SYSTEM AS A MEANS FOR GUIDING DEVELOPMENT AND IMPROVING THE ENVIRONMENT.

POLICY 3 Reduce pollution and noise.

POLICY 4 Design and locate facilities to preserve the natural landscape and to protect views.

Mass Transit

OBJECTIVE 1 GIVE FIRST PRIORITY TO IMPROVING TRANSIT SERVICE THROUGHOUT THE CITY, PROVIDING A CONVENIENT AND EFFICIENT SYSTEM AS A FEASIBLE ALTERNATIVE TO AUTOMOBILE USE.

Vehicle Circulation Plan

OBJECTIVE 1 ESTABLISH A THOROUGHFARES SYSTEM IN WHICH THE FUNCTION AND DESIGN OF EACH STREET ARE CONSISTENT WITH THE CHARACTER AND USE OF ADJACENT LAND.

POLICY 1 Divert automobile and truck traffic from residential neighborhoods onto major and secondary thoroughfares and limit major thoroughfares to nonresidential streets wherever possible.

POLICY 2 Design streets for a level of traffic that will not cause a detrimental impact on adjacent land uses

POLICY 4 Discourage nonrecreational and nonlocal travel in and around parks and along the shoreline recreation areas.

Recreation and Open Space Element

Citywide System

OBJECTIVE 2 DEVELOP AND MAINTAIN A DIVERSIFIED AND BALANCED CITYWIDE SYSTEM OF HIGH QUALITY PUBLIC OPEN SPACE

POLICY 1 Provide an adequate total quantity and equitable distribution of public open spaces throughout the City.

POLICY 2 Preserve existing public open space.

POLICY 4 Gradually eliminate nonrecreational uses in parks and playgrounds and reduce automobile traffic in and around public open spaces.

Shoreline

OBJECTIVE 3 PROVIDE CONTINUOUS PUBLIC OPEN SPACE ALONG THE SHORELINE UNLESS PUBLIC ACCESS CLEARLY CONFLICTS WITH MARITIME USES OR OTHER USES REQUIRING A WATERFRONT LOCATION.

POLICY 1 Assure that new development adjacent to the shoreline capitalizes on its unique waterfront location, considers shoreline land use provisions, improves visual and physical access to the water, and conforms with urban design policies.

Neighborhoods

OBJECTIVE 4 PROVIDE OPPORTUNITIES FOR RECREATION AND THE ENJOYMENT OF OPEN SPACE IN EVERY SAN FRANCISCO NEIGHBORHOOD.

POLICY 4 Acquire and develop new public open space in existing residential neighborhoods, giving priority to areas which are most deficient in open space.

POLICY 6 Assure the provision of adequate public open space to serve new residential development.

Residence Element

Retention of Existing Housing

OBJECTIVE 3 TO RETAIN THE EXISTING SUPPLY OF HOUSING COMMUNITIIES.

Housing Condition

OBJECTIVE 4 TO MAINTAIN AND IMPROVE THE PHYSICAL CONDITION OF HOUSING.

Neighborhood Environment

OBJECTIVE 6 TO PROVIDE A QUALITY LIVING ENVIRONMENT.

Energy Section of the Environmental Protection Element

Municipal

OBJECTIVE 12 ESTABLISH THE CITY AND COUNTY OF SAN FRANCISCO AS A MODEL FOR ENERGY MANAGEMENT.

POLICY 3 Investigate and implement techniques to reduce municipal energy requirements.

Residential

OBJECTIVE 13 ENHANCE THE ENERGY EFFICIENCY OF HOUSING IN SAN FRANCISCO.

Commercial

OBJECTIVE 14 PROMOTE EFFECTIVE ENERGY MANAGEMENT PRACTICES TO MAINTAIN THE ECONOMIC VITALITY OF COMMERCE AND INDUSTRY.

POLICY 5 Encourage the use of integrated energy systems.

Transportation

OBJECTIVE 15 INCREASE THE ENERGY EFFICIENCY OF TRANSPORTATION AND ENCOURAGE LAND USE PATTERNS AND METHODS OF TRANSPORT--ON WHICH USE LESS ENERGY.

Alternate Energy

OBJECTIVE 16 PROMOTE THE USE OF RENEWABLE ENERGY SOURCES.

- o Related Housing Element 2022 Policies and Actions. n/a

The Way It Was:	The Way It Will Be:
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The appendix referred to relevant policies in other elements of the General Plan.	General Plan Elements will remove such cross-referencing as much as possible to reduce the possibility of inconsistency.
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7. Urban Design, Policy 2.8

- **Background.** This Urban Design Element policy calls against giving up public street areas for private use while an implementing program in the Housing Element 2022 Update calls to facilitate the use of the public ROW for underground private utility infrastructure. Utility requirements for certain private residential developments can restrict the use of the ground floor where housing units could be placed. As San Francisco faces an ongoing housing crisis and a need to reduce constraints to housing, General Plan elements should facilitate a more certain housing development process. In this context, private residential projects should be permitted to use portions of the public right of way below grade to maximize housing units, improve neighborhood streetlife, and ensure a smoother permit process.
- **Proposed Amendment.** The amendment proposes to describe an example whereby allowing limited use of underground public street areas may be in the public interest if housing space and neighborhood streetlife is maximized.

Maintain a strong presumption against the giving up of street areas for private ownership or use, or for construction of public buildings.

Street areas have a variety of public values in addition to the carrying of traffic. They are important, among other things, in the perception of the city pattern, in regulating the scale and organization of building development, in creating views, in affording neighborhood open space and landscaping, and in providing light and air and access to properties.

Like other public resources, streets are irreplaceable, and they should not be easily given up. Short-term gains in stimulating development, increased sales, and additional tax revenues will generally compare unfavorably with the long-term loss of public values. The same is true of most possible conversions of street space to other public uses, especially where construction of buildings might be proposed. A strong presumption should be maintained, therefore, against the giving up of street areas, a presumption that can be overcome only by extremely positive and far-reaching justification.

The best example of an extremely positive justification may be where below grade public rights-of-way could be used for housing-related utilities. In cases where the typical provision of housing-related utilities within a building would reduce space for housing and deaden streetlife, consider allowing the use of the below ground public rights-of-way in a manner consistent with the public interest.

- **Related Housing Element 2022 Policies and Actions.**

- **Policy 27.** Improve coordination, alignment, shared mission, and functionality of post-entitlement permit processes across agencies and jurisdictions to speed housing construction starts after approvals, especially for 100% affordable housing and development agreements.
- **Action 8.3.5.** Revise public right-of-way (ROW) policy, rules, and procedures across city agencies to facilitate the use of the below grade public ROW for utility infrastructure that would currently be required to be installed on private property to maximize the construction of housing units and expedite post-entitlement approvals.

The Way It Was:	The Way It Will Be:
A strong presumption should be maintained against the giving up of street areas, a presumption that can be overcome only by extremely positive and far-reaching justification.	Explanation is added that the use of underground public street areas for housing-related utilities may be within the public interest if housing units and neighborhood streetlife is maximized.

8. Air Quality, Policy 3.3

- **Background.** This policy is generally consistent with the Housing Element 2022 Update by encouraging housing production to match the demand resulting from local employment. However, the policy specifically places the responsibility of housing production on new commercial development projects, while the Housing Element 2022 Update also refers to “large institutional employers...such as hospitals and educational institutions.”
- **Proposed Amendment.** Housing production requirements should be placed on new commercial developments and large institutional employers alike, as stated in Housing Element Encouraging housing production near employment and neighborhood commercial centers can advance the Housing Element’s goals of creating supportive, thriving, and well-connected neighborhoods.

Continue existing city policies that require housing development in conjunction with office development and expand this requirement to other types of commercial and large institutional developments.

Providing housing in conjunction with new employment centers encourages living near work sites and therefore reduces auto commute trips to the city. In the past decade as the result of the housing requirement for new office development, many residential units have been built in the city. This requirement should be expanded to be applicable to other types of commercial and large institutional developments to respond to the housing needs of new developments within the city's boundaries.

- **Related Housing Element 2022 Policies and Actions.**

- **Policy 35.** Require new commercial developments and large employers, hospitals, and educational institutions to help meet housing demand generated by anticipated job growth to maintain an appropriate jobs-housing fit, and address housing needs of students
 - **Action 7.3.5.** Pursue partnerships that commit large employer large institutional employers who that are not subject to job housing linkage fees (such as hospitals and educational institutions) to conduct an analysis of the housing demand of their employees and to meet that demand within institutional master plans or equivalent documents.

The Way It Was:	The Way It Will Be:
Housing production requirements to meet the housing demands of office development and to expand this requirement to other types of commercial developments.	The requirement for housing production is extended to large institutions, such as hospitals and educational institutions.

9. Land Use Index, Housing Policy Index

- **Background.** A land use element is required by the Government Code to include the “general location and extent of the uses of land use for housing.” San Francisco’s Land Use Index contains references to policies within the Housing Element and other General Plan Elements to meet this requirement. These Housing Element policies must be updated in the Land Use Index to reflect land use policies in the Housing Element 2022 Update.
- **Proposed Amendment.** Update Housing Element policies in the Land Use Index to reflect land use policies in the Housing Element 2022 Update.

Housing Element

Objective 1, Policies 1-10

Objective 2, Policies 1-4

Objective 4, Policies 4-5

Objective 7, Policy 5

Objective 11, Policies 1-9

Objective 12, Policies 1-3

Objective 13, Policies 1-3

Objectives 2.B, 2.C, 3.A, 3.B, 3.C, 4.A, 4.B, 4.C, 5.A, 5.C

Policies 12, 15, 17, 18, 19, 20, 24, 25, 30, 31, 35, 37

- **Related Housing Element 2022 Policies and Actions.**

- **Policy 35.** Require new commercial developments and large employers, hospitals, and educational institutions to help meet housing demand generated by anticipated job growth to maintain an appropriate jobs-housing fit, and address housing needs of students
 - **Action 7.3.5.** Pursue partnerships that commit large employer large institutional employers who that are not subject to job housing linkage fees (such as hospitals and educational institutions) to conduct an analysis of the housing demand of their employees and to meet that demand within institutional master plans or equivalent documents.

The Way It Was:	The Way It Will Be:
Housing production requirements to meet the housing demands of office development and to expand this requirement to other types of commercial developments.	The requirement for housing production is extended to large institutions, such as hospitals and educational institutions.