



## **Amy Beinart. People Power Media**

1.1.1: Planning's proposal to start convening the group in March is a VERY TIGHT timeline to submit a budget proposal to be included in the Mayor's budget. This could be pushed back with specific benchmarks; e.g., appoint the stakeholder group in January; hold the first mtg in February; finalize the initial proposal by April 30.

1.2.11: I'd suggest revising to "Work with geographically impacted communities, Cultural Districts, and the State, including Caltrans, to study freeway removal opportunities throughout the City throughout SF as a means of prioritizing the repair of cultural and environmental harm to historically BIPOC communities through the use of state-owned public land for affordable housing."

1.2.12: "Work with geographically impacted communities and Cultural Districts to study..."

1.3.1. "Recognizing that market conditions can change rapidly and to ensure that inclusionary rates are appropriate at the time of production, add an enforceable "use it or lose it" provision to all residential entitlements subject to inclusionary requirements."



## **Celine Puruncajas. United to Save the Mission**

Commissioners,

Celine Puruncajas with United to Save the Mission, District 9 resident, and member of the Race & Equity in all Planning Coalition.

San Francisco's Housing Element must focus on funding and land use solutions for providing stable, dignified, affordable housing for all. It can't be overstated how there is no current housing agenda to support our unhoused neighbors.

Shelters are not housing; cramped single resident occupancy units infamous for noxious conditions and covid breakouts are not equitable permanent housing solutions — where are these people going to go? Currently, the iteration of the Housing Element begs an honest reckoning that predominantly lower income communities of color will continue to operate at a structural disadvantage.

Promises of housing provide the legal and rhetorical cover for police to purge unhoused people from public space, while interim housing, on its surface a humanitarian project, functions as an arm of the prison system, used not to help unhoused people but warehouse them. Stop this violence.

Listen to the communities most proximate to the pain of inequitable policies. I urge all Commissioners to further adopt the factual knowledge of REP-SF's City Wide People's Plan to achieve a Housing Element truly grounded in socio-racial equity.



## Comments to Item #10, 2019-0162230GPA, Housing Element.

Hearing Date: December 8, 2022

Race & Equity in all Planning Coalition

### **Jeantelle Laberinto**

Good afternoon, Commissioners. Jeantelle Laberinto w/ the REP Coalition. Thanks for this conversation today.

The REP Coalition has been following this Housing Element process for over two years. We've painstakingly reviewed every draft, spent time providing recommendations, and over these past two years, we've offered to collaborate constructively with Planning staff to make this Housing Element truly and meaningfully centered on racial and social equity.

We're encouraged by and appreciate Planning coordinating closely with REP over the past two months to incorporate many of our recommendations into the Housing Element's Final Draft. The latest draft just released this week represents some significant and positive progress, however, we have some deep concerns over some of the newly added actions that actively undermine racial and social equity.

Many of these positive revisions are compromised by many of the new actions in Action 8 (Reducing Constraints) others have referenced which are in direct conflict with the stated equity goals of this Housing Element and put our City at risk of not meeting the obligations of Affirmatively Furthering Fair Housing. We understand the need to remove constraints to achieve our RHNA goals, especially our affordable housing targets, but not at the expense of low-income communities, communities of color, and cultural districts. If we are to meaningfully center racial and social equity in our City's housing blueprint, we should be especially critical of any measures that could further displace and destabilize already struggling communities and instead find ways to strengthen their voice and self-determination— through significant increases in investments for affordable housing, retaining existing affordable housing funding mechanisms, retaining community input in decisions that impact their neighborhoods, protecting tenants from displacement as a result of demolitions, and ensuring that any “circuit breaker” focuses on affordable housing production and prioritizing equity outcomes.

We urge that the Planning Commission make further revisions to make sure that the City meets its legal obligations to Affirmatively Further Fair Housing and its goal to center this Housing Element on racial and social equity.



## **Joseph Smooke. Westside Community Coalition**

Good afternoon, President Tanner and Planning Commissioners.

Joseph Smooke with the Westside Community Coalition a member of the Race & Equity in all Planning Coalition. I want to start by expressing enormous respect and gratitude to planning staff for their hard work on the housing element.

REP's Citywide People's Plan honors our community-based expertise. We are architects and planners, and experts in policy with the same degrees from the same universities as the planners who work for the city. We dedicate our lives and our careers to train and engage our communities in policy and planning. Families, seniors, youth, and immigrants. Housed and unhoused. When I read through the latest version of the Housing Element's Implementation Actions, I saw so many revisions that reflect this grassroots expertise. This was a pretty emotional experience.

However, as I kept reading, this sense of value for our communities quickly dissipated.

Actions added to Section 8 about Reducing Constraints intentionally silence low income and communities of color and deny any value capture or resources that developers pay to offset the damage and displacement they inflict on our communities. Some are erroneously calling this a "circuit breaker". In reality, this is a community breaker.

How many "constraints" are you intending to remove? To us, this sounds like Urban Renewal language. You want to upzone for housing we can't afford without our input. You want to limit tenant protections from demolitions. You don't want developers to pay any of the impact fees that have been carefully studied for feasibility. Impact fees are established through nexus studies that evaluate how fees can mitigate harms from new developments. If all impact fees are removed, what are Planning's strategies for mitigating the impacts on our communities? And, what other "constraints" exist that you will seek to eradicate? Will you resort to demolishing our communities again- and this time on an even larger scale- so developers don't have to pay for those costs?

If Commissioners haven't had time to read the latest documents from Planning, you can focus your attention on Actions 8.1.5 through 8.1.8 which undermine all references to racial and social equity, which undermine all the intentions around affordable housing throughout the Housing Element, and which are clearly in violation of the legal framework for Affirmatively Furthering Fair Housing.

I urge you to make significant revisions to the Implementation Actions to make sure that the city is in compliance with its legal obligations to Affirmatively Further Fair Housing and its stated objectives to center this Housing Element on racial and social equity.



## **Priya Prabhakar. People Power Media**

Good afternoon Commissioners, my name is Priya Prabhakar and I am with People Power Media, a member of the Race and Equity in all Planning Coalition. Firstly, REP appreciates the hard work of Planning staff to incorporate many of REP's recommendations into the Housing Element's final draft of the Implementing Programs.

REP supports the recent resolution adopted by the Housing Stability Fund Oversight Board that requests that an Action be added to the Housing Element that identifies the revenue of Proposition I, presently estimated to generate \$170 million dollars in Fiscal Year 2023 - 2024 as an ongoing, annual revenue source available to the City to assist in achieving the Housing Element's affordable housing goals. However, many of the strategies and policies within the Housing Element are still deeply concerning.

I've worked as a tenant and housing organizer for the past two and a half years, mainly in the Mission District, and I've seen first hand how undocumented, immigrant families are deeply vulnerable. The current Housing Element cycle (ending this year) has caused extraordinary displacement to low-income communities of color, and this new Housing Element will only exacerbate that. In fact, given what's in the Housing Element, the impacts and harms of the strategies proposed by Planning will cause even more devastating and widespread harm than Redevelopment. REP and the Anti Displacement Coalition recommend a public hearing process for every development that proposes to demolish existing residential units. A lot of the time, buildings might not look rent-controlled, but they are, and this Housing Element seeks to tear down that essential housing. Even if a property appears to be vacant, we have found that developers and landlords intending to redevelop their properties hide the fact that there are tenants living there or they have intimidated their tenants to leave.

If you hand over to developers a loophole of opting out of public process and continuing to terrorize tenants to leave, this will cause extremely violent displacement, it literally violates sanctuary city policies which San Francisco seems to be so vocal and proud about. The only way tenant advocates have been able to bring these issues to light has been to force a hearing at the Planning Commission.

We need a predictable process, we don't want to force discretionary review. We must bring the Housing Element back in line with the requirements to Affirmatively Furthering Fair Housing.



## **Laura Valdez. Dolores Street Community Services**

Good afternoon, President Tanner and Commissioners.

Laura Valdez with Dolores Street Community Services (DSCS) and a member of the Race and Equity in All Planning Coalition. I am calling to speak on two areas of concern in the Housing Element.

With reference to Section 3 - Preventing and Eliminating Homelessness, DSCS, as an emergency and Permanent Supportive Housing provider, understands that we must ensure emergency shelter beds for everyone who is experiencing homelessness. However, we need to focus on resources and efforts on true housing solutions. SF's Housing Element must focus on funding and land use solutions for providing stable, dignified, affordable housing

With reference to Section 3, "Preventing and Eliminating Homelessness", REP-SF finds that there are too many Actions focused on providing temporary shelter accommodations. It is critical that Planning recognizes the fact that expanding shelter accommodations is not a housing solution. San Francisco's Housing Element must focus on funding and land use solutions for providing stable, dignified, affordable housing for all those experiencing homelessness. Emergency shelters in our city have become permanent housing for our most marginalized and vulnerable adults and families. In our Mission shelter for single adults we have seen day laborers in our community remain at our shelter for decades.

Second in reference to the Coordinated Entry System, Dolores Street Community Services as the provider of the new Mission Access Point believes the system can greatly benefit our unhoused community by creating a "no wrong door to entry" system that is inclusive of self-referrals by unhoused people to case managers in our communities. We must re-open 311 referrals as well as streamline the process for case managers to refer unhoused people to community based shelter beds and vacant units in PSH sites. At our single adult shelter we currently are utilizing a drop-in process where any unused beds are given to unhoused community members in need of shelter.

Thank you,  
Laura



## **Erick Arguello. Calle 24 Latino Cultural District**

My Name is Erick Arguello with Calle 24 Latino Cultural District and we are a member of the Race and Equity Coalition in all Planning. I want to talk about two sections of the housing element.

One under: Affordable housing Productions, Section 1.2.11

*"Work with the State, including Caltrans, to identify and study freeway-related opportunities for potential neighborhood fabric repair and new housing, prioritizing affordable housing and land dedication (as referenced in Actions 1.2.3 and 1.6.1). Focus on freeway segments that need replacement most urgently; contribute to the highest air pollutants impacts, particularly to persons in Priority Equity Geographies; and offer the greatest multi-benefit potential for transforming neighborhoods and producing new housing."*

This section has no equitable community engagement plan for vulnerable communities.

Some language could be:

*"If the freeways are in priority equity geographies or/ cultural districts, engagement is required, and conversations should be led by those communities."*

We need to remember,

Cultural districts are required to provide a CHHESS report that provides cultural economic and affordable housing strategies for each district. That would be our recommendation in order to protect our cultural districts and cultural assets.

Two under: Cultural Districts, Section 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."*

What happens after 10 years? They could not renew the lease and get a high-end business that does not align with the cultural district's goals. The cultural districts were made to be permanent so the criteria should remain through the life of the cultural district.

Should add: these criteria should be followed for the life of the Cultural District These changes are important and will help reach the race and equity lens priorities which are the goals for planning.

Thank you



## **Peter Papadopoulos. Mission Economic Development Agency (MEDA)**

Good afternoon, President Tanner and Commissioners.

Peter Papadopoulos with the Mission Economic Development Agency and a member of the Race and Equity in all Planning Coalition. We want to thank the Planning team for their long hours of work on this document and for their continued diligence as we work through these final phases together.

MEDA wants to focus our brief speaking time today on two key areas towards ensuring we are producing an equitable Housing Element and meeting both our affordable housing RHNA goals and our Affirmatively Furthering Fair Housing requirements.

1) The ongoing loss of BIPOC residents throughout San Francisco -- African Americans from the Bayview, Latinos from the Mission, Filipinos from SOMA, and Chinese community members facing recent increased evictions in the Richmond and surging rents in Chinatown -- makes clear that this City is already facing a significant Fair Housing issue.

We must take great care not to make this situation worse by conflating the idea of removing general housing development constraints such as the cost of land and materials with maintaining our commitments to Fair Housing law through retaining housing processes and culturally-based zoning in our ethnic enclaves.

We can and must maintain both timely housing processes and also keep intact opportunities for BIPOC community voices and culturally protective processes.

2) It is critical that the city launch in January, the Affordable Housing Implementation and Funding Group with community stakeholders that would ensure that we draft and execute plans to fund and build the 46,000 units of affordable housing called for in this plan.

And this Housing Element can take the first big step towards these 46,000 units through a strong commitment to maintain all existing affordable housing fees--including our existing inclusionary and state density bonus fees--to ensure that we are on target to meeting our RHNA affordable housing goals and meeting our AFFH requirements.

Thank you.





## **David Woo. SOMA Pilipinas Filipino Cultural Heritage District and South of Market Community Action Network (SOMCAN)**

Projects like 469 Stevenson will not get us out of our affordable housing crisis. The majority of units will be out of reach to our communities in the South of Market and most low-income and working class children, youth, families, and seniors who are housing insecure in the City. The South of Market and San Francisco do not need more luxury units that increase speculation, evictions, displacement, and gentrification.

The Planning Department has until now failed to incorporate racial and social equity into the planning process. If the City is serious about addressing the lack of equity in planning, there must be a concerted effort to collect, study, and analyze data related to race, class, and displacement.

The conclusions of the updated Environmental Impact Report for 469 Stevenson, that the project will not have significant gentrification, displacement, or cultural displacement impacts, are simplistic, contradictory, and shallow. The report itself admits that 10-41 households could be displaced as a result of the project. The report and the Planning Department still operate under the false narrative that building new market-rate housing will trickle down and lower prices for everyone. The reality is that market-rate units increase rents for working people that already live there, something low-income and communities of color have known for a very long time, with new data coming out that concretely shows this.<sup>1</sup>

Real estate and housing speculation is never studied by these report consultants or by the Planning Department. The truth is that housing is used in the private market as a way to make money - through evicting people, raising rents, flipping buildings, buying land and buildings to speculate - something that never fits into the equation for the City in how to solve the affordability and displacement crisis.

The 469 Stevenson Project shows us what not to do. This project should never have gotten this far if Planning is truly centering racial and social equity. These are expensive luxury units, nearly 70% are studios and 1-bedrooms. This project will increase eviction and displacement pressures in the South of Market. San Francisco has overbuilt luxury housing, and underbuilt affordable housing. That's why there are 60,000 vacant market-rate units, 52,000 market-rate units that have been approved but not yet built, and long waiting lists for affordable housing.

The City and Planning Department need an affordable housing plan. As the Housing Element tries to achieve the state mandated 82,000 units of new housing, we cannot forget that 46,000 of those units (more than half) must be affordable. It's time to stop prioritizing market-rate housing and start building affordable housing, acquiring at-risk units, land-banking sites for 100% affordable housing, and expanding local funding sources.

---

<sup>1</sup> Damiano, Anthony and Chris Frenier (2020), "Build Baby Build? Housing Submarkets and the Effects of New Construction on Existing Rents" Center for Urban and Regional Affairs Working Paper, U of Minnesota



**Charlie Sciammas**  
**Council of Community Housing Organizations (CCHO)**

Good afternoon, Commissioners. My name is Charlie Sciammas with the Council of Community Housing Organizations (CCHO) and we stand united with the Race & Equity in all Planning Coalition.

We appreciate the hard work of Ms Chion and her team at SF Planning to steward the Final Draft of the Implementation Actions of the Housing Element. However, we urge the Planning Commission to incorporate a number of key final revisions.

**1. Timing of Affordable Housing Implementation & Funding Strategy Group**

- In this revised set of Actions 1.1.1, Planning has recommended convening an Affordable Housing Implementation & Funding Strategy group in March, 2023 which is a step in the right direction, but not nearly early enough to have a meaningful impact on this year's budget process.
- We urge the Commission to revise this language to indicate that "by January 31st, the City shall convene the body.... And add that the body will provide an update to the Board of Supervisors in March, 2023, and shortly thereafter present recommendations to be included in the Mayor's budget submission for FY 23/24.
- Additionally, the body will develop a comprehensive set of local, regional, state, and federal funding strategies beyond FY 23/24 to be completed by January 31st of 2024.

**2. Protect Fair Housing Goals By Retaining Community Stabilization & Affordable Housing Measures**

- The loss of African Americans from the Bayview, Latinos from the Mission, and Filipinos from SOMA, Chinese from Chinatown and the Richmond, is a fair housing issue that will only intensify if cultural stabilization "constraints" are removed from these and other equity geographies. The impacts will be especially dire if there isn't a significant increase in investments for permanent, affordable housing.
- In order to bring the Housing Element back in line with the requirements to Affirmatively Further Fair Housing, we urge the Planning Commission to:
  - Retain all existing affordable housing funding mechanisms including inclusionary fees and state density bonus fees to ensure we are meeting the needs of these communities as well as ensuring that San Francisco is on the path to meeting our RHNA affordability goals



**Comments to Item #10, 2019-0162230GPA, Housing Element.**

**Hearing Date: December 8, 2022**

**Race & Equity in all Planning Coalition**

- Prioritize extremely low and low income housing in priority equity communities and those most at risk of displacement and ensure there are mechanisms to fully fund these needs. This is the housing principally occupied by these protected classes in their neighborhoods across San Francisco and will ensure meaningful anti-displacement and community stabilization measures.
- NOT include any "circuit breaker" rezonings, market-rate housing streamlining, or "constraint" removals such as those described in Action 8.1.5, especially in Priority Equity Geographies, Cultural Districts, and other ethnic enclaves, as these mechanisms would bring additional harms to these communities in clear opposition to AFFH guidelines.
- If there's any "circuit breaker" that kicks in to ensure that the city is meeting its production goals, it should be focused on affordable housing, NOT market rate housing because this is the only side of the housing production ledger that will lead to AFFH and equity outcomes.
- Protect tenants from displacement, especially from demolition of existing residential units
- We urge the Planning Commission to make these further revisions to the Housing Element's Implementation Actions to make sure that the city is in compliance with its legal obligations to Affirmatively Further Fair Housing and center this Housing Element on racial and social equity.