



January 29, 2024

Rich Hillis, Director of Planning
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Subject: Request for Changes to Height Limit Increases Proposed by SF Planning Department

Dear Director Hillis,

We have reviewed the Planning Department's packet for the upcoming February 1st Commission meeting. Following your recent discussions with Neighborhoods United SF and the insights you shared about the Planning Department's proposal, we appreciate your openness to incorporating community feedback.

In light of this, we are requesting a reevaluation of the upzoning plans for Lombard, Chestnut, Fillmore and Union Streets, and propose the following changes to the **Upzoning Program**:

For Lombard, Chestnut, Union, and Fillmore Streets, preserve the current 40/45 foot baseline heights. Enable Density Decontrol, applicable exclusively when utilizing the Upzoning Program, without the inclusion of the State Density Bonus (SDB). Implement restrictions on the size of rooftop elevator penthouses.

Our reluctance to support changes in the base zoning, as your current 140' and 85' height increase plans would require, stems from the uncertainty surrounding the SDB and future legislative changes. There's absolutely no assurance that the SDB won't apply on top of any new upzoning plans, and there's always a possibility of new state laws that could override the city's proposed Upzoning Program. This creates an unpredictable and unmanageable situation for our neighborhood. Until the Planning Department can be 100% sure that applying the SDB, or the city's version HOME-SF, will not be allowed on top of any raised heights, Planning should refrain from making permanent and likely



devastating changes to the existing heights. There are still many opportunities to create new housing and/or increase density within existing legislation and height limits.

Transit Hubs and Transit Corridors

The intention to construct 140-foot (14 story) towers at the intersections of Divisadero and Fillmore is alarming, as these structures not only substantially exceed existing height limits, but they will also encourage more development for the high-end luxury view condo market. A significant part of our concern lies in the mismatch between the area's designated status as a transit hub and the actual usage pattern. The justification for such extreme heights based on "transit hub" status is unfounded, as the bus stops here are comparable to many standard ones found citywide. In particular, the bus stop at the Divisadero intersection lacks services that traverse the hill to aid local residents.

In addition, the plan's priority is to build on transit corridors, but not all corridors are created equal. While Lombard Street is acknowledged as a transit corridor, its predominant function as one of the primary thoroughfares from Marin into San Francisco keeps it filled with cars and congestion throughout the day. The introduction of more high-rise luxury condo structures with garage access, coupled with years of ongoing construction, will significantly worsen existing traffic congestion.

85' Tall Buildings Along Lombard

The impact of the proposed 100% increase to 85-foot height (8 stories) cannot be understated, effectively doubling the current structures at the base of the hill and creating both a visual and physical division between the Cow Hollow and Marina communities. These buildings will alter the visual landscape of the neighborhood, clashing with existing architectural styles and overshadowing historically and culturally significant features of this area such as the Palace of Fine Arts, Presidio, and the Lyon Streets Steps. Developers will take advantage of the dramatic new height increase along Lombard to build high-end luxury condos, something this area does not need! This alone shows that the plan will not encourage truly affordable housing which is stated as one of the primary goals of the Upzoning Program. In addition, these increased building heights adjacent to residential properties will lead to a loss of privacy for existing residents, as new buildings will overlook homes, gardens and private spaces as well as cast long shadows over parks, businesses, and homes.



65' Structures on Smaller Commercial Corridors

The historical value and charm of small commercial corridors lies in their walkability, abundant sunlight, outdoor dining options, local retailers, and vibrant restaurant scene. However, implementing a 50% increase in building height to 65-feet (6 stories) along Chestnut, Fillmore and Union Streets poses a significant risk. Such a change would lead to a reduction in sunlight, contributing to a darker, windier environment. Equally concerning is the impact on small businesses during redevelopment. History shows that when properties are rebuilt, smaller enterprises struggle to survive amidst soaring rental demands from landlords, often leading to prolonged vacancies and consequently, a decline in the corridor's appeal. This not only creates blight but also undermines one of San Francisco's most attractive features: its welcoming, outdoor-oriented commercial neighborhoods.

Given these significant concerns, we strongly urge the maintenance of the current baseline of 40/45', codified zoning heights. If consideration of Density Decontrol (form-based density) is applied to these parcels it should only be applied with the new local program. A developer must have to use current base heights and numeric densities if the State Density Bonus (SDB) is elected for the project. These changes would allow greater density while also safeguarding our neighborhood from potential excesses and to preserve its character.

We understand the complexities involved in urban planning and appreciate your willingness to consider our perspective on these critical matters.

Best regards,
Lori Brooke
President, Cow Hollow Association

cc:
Cow Hollow Association Board & Membership
Supervisor Stefani
Supervisor's Aide, Lorenzo Rosas
SF Planning, Principal Planner, Lisa Chen
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