

Western SoMa Community Plan Comments and Responses



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Area of Concerns	Comments	Response
Business - Zoning	Change/ reword zoning laws to section 803.3(b)(1)(c)(ii) to allow therapeutic message near Folsom btw. 4th & 5th	This is part of a larger citywide legislative issue initiated by the Board of Supervisors, and Department of Public Health to curtail human trafficking in San Francisco.
Zoning	What use controls are proposed for MUO district at Tennis Club site?	An early draft of the permitted uses in the MUO has been provided to the author of this comment. This list of allowable uses will be refined prior to adoption of the Plan in 2009. The draft list of allowable uses will be posted to the W SoMa website by mid-2009.
Housing	Near 6th & 7th Street off Brannan carry the burden of big box development. There is no income and/or residential development. Seems like these development are at Townsend to Harrison btw 4th & 7th. Would like to see uses evenly dispersed, housing for middle to low middle income people and seniors.	The group's policy recommendations are to allow these uses up to 25,000 square feet in size, to discourage surface parking lots surrounding the uses, to encourage entrances from the street and discourage patterns where the exclusive entrance to the stores is from the parking lot. There is an acknowledgment among the Task Force that these uses can provide an important basket of affordable goods to SoMa residents and businesses. There is also the concern that the predatory pricing practices of these retail uses can jeopardize the viability of smaller locally owned business found in the SoMa. Additionally, these uses can have a major impact on traffic generation in the neighborhood. Big Box is a type of business that supports the regional economy by taking advantage of the large spaces already existing in the area as old storage spaces used for when the Port was thriving economy. Recycling buildings should be another way to save energy and resources.
Transportation	Was disappointed to see no pedestrian improvements and mid block crossings along heavy-fast-traffic Brannan street where there are several REDs.	A very valid point and should probably be considered as a second phase of pedestrian improvements for the neighborhood. Initially efforts are focused on the much more residential character areas where building a neighborhood commercial street served by transit on Folsom has been the first priority for the Task Force. Perhaps a more detailed analysis of the opportunities for mid-block crossings in proximity to existing and designated residential enclaves is warranted.

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Housing - zoning	Most "artist live/work" in SLI is zoned RED MIXED. It is not legal housing. Is this intended to acknowledge and somehow legalize live/work (commercial) as housing? Developers avoided calling them housing so they would not have to include affordable housing units, rear yards. Most, if not all, have 100% lot coverage, putting additional stress on open space, land, pre-existing housing, and pushing up land value. Live/work developers don't pay school fees or comply with ADA standards associated with housing. Attention must be paid to this issue.	The Task Force debated the issues associated with recognizing the previous live/work uses as contributors to residential enclaves. The careful analysis of yard patterns in residential clusters that is documented in the <i>Housing Strategic Analysis Memo</i> clearly showed the impact of live/work projects on the proportion of at grade yard where live/work was prevalent. Regardless, it was recognized by the Task Force that functionally the live/work units were more akin to residential uses than commercial or industrial uses. With recognition of their predominantly residential character and in now attempting to legalize the live/work units as residential uses, the boundaries for clusters of residential activity were often drawn to include live/work projects that were proximate to other traditional residential uses.
Business	Need to acknowledge the role some WSoMa sites play in the regional economy - the Flower Mart, the auto-repair and convention industry. They should be protected from businesses and housing incursion.	The regional serving role of the neighborhood is recognized in the Task Force Planning Principals that guide the planning process. Allowances have been made for business only areas south of Harrison Street.
Open space	It is well know that SOMA and W SoMa is greatly underserved by open space relative to the rest of the city and the addition of open space is crucial to creating a "complete" neighborhood. Can WSoMa try to implement an Inclusionary Open Space policy? It would essentially require that developers provide a certain amount of either land or money earmarked for open space in W SoMa.	The concept of "inclusionary" policy for open space in already part of the Public Benefit Package adopted as a part of the EN Plan. The PB legislation establishes specific fees that development would pay to support acquisition of land for open space or seed money for open space program.

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Housing	<p>1. Do not agree with limitation of only encouraging new neighborhood residential use only in existing patterns. 2. The height restriction of 40 ft. not in line with encouraging more residents to move into the neighborhood. 3. To establish a maximum number of housing units that can be built in the WSoMa SUD in any given calendar year again is a restriction to developing the area and building a community. WSoMa lacks the drive of small community business to locate here (small stores, coffee shops, restaurants, dry cleaning etc. as there are not enough residents to provide them with continuous trade.</p>	<p>1. The concept of building on the existing residential pattern has four major goals associated with it. First, the only way to promote a neighborhood well served by transit is to increase the density of the existing neighborhood. Secondly, building on the existing pattern promotes access to residential services that are not found in the non-residential areas of the Western SoMa. Third, the discouragement of housing in the non-residential areas of the Western SoMa provides opportunities to business to locate grow and expand in a mixed-use neighborhood environment. The mixed use neighborhood concepts is central to much of the Complete Neighborhood concepts in this Plan. Finally, the Department of Public Health and their Healthy Development Measurement Tool encourages housing in areas where there are residential amenities, services and community facilities.</p>
		<p>2. The limitation of 40 feet in height are only on the narrow alleys in the W SoMa where solar access to the street and yards is essential to the residential quality of life in the neighborhood. This limitation on residential heights is very common throughout San Francisco residential districts and neighborhoods.</p>
		<p>3. The suggested maximum allowable number of housing units to be built in W SoMa is more than twice what the market has produced in any decade since 1989. This proposed housing cap also excludes the parcels of .5 acres or more and all 100 percent affordable housing projects. In total, the proposed infill market rate housing limitations will not significantly impact the overall neighborhood capacity to produce up to 2,700 new units under the proposed zoning. Please study the Housing Strategic Analysis Memo which details how the current pattern of housing production is actually decreasing population density and eliminating family opportunities in the W SoMa.</p>

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Housing	The desire to maintain the same level of affordability to all housing within the area as a goal devalue our area. The principle "generally maintain the existing scale and density of the neighborhood" is directly in opposition with the notion of real "growth. This area has extremely low density. How can we hope to create a thriving neighborhood with the same density we have currently? I believe several of the most critical components in the "Planning Principles" will limit growth to an unhealthy degree for our neighborhood, and will prolong (if not magnify) our existing problems well into the future.	The proposed Plan provides opportunities for over 2,700 new housing units. There are policies that eliminate residential density standards, parking minimums and encourages housing production near transit services and addressing mobility needs in this sunny flat neighborhood with alternative modes of transportation and car sharing.
Housing	In general support of TF findings. However the 700 block Clementina - I encourage PC and/or BOS to 1) allow RED MX zoning (versus RED only) and 2) leave height size at current 50'. Historically (and currently) our beloved alley has had lots of vibrant, quiet, non-polluting commercial use (dot.com, back office support and graphic arts service) Please encourage via zoning these historical and current uses to continue.	Upon re-evaluation and additional field research the RED in 700 Clementina was changed to the RED MX zoning category.
Housing (RED MIX)	Based on visual inspection on 700 block Clementina and my own knowledge of various alley uses I found a SOUTH side 80% commercial and a NORTH side 66% Commercial use: This represents a combined 73% current commercial. My observed current and historical commercial v. residential use numbers - I encourage the 700 block of Clementina to be proposed as RED/MX zoning rather than its current proposed RED.	RED in 700 Clementina was changed already to RED MX
Planning Principles: Mitigate to the fullest extent possible neighborhood impacts resulting from new development	Agree that new development must consider the impact to the neighborhood; however, the Western Soma area is in need of development and this should be encouraged to allow the area to become a vibrant thriving neighborhood that supports all residents.	Development is good, but as you say, it should be balanced. So far, the vast amount of development which has occurred in SoMa has been live/work, residential which cause a tremendous impact on infrastructure and business displacement. This area of the city was not ready for such unplanned and unbalanced growth. This plan presents a rational approach to building on the existing residential character with opportunities for increasing the housing density of the neighborhood on large development sites and on Folsom and 7th Streets.

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<p>Planning Principles: Stabilize the neighborhood against speculative land use proposals and developments.</p>	<p>We need to clearly define “speculative land use.” We agree that development needs to be considered as to the best interests of the neighborhood but we support development resulting in positive change.</p>	<p>The term "speculative land use" is extremely value laden. It seems the term was used early in the Task Force formulation of their planning principals in response to the 1999-2002 live/work development activities that were perceived as have a negative impact on the neighborhood. Since the early use of this term, the Task Force has formulated a positive vision for the neighborhood that is grounded both in local and regional economics as well as a healthy development pattern to guide development for the next 20 years.</p>
<p>Planning Principles: Generally maintain the existing scale and density of the neighborhood.</p>	<p>This principle does not encourage development of Western Soma and thereby limits the opportunity for all people to live and work in the area. It is this “Planning Principle” that serves as the foundation of our problem with the current plan.</p>	<p>There is ample room for growth of both housing and business in the Plan. This neighborhood is asking for no more than the same respect that is given to other neighborhoods in San Francisco. This neighborhood is also willing to absorb significant shares of the City needs for housing, innovative businesses and social services. What really needs to be considered is how a neighborhood that is bisected by major highway systems and some of the most heavy traffic streets in San Francisco can build a residential character that is both safe and healthy for the local residents.</p>
<p>Housing - PLAN p 4: Focused infill housing opportunities that build on existing residential areas with nearby residential services, and</p>	<p>Although the language here may initially read that there is support for additional housing, the actual request is to only support new housing within existing residential areas. We believe that this policy is too restrictive and does not encourage new housing to be built in other compatible areas of the Western SoMa and also limits the incentive for new service oriented businesses wanting to move into this area to serve a thriving community.</p>	<p>The land use tools of segregating non-residential uses that are negatively impacted by peoples expectations for a residential quality of life is a sound planning principal. The opportunities to discourage residential uses where noise, air quality, traffic congestion are incongruous with residential livability is hard to argue with. Maximizing housing opportunities where residential services, amenities and community facilities are provided is rational for future housing production.</p>
	<p>We support more residential units in this area. Western SoMa is arguably the least densely populated area in all of the city. Even with a relative “housing boom” through this area in the last ten years, we still lack the density required for the type of (usable, walkable) community found in other parts of the city.</p>	<p>This may contradict the long term economic needs of the city to have goods and services for non-residential uses provided in proximity to the downtown core and visitor trade activities.</p>

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<p>Housing - PLAN Policy 1.2.4 - Prohibit housing outside of designated Residential Enclave Districts (RED) south of Harrison Street.</p>	<p>This limitation is too broad and will not encourage all people wanting to have an opportunity to live in this diverse neighborhood</p>	<p>People have the right to live where is it safe and where they can be assured a decent quality of life. If the non-residential services are needed in the SoMa to serve the city economy, then not all areas of the SoMa may be appropriate for high density residential development at this point in time.</p>
<p>Housing - PLAN - (p18) Due to the Task Force emphasis on introducing new housing resources in and around existing housing, the Western SoMa Community Plan departs from other Eastern Neighborhoods housing policies and warrants a new policy framework as follows.</p>	<p>This limitation of housing is unduly dictating the character of the neighborhood for the future. The policy should encourage new housing (in fill housing) to a greater number of appropriate locations than limiting it to only existing residential enclave neighborhoods. We should encourage all levels of residential housing development (Market Rate Housing, Medium housing, Low income housing) in line with the citywide policy regulations. No greater restrictions on the type of housing should be levied in this neighborhood.</p>	<p>The Task Force has been considering and has yet to formally decide how to realize opportunities to do exactly what is being asked for by the author of this comment. Currently the provision of Below Market Rate (BMR) housing units in San Francisco does not adequately address either the needs of middle income households or the need for very low income households. Although San Francisco is among the model cities in California for the production of BMR housing opportunities, there are still unmet needs for a full spectrum of housing affordability. The Task Force is still analyzing and evaluating opportunities where housing capacity has been increased in the Plan to encourage a broader spectrum of housing affordability in the provision of BMR units without compromising the City standards for meeting the needs of the most needy.</p>
<p>Housing - PLAN Objective 3.2 - Encourage new neighborhood residential uses in locations that provide the greatest opportunities to build on the existing neighborhood patterns.</p>	<p>See above for our views about the unnecessary restriction imposed to the introduction of new housing sites into the neighborhood.</p>	<p>See responses above.</p>

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<p>Housing - Policy 3.2.1 - Discourage housing production that is not in scale with the existing neighborhood pattern.</p>	<p>We understand that certain height restrictions (40 ft) has been proposed. This needs to be revisited as it should be a policy standard limit for the neighborhood. There should be opportunity for higher building to be built (without the additional restrictions required) to encourage people to want to live in this neighborhood. This restriction is counter productive to the development of a thriving neighborhood.</p>	<p>Heights have been significantly increased on parcels of .5 acres or greater, on Folsom and on 7th Street. These increased height areas more than compensate for the areas where heights have been reduced. The height reductions where residential uses are allowed has only occurred in areas where there are significant concentrations of existing housing resources that are protected by citywide policies that discourage residential demolition.</p>
<p>Housing - Policy 3.2.6 - Establish a maximum number of market rate housing units that can be built in the Western SoMa SUD in any given calendar year.</p>	<p>This policy should allow for all housing to be built (Market rate, Medium income, Low income) in line with the citywide requirements without any restrictions and conditions in excess of citywide requirements. Do not see the restriction for market rate housing to be applied if it is built confirming to the citywide requirements to also include the required proportion of affordable inclusionary housing in the Western SoMa area.</p>	<p>Other locations in California have imposed similar restrictions as a growth management tool. The number set by the Task Force for the production of new in-fill housing on small lots (lots of .5 acres or more as well as affordable housing production is exempt for this proposed cap) is more than twice what the market has produced on average for any decade since 1989.</p>
<p>Housing - PLAN - Implementation 3.2.9.1 - Any residential project in the West SOMA SUD that utilizes a height or density bonus must provide inclusionary affordable housing units in addition to whatever amount is required by the citywide inclusionary housing ordinance then in effect.</p>	<p>Disagree - Western Soma should conform to the citywide inclusionary housing ordinance for affordable housing and should not have any additional restrictions applied.</p>	<p>The Task Force is seeking opportunities to promote a full spectrum of housing affordability and not just a bi-modal distribution of housing production for the very rich and the very needy.</p>

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<p>Policy 3.2.9 - Housing- PLAN - The price levels (rental and sale) required for this additional inclusionary housing and the income limits for its eligible households, provided that they will be somewhat higher than the price levels/limits set by the citywide inclusionary housing ordinance.</p>	<p>Disagree - This policy is an added requirement made by the task force, that this group does not agree with. The area should not be subjected to any additional requirements than those imposed by the city and applied to other neighborhoods in the city.</p>	<p>See comments above that relate to this subject.</p>
<p>Policy 3.2.10 - Prohibit lot mergers that yield parcels in excess of 5,000 square feet.</p>	<p>The policy is unnecessary and should be considered on a case by case basis.</p>	<p>This policy is adopted policy in the Market Octavia Plan Area and assures the smaller scale fabric of the neighborhood stays intact and discourages opportunities to merge parcels and thereby argue for height increase where than have not been previously planned for.</p>
<p>Policy 3.3.1</p>	<p>Disagree - The area should allow for affordable income housing in line with the citywide guidance policies and should not be required to have further restrictions imposed.</p>	<p>See comments above that relate to this subject.</p>
<p>Policy 3.3.4 Require via area plan, zoning, or Planning Code to have a certain amount of new construction be dedicated for rental housing and for affordable rental housing for fixed periods of time.</p>	<p>This policy together with height restrictions, number of residential units to be built per year, requirements for additional affordable housing (greater than the level regulated by the city) is not permitting Western Soma to become a vibrant community for all people.</p>	<p>Requiring rental housing is a standard practice throughout California as a way of preserving access to housing opportunities that would otherwise be out of reach as exclusively ownership opportunities. Los Angeles and numerous other cities throughout California have enacted this type or requirement for specified period of time on new housing production.</p>

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<p>Policy 3.5.2 - Prioritize the development of affordable family housing, both rental and ownership, particularly along transit corridors and adjacent to community amenities.</p>	<p>Why prioritize against the ability for others to purchase such housing? Why make it unnecessarily difficult for those purchasing market-rate housing to use transit services and community amenities? This seems unfair to us.</p>	<p>The idea behind this priority is to give working families with limited means access to residential services and amenities with them being required to have access to a private automobile.</p>
<p>Policy 3.5.7- In areas where new zoning provides opportunities for a significant increase in housing production, require ten (10) percent of all below market rate units that are three or more-bedrooms to ensure affordable family units.</p>	<p>This additional requirement needs to be reviewed to be compliant with the city wide regulations and policies for affordable housing and not impose additional restrictions.</p>	<p>This requirement for a mix of unit sizes assures family opportunities and has been the long standing policy of the San Francisco Planning Commission.</p>
<p>Policy 3.6.1- Require developers to separate the cost of parking from the cost of housing in both for sale and rental developments.</p>	<p>Generally unnecessary</p>	<p>This requirement is existing City policy in the downtown and all the new Planning areas of the Eastern Neighborhoods and Market/Octavia.</p>
<p>Arts component of the Community Plan</p>	<p>[We need to find] a multipart solution to:</p>	
	<p>artisan habitat preservation</p>	
	<p>publicly accessible arts and installation</p>	
	<p>creating opportunities for new space</p>	
	<p>community action site specific preservation zoning (experimental)</p>	
	<p>How to define the Arts in SALI</p>	

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	adoption of the SF Arts Task Force recommendations (requires debras help)	
	Adoption of proposals from the new ordinance modification for SF Culture and Entertainment	
	Specifically earmarking a percentage of community benefit fees for arts facilities	
	Land Banking	
	Developing Programs at Target sites to support existing cultural resources or create new ones with a focus on grassroots and civic cooperation	
	Planning in the hood should include requirements / provisions for construction of 6'X6' concrete pads in context of new development sites and in public locations for location of temporary art installations managed through someone like the Black Rock Arts Foundation.	
Housing and Industrial Uses	<u>Housing</u> : What is the maximum number of housing units that would be allowed under the existing zoning? What is the maximum number of housing units that would be allowed under the proposed zoning? Does the proposed zoning represent a net gain or net reduction in the number of possible housing units from the existing zoning? <u>Industrial Uses</u> : What is the maximum amount of industrial use space that would be allowed under the existing zoning? What is the maximum amount of industrial use space that would be allowed under the proposed zoning? Does the proposed zoning represent a net gain or a net reduction in the amount of possible industrial use space.	
Housing	I have heard it said that the proposed plan would permit 10,000 new units in WSOMA. What assumptions are made about historic preservation, demolition of existing buildings, and open space? The Plan calls for 10 acres of open space per 1,000 residents (Policy 7.2.5) Would these 80 acres include private open space? How many acres total is WSOMA itself? The Housing SAM uses SOMA AND WSOMA interchangeably. What is the best way to access the comments received to date? If possible, please email them to me.	
Section 803.5	Jonathan Tracy runs a dog day care business at 18 Boardman Place and want to expand to allow overnight guest for his clients (who are dog owners?) and like to have Sec. 803.5 clarified because of conflicting languages in the definition of kennels and dog day care licenses.	

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Housing and Services	Lives at 15 Lucerne for 14 years felt that his area is not well covered by the Plan. The area has many residents and is a vital neighborhood but not enough services, like housing, are mapped into the Plan.	
Transportation	David Kirk concerns about turning Folsom into a two-ways street will impact the flow and volume of traffic which is already burdened now by people coming-off and going-to the bridge. Asking TF to understand the flow through Folsom from the stretch between 3 rd and 6 th streets before turning it to two-ways.	
Housing and Transportation	TJ Knighten, family man who lives near 6 th and Howard for 7 years and owns a car and motorcycle but rides his bike to Cal Train. He rides public transit everyday yet feels marginalized because the City wants to reduce parking and transit corridors. He's been around the world and have been to a lot of cities where public where transit work and it is not because of parking issues There are families coming into my neighborhood and there issues about children, where to park the cars, and just everyday things that won't necessary be addressed by making two-ways street, growing palm trees, widening the sidewalk or traffic slowing – it is an industrial part of town. He likes the Plan focuses more on housing rather than regulating it further, making transiting, driving and biking easier.	
Housing and Land Use	First and foremost, your plan to limit new housing and too limit the height of new housing developments will have negative economic impacts on S.F. Real estate in the city is quite expensive -- a major factor contributing to the cost is a relative lack of housing in comparison to demand. Opening up W. Soma to greater development could bring the supply demand ratio into balance and thereby reduce costs -- in turn this would create an opportunity for more families to own in s.f.	The idea of how much new development is enough development is very subjective. We spent the better part of the last three years trying to arrive at a reasonable answer. Aside from an annual limit on small infill projects, we up-zoned Folsom Street to 65 feet, eliminated the IPZ controls north of Harrison Street and created new zoning for 25 new medium and large development sites that will produce thousands more units of housing. In fact, our proposal would double the amount of housing produced compared to what we would see under the current zoning. Jim Meko Response

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Housing and Land Use	Second, by limiting such new construction, you miss a major opportunity for economic development. Fact is, the building trades are one of the few remaining sources of "middle class" jobs in the city. by limiting housing, you effectively limit available work and new hiring for tradesman.	Supply and demand have nothing to do with the San Francisco market. Housing is an investment here, not a commodity. Jim Meko Response
Community Facilities	Thirdly, why doesnt your plan push harder for other elements that truly foster community - schools, libraries, etc? I moved to S.F. in 1981 at the age of 5, and have watched the city loose its families, especially its low and middle income families. You have an opportunity to create a family friendly neighborhood - please, take it!	The Strategic Analysis Memos (SAMs) on our website go into much greater detail as to why we made the choices we did. I'll be sure to look back into the community facilities section in the Jim Meko Response
Entertainment	We need help. The violence and crime that emanates from the Caliente Nightclub, located at 11th and Folsom, threatens to overwhelm this area on the weekends. Tonight we had yet another shooting with the perpetrators fleeing past my window and down Kissling. This follows four busted car windows and car burglaries on my friends' cars alone in the last year, not to mention the myriad other car burgs that are evident by the broken glass every morning Thursday to Monday. We need attention to this club that is nothing but noise, violence and trouble. Please tell me how to start the formal process to get the problems attended to, such as shutting down this club.	
Principle: "Stabilize the neighborhood against speculative land use proposals and developments"	This principle is supported throughout the plan by policies that would limit housing development in WSoMa. Policies in support of this principle include a cap on market rate housing, a ban on housing in some areas, and down-zoning in some areas. A 100 unit- per-year cap on market-rate housing is excessively restrictive and unworkable. Few developers are likely respond because of this.	
Principle: "Proposed new land use development shall primarily serve the needs of existing residents and businesses. Citywide and regional needs are subordinate to existing local needs."	This principle is supported throughout the Plan by policies and implementation measures that do not reflect WSoMa's important place in serving citywide housing needs. WSoMa's proximity to regional and local transit, to other job clusters, and its regional transportation system highlight its important role in meeting citywide and regional needs. A more appropriate approach would be to better coordinate the Citywide, regional and local needs.	

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Principle: “Generally maintain the existing scale and density of the neighborhood.”	What is considered to be the “existing scale and density” is subject to widely varying interpretations. Application of this principle, as reflected in the proposed use and height maps, results in down-zoning portions of WSoMa and up-zoning others. To avoid misunderstanding, SFHAC proposes alternative language.	
Housing, Policy 3.2.6: “Establish the maximum number of market rate housing units that can be built in the WSoMa Special Use District (SUD) in any given calendar year.”	The Task Force has voted to support a limit of 100 new units per year, excluding affordable housing units and those built on selected large sites. This policy would severely limit the amount of non-subsidized housing produced in WSoMa because developers would likely not pursue projects under a process that requires competitive annual selection, particularly of such a small number. The level of uncertainty in attaining entitlements would likely not warrant the effort.	
Housing, Policy 1.2.6: “Prohibit housing outside of designated Residential Enclave Districts (RED) south of Harrison Street. “	This policy does not capitalize on the transit investment at the Caltrans Station and to be made by the Central Subway, which is fully funded.	
Housing, Implementation 3.1.1.2: “Require that new units replacing demolished rent controlled units abide by rent control ordinance.”	This cannot legally be required because state law prohibits it.	
Housing , Policy 3.2.1: “Discourage housing production that is not in scale with the existing neighborhood pattern”	If taken too literally, this policy would encourage new buildings to conform to built, rather than permitted, heights and would likely limit the amount of housing that could be provided as underutilized lots are redeveloped in conformance with zoning regulations.	

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<p>Housing, Policy 3.2.9.1: “Any residential project in the WSoMa SUD that utilizes a height or density bonus must provide inclusionary affordable housing units in addition to whatever amount is required by the citywide inclusionary housing ordinance then in effect.”</p>	<p>This policy needs to be based on an overarching feasibility analysis such as that conducted in the EN process. This was done to prevent many housing projects from becoming infeasible.</p>	
<p>Housing, Policy 3.3.2: “Where new zoning has conferred increased development potential, require developers to contribute towards community benefits programs that include open space, transit, community facilities/services, historic/social heritage preservation and affordable housing, above and beyond citywide inclusionary requirements.”</p>	<p>Again, this policy needs to be based on an overarching feasibility analysis such as that conducted in the EN process so as to prevent many housing projects from becoming infeasible.</p>	
<p>Housing, Policy 3.3.4: “Legislate required periods of housing to be retained as rental as per model legislation previously enacted in Los Angles.”</p>	<p>Would this apply to every project, such that no new condominiums or cooperatives could be built? Was this legislation successful in Los Angeles? It is unclear how it would be applied In San Francisco since a rental project without a condo map cannot obtain financing and building rental housing under current economic conditions is quite difficult. Refer to the Los Angeles ordinance (#170182).</p>	
<p>Housing, Policy 3.2.10: “Prohibit lot mergers that yield parcels in excess of 5,000 square feet. “</p>	<p>This would inhibit the economies of scale made possible by the creation of larger sites. A Conditional Use requirement for development of sites larger than 10,000 square feet would be preferable.</p>	

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<p>Housing, Policy 3.2.13: “Discourage any and all proposed housing proposals on arterial streets and highways that do not provide a physical buffer from existing traffic and noise pollution.”</p>	<p>It is not clear what constitutes a physical buffer from existing traffic and noise pollution. Does the physical buffer entail a feature above and beyond sound-rated glass and other sound insulation techniques and air filtration for units adjacent to highways and other busy streets, required (or soon to be required) by building codes? The Transportation section of the WSoMa calls out the following streets as neighborhood or regional arterial streets: 4th, 5th, 6th, 7th, 8th, 9th, 10th, 11th, 12th, Bryant, Harrison, Townsend, Brannan, Folsom, and Howard. This policy would affect most of the sites that would allow housing in the WSoMa plan.</p>	<p><i>We suggest that the Plan employ code-required soundproofing and, if within 500 feet of the freeway or other arterials that exceed 100,000 vehicles/day, conduct air quality analyses that could require appropriate air filtration systems. This is now spelled out in the Eastern Neighborhoods and has been proposed citywide by Supervisor Ammiano.</i></p>
<p>Housing, Proposed Zoning Maps. 50-foot-SLR rezoned to 40-foot-RED: The WSoMa Plan extends or adds many portions of the interior of blocks to RED or RED MIX and reduces their heights from 50 to 40 feet. It down-zones much of the 50 ft. SLR areas north of Harrison to 40 ft. RED or RED Mix. Many of the front-halves of the blocks that line Folsom Street between 7th and 10th Streets have been rezoned from 50 ft./SLR to 65ft./NC-T.</p>	<p>Does the proposed re-zoning represent a net gain or net reduction to the existing zoning in the amount of housing that would be allowed? Presumably it is a net gain since most of the RED and RED Mix zones are already built out. Is this true?</p>	<p>Net Gain</p>
<p>Urban Design & Built Form, Implementation 5.1.1.1: Require Conditional Use authorization for all WSoMa SUD development proposals in excess of 40 feet.</p>	<p>The WSoMa Plan proposes prescribed urban design guidelines and revised zoning maps that would guide what type of development could occur on specific parcels in the area, so the rationale behind this blanket conditional use requirement is not clear. Is it that conditional use will provide a means by which additional affordability or community benefit contributions might be exacted? The proposed conditional use would seemingly add an unnecessary and costly step in the development process that would ultimately increase the cost of housing.</p>	

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Area of Concerns	Comments	Response
Urban Design & Built Form, Policy 5.1.2. Encourage historic district and landmark designations throughout the WSoMa SUD.	While recognition and appropriate protection of historic and cultural resources in the WSoMa SUD is desirable, that value needs to be balanced against the need to accommodate new uses, especially for non-contributory buildings or sites.	
Urban Design & Built Form, Implementation 5.1.2.1: Implement creation and demarcation of the Filipino and LGBT Heritage Districts in the Western SOMA.	As shown on page 5.5 in Page & Turnbull's Historic Resources Survey, the two districts appear to encompass most of WSoMa north of Harrison Street. This is where most of the Plan's housing would be allowed, and the broad districts could potentially limit housing on controversial sites. This challenge to housing could be solved by more specifically defining the proposed historic resources.	
Urban Design & Built Form, Implementation 5.1.5.1: Develop building setback requirements that preserve existing and historic street walls.	The existing street wall might not be desirable in many cases and may preserve underdeveloped street-walls in areas with wide streets that could support a higher street-wall while still preserving solar access on streets and sidewalks.	
Urban Design & Built Form, Implementation 5.1.5.2: Require preservation, expansion (where a pattern exists) and new (where no pattern exists) [requirement] of at-grade yards, without Variances or Administrative relief throughout the WSoMa.	Requiring at-grade yards where there is not an established pattern does not provide the most appropriate open space conditions in many conditions (dark slivers of space versus a sunny roof-garden) and this implementation measure would remove the possibility that more appropriate open space configurations on specific sites be considered through the Variance or Administrative relief processes.	

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Area of Concerns	Comments	Response
<p>Urban Design & Built Form, Policy 5.1.6: “Encourage a mix of uses rather than mixed-use developments. In recognition of the diverse uses in the Western SOMA, and that some of these uses may be incompatible within the same building, there are opportunities to retain a mix of uses if appropriate buffers between uses are used to maintain incompatible uses in near proximity to one another.”</p>	<p>The mixed-use building is a proven design typology that supports thriving urban living environments and helps to maximize the amount of housing a neighborhood can support and it should be promoted, not discouraged, in the WSoMa Plan.</p>	
<p>Urban Design & Built Form, Policy 5.2.3: “Require mandatory targets for certain components of the [green] rating systems, specifically, 5 percent to 10 percent of material re-use for development projects, 100 percent diversion of all non-hazardous construction and demolition debris for recycling and /or salvage, 10 to 25 percent onsite renewable generation, water efficient landscaping to reduce potable water consumption for irrigation by 50 percent, and maximize water efficiency within buildings to reduce waste water by 30 percent.”</p>	<p>The logistics of implementing requirements that differ from the City’s newly adopted green building standards would likely trigger enforcement problems, design questions, bureaucratic confusion and permit delays.</p>	

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Area of Concerns	Comments	Response
Urban Design & Built Form, Policy 5.2.4: “Encourage sensitive building use, design and alley guidelines to maximize solar access to all designated Residential Enclave Districts and existing rear yard patterns found elsewhere in the WSoMa SUD.”	Maximizing solar access, if applied literally, would inhibit virtually all development. Also, we don’t understand what “use” has to do with solar access.	
Urban Design & Built Form, Policy 5.2.5: “Require new development to adhere to a new performance-based ecological evaluation tool to improve the amount and quality of green landscaping.”	The logistics of implementing requirements that differ from the City’s newly adopted green building standards would likely trigger enforcement problems, design questions, bureaucratic confusion and permit delays.	
Urban Design & Built Form, : Policy 5.4.1: “On major regional arterial streets, do not permit housing in the first 25 feet on new building heights.”	This policy would not allow housing on the first two floors of buildings on Harrison, Bryant, 9th, and 10th Streets. We are not clear whether other streets would be affected. The reasoning behind this policy apparently is to buffer residential uses from the traffic noise on these heavily trafficked streets.	
Urban Design & Built Form, Policy 5.4.4: “Reduce Residential Enclave (RED) and Service, Art, Light Industrial (SALI) District heights to 40 feet.”	This policy would limit the amount of housing production in existing residential areas, something we generally oppose. By setting height limits to 50 feet, more housing could be produced while ensuring access to sunlight and respect for adjacent building heights. This could be achieved with required setbacks over 40 feet and review procedures rather than a height decrease.	
Urban Design & Built Form, SFHAC Proposed new POLICY 5.4.5. Increase height along the Folsom Street corridor to 85 feet in support of its role as a major transit corridor.		

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Area of Concerns	Comments	Response
<p>Preservation, Encourage historic district and landmark designations throughout the WSoMa SUD.</p>	<p>This Chapter of the Draft Plan contains many policies that are difficult to comment on until their specific application is made clear. They appear very sweeping and could in effect give preservation protection to virtually every building in the area that is over 50 years old. While recognition and appropriate protection of historic and cultural resources in the WSoMa SUD is desirable, this value needs to be balanced against the need to accommodate other important City priorities.</p>	
<p>Preservation, Policies 6.2.2 – 6.2.9: These policies would apply the Secretary of the Interior’s standards to unidentified resources such as alleyways and properties that contain artistic values.</p>	<p>The potential historic district established in the WSoMa Plan is broad enough that it would likely impose significant constraints on most development in the neighborhood north of Harrison Street. A non-contiguous historic district may a better way to prevent the barriers to development that non-contributing properties within the current potential historic district would face.</p>	
<p>Open Space, Policy 7.1.4: “New development shall not result in a net loss of open space.”</p>	<p>This could limit potential housing development sites if it applies to privately owned open space that is not accessible to and usable by the general public.</p>	
<p>Open Space, : Policy 7.1.5: “Require the replacement of open space used in the course of development at a minimum of 1:1 replacement ratio.”</p>	<p>This could limit potential housing development sites if it applies to privately-owned open space as well as publicly owned open space.</p>	
<p>Open Space, Policy 7.1.6: “Development projects on large development sites of one acre or more should provide publicly accessible community space or provide publicly accessible open space.”</p>	<p>This policy needs to be evaluated so the amount of space required to be provided does not render most housing projects infeasible.</p>	

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Area of Concerns	Comments	Response
<p>Open Space, Policy 7.2.5: “Require development projects to contribute to parks and open space directly by creating publicly accessible open space on the site of a project, or by contributing funding for parks and open space such that Western SoMA achieves a standard of 10 acres of open space per 1,000 residents in the WSOMA SUD.”</p>	<p>The proposed fee should be evaluated within context of other proposed community benefit fees, as it is likely that many smaller sites would not be able to provide publicly accessible open space. Furthermore, 10 acres per 1000 residents is a totally unrealistic standard in an urban setting.</p>	
<p>Open Space, Implementation 7.6.4.1: “Assess an impact fee from residential development to be applied towards financing open space for toddlers and elders.”</p>	<p>This fee should be evaluated within context of other fees that apply to residential development in WSoMa. A fee analysis for WSoMa should be completed such that proposed fees in combination do not render the majority of housing development in WSoMa infeasible. Moreover, impact fees can only be legally assessed to mitigate impacts of new projects, not to remedy existing deficiencies.</p>	
<p>Open Space, Implementation 7.6.7.1: “Amend Planning Code to require all new residential and commercial development on medium and large development sites to provide a percentage of ‘private’ open space accessible to the public.”</p>	<p>This could cause security and safety issues and result in an awkward built landscape.</p>	
<p>Open Space, Policy 7.8.2: “Stop granting variance for rear yard requirements.”</p>	<p>Rear yard variances are typically granted to allow another building configuration (such as an at-grade open court) the City feels could be appropriate for a project on a specific site. These configurations are often proposed to maximize the efficiency of housing projects and to make the residential units more livable. Removing the possibility of a rear yard variance could pose additional challenges to potential housing sites that would affect feasibility when combined with the many other barriers to housing development presented in the WSoMa Plan. The policy would better accommodate desirable projects if it would “discourage” rear yard variances rather than “stopping” them.</p>	

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Area of Concerns	Comments	Response
Community Facilities, Implementation 9.2.1.3: “Pay one dollar per square foot of commercial or residential space developed into the Child Care Capital Fund.”	This fee should be evaluated in conjunction with other fees proposed in the WSoMa plan to ensure that housing development projects would not be rendered infeasible on account of their cumulative burden.	
Community Facilities, Policy 9.5.1: “Development projects over 50,000 square feet should provide publicly-accessible community open spaces or provide publicly-accessible open space.”	This could cause security and safety issues and result in an awkward built landscape as 50,000 square feet could be built on fairly small sites.	
Transportation, Implementation 4.7.8.2: “[Residential developments to] provide free or discounted transit passes.”	The existence of a legal nexus to support imposition of such a subsidy is questionable. If such a nexus could be established, this subsidy should be evaluated in conjunction with other fees proposed in the WSoMa plan to ensure the majority of housing development projects would not be rendered infeasible on account of their cumulative burden. In condominium projects, the residents are the owners of the building. Who would be providing the passes?	
Transportation, Policy 4.7.9: “Establish a residential transportation impact fee for development.”	This fee should be evaluated in conjunction with other fees proposed in the WSoMa plan to ensure the majority of housing development projects would not be rendered infeasible on account their cumulative burden.	
Transportation	The Authority strongly supports the Plan's general recommendations for improved pedestrian, bicycle, and transit facilities, as well as the vision for Folsom Street as a community boulevard, and is prepared to work cooperatively with the Task Force and partner agencies to advance these goals. We recognize the need to better balance the dual functions of the transportation system in this area, to serve both local and inter-district/regional travel.	

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Area of Concerns	Comments	Response
Transportation	Significant technical work will be needed to further refine the Plan's recommendations, including prioritizing among improvements and locations, designing projects sufficiently to estimate costs, evaluating traffic circulation benefits and impacts, developing funding plans, and translating broad policies into individual implementation actions. This work would include preparation of the highest-priority projects to compete for funding.	
Transportation	Some issues that the Authority believes will need to be addressed in the next stages include: <ul style="list-style-type: none"> • Operational and multimodal considerations in converting Folsom Street to two-way traffic; • Determining prionnes and project designs for bicycle system improvements, traffic calming and other pedestrian improvements; and • Development of parking management policies to complement plan projects. 	
Transportation	Prioritization of the Plan's recommended improvements and policies will be important, as implementation resources are likely to be limited. To the extent that prioritization has already been done, the Authority recommends documenting that proess. Some potential ways to prioritize include. <ul style="list-style-type: none"> • Prioritizing safety projects and facilities that are currently not up to standard over facilities that would need to be upgraded if further development occurs; • Determining which improvements are possible in the short term as opposed to those requiring a longer time horizon; • Providing improved access to key existing and future transit locations (e.g., the future Central Subway station in Western SoMa) 	

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Area of Concerns	Comments	Response
Transportation	<p>Some potential funding sources of the Plan's recommendations include:</p> <ul style="list-style-type: none"> • Prop K, including multiple funding categories that relate to the Plan recommendations; a contact list is available for the Prop K Five-Year Prioritization Programs, the processes by which sponsoring agencies determine project funding priorities for Prop K programs; • Funding from the Municipal Transportation Agency, Department of Public Works, or other local and regional transportation agencies; • Potential revenues from downtown congestion pricing, which the Authority is currently exploring under its Mobility, Access and Pricing Study • Community Challenge Grants available from the Mayor's Office of Economic Development, available to community groups to conduct public facility improvement planning; • MTC's Lifeline Transportation Program, which can fund new transit service; • Real estate developer contributions and potential development impact fees being considered for the wider Eastern Neighborhoods Plan. 	
Transportation	<p>Two studies that will need to be coordinated with the next stages of project development for any proposals in this area are the Central Freeway/Market-Octavia Study and the Eastern Neighborhoods Transportation Implementation Planning Study (EN TRIPS). The Authority will be leading the former and participate as a partner in the latter. Both efforts have recently received funding from the Metropolitan Transportation Commission (MTC) under its Station Area Planning grant program and could provide the types of technical services noted in Comment #1 above, including: development of Folsom Street design concepts; traffic calming project development; bicycle facility planning, transit service planning, and transit stop improvements</p>	

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Area of Concerns	Comments	Response
Transportation	<p>In addition, the Authority has identified planning funds for Western SoMa priority transportation project development in the form of a \$60,000 grant received from MTC's Community Based Transportation Planning program. The Authority offers to supplement this grant with \$40,000 in Prop K Transportation and Land Use Coordination local matching funds, making \$100,000 available for planning work. These grants are typically targeted at community-based efforts, as a way to develop community skills and capacity in transportation planning and move top-priority projects from concept to grant-ready status. The Authority has had a preliminary discussion with the San Francisco Planning Department regarding how these funds could be applied; recently completed studies in the Tenderloin/Little Saigon and Outer Mission/Exelsior neighborhoods serve as ready examples. To discuss this opportunity further, please contact Chester Fung of my staff at 415.522.4804 or chester.fung@sfcta.org</p>	