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Rich Hillis, Director of Planning San Francisco Planning Department 49 South Van Ness Avenue, Suite 1400 San Francisco, CA 94103

## Re: Proposed Rezoning Plan

The point of local planning is to make development decisions in concert with the community and consider specific neighborhood infrastructure, topology, and environmental and cultural factors not visible at the state level. Unfortunately, this rezoning proposal falls far short of the mark across each of these areas.

The west side of the city is not the "opportunity zone" for densification that it is assumed to be in this proposal and the Housing Element for its lack of supporting infrastructure alone. To begin it boasts the geographically largest emergency service areas which are already understaffed. The only emergency rooms, USCF and St. Mary's) are on the eastern fringe of this area and are already at capacity most of the time. A single police station and six fire stations are woefully insufficient to support the planned density.

These services also lack the essential infrastructure resources such as the extension of the AWSS which has been promised for decades and never delivered. High rises throughout the area will easily overtax the water pressure that is just currently adequate for non-emergency use. Fresh water storage capacity that was reserved for future growth such as the Balboa reservoir is now designated for housing and City College buildings. This lack of capacity even extends to the blended sewer system. Already the treatment plant is frequently at capacity and sandbags are delivered to numerous west-side neighborhoods. The illegal but unenforced paving over of front yards has increased the run-off at a time when climate change is bringing us more intense storms.

Transit is another essential resource that is shrinking instead of growing to meet this new densification. The SFMTA has over the last decade and planned for the future, eliminated stops, and reduced routes and frequency in the name of "efficiency" instead of service as evidenced on all the west side "transit corridors". Without plentiful and regular transit service, new residents will require cars and parking which is already at capacity in most areas. This proposal even includes 6-story density where there is no transit corridor such as Junipero Serra Blvd between Ocean Ave. and 19th Ave. Sloat Blvd. which is served by a single infrequent bus line and has only one business block is also zoned for the same 65-foot heights.

These heights were never imagined when the west side was built out and will have a negative environmental impact on many existing homes. For example, those on Crestlake already have the 60-foot forest of Stern Grove in their rear yards and would lose all southern light due to the height of 65-foot buildings on Sloat Blvd. Additionally, because developers would build on a per-lot basis instead of planned density such as Stonestown or Park Merced there would be no breaks in the vertical massing. This is especially a problem on 19th Ave where the setbacks are already minimal. There is a legitimate purpose to CEQA to promote a livable and healthy community.

Finally, this proposal ignores the preservation of our neighborhood culture and history by rezoning

both National Register properties and Historic Districts. For example, the east side of Junipero Serra and St. Francis Blvd is on the National Registry and protected from such up-zoning. Traveling further south on Junipero Serra there is the Historic District of Ingleside Terraces whose western boundary and parts of its northern one on Ocean Ave. are also improperly up-zoned.

Taken as a whole this plan does not represent a well-researched and responsible urban design to improve the housing density on the west side without undermining the health, safety, and livability of existing residents nor laying the foundation for future ones. We ask that this plan be reconsidered in the holistic light that the City Charter requires.

Sincerely,

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Mark V. Scardina, President Ingleside Terraces Homes Association