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September 25, 2017

Planning Commission
1650 Mission Street, Suite 400
San Francisco, CA 94103

via electronic submission

Subject: Opposition to Adoption of “Urban Design Guidelines,” Concerns and Requests

Dear Planning Commissioners:

The Coalition for San Francisco Neighborhoods (CSFN) opposes several portions of the March 16, 2017 Draft “Urban Design Guidelines” (UDGs) document in its current iteration. Planning staff informed CSFN that the proposed draft of the UDGs will be the “overarching” built-form design document for the entire city. As an overarching document which will have development projects follow some very rough and seemingly arbitrary criteria without mention of the existing Residential Design Guidelines (RDGs) or any neighborhood-specific design guidelines and without any text stating their inter-relationships with the UDGs – especially as no “overlay” criteria exist -- it is critical that some revisions be made before adopting them. CSFN delegates have voiced concerns to Planning staff and asked for changes to problematic text and illustrations in the document and they are still in need of revision. As the UDGs continue to morph, new questions arise.

CSFN seeks the Planning Commission’s assistance in directing Planning staff to make the necessary changes, clarifications and respond to CSFN’s questions. Until this is done to the satisfaction of CSFN and until there is substantial meaningful dialogue with CSFN, these UDGs should be put on hold indefinitely.

CSFN’s CONCERNS and REQUESTS:

1. CONCERN: In regards to applicability, the relationship and respective roles of UDGs, RDGs, neighborhood-specific design guidelines and any other design guidelines are not known from reading this document. Within the body text of the document, no other guidelines besides the Draft “Ground Floor Residential Design Guidelines” (GFRDGs) is mentioned. In addition, it is not clear as to how the UDGs relate to the Urban Design Element of the General Plan nor to the Commerce and Industry Element’s Urban Design Guidelines of the General Plan and conformity to it with the objectives of the UDGs and also in relation to the Priority Policies under Proposition M.

REQUEST: For Planning Commission to direct Planning staff to include the text within

the body of this main UDG document the Urban Design Element of the General Plan and the similarly named Urban Design Guidelines of the Commerce and Industry Element of the General Plan. For a document as important as the “overarching” regulatory document for the entire city, the mere addition of a few more pages to the 71-page work, with roughly 168 arbitrary photos and illustrative pictures that take up the bulk of the document, should not be a major effort as the General Plan text exists today. Staff needs direction from the Commission of the inclusion of these two parts of the General Plan in the main text of the UDGs than as any footnote or as an appendix item as they do not exist in the main body of this work. (See also Item 2B and Item 4 below.)

REQUEST: For Planning Commission to direct Planning staff, since there is no mention of the RDGs nor its relationship to the UDGs, to include text to explicitly state on Page 6 that the RDGs and any other neighborhood-specific or other finer-grained guidelines including that of historical shall be controlling for all residential housing-zoned parcels RH-1, RH-2, RH-3, RM-1, RM-2, RM-3, e.g.

REQUEST: For Planning Commission to direct Planning staff to include the following text:

“For RH-1, RH-2, RH-3, RM-1, RM-2, RM-3, RTO and PDR zoning districts, project applicants shall consult the RDGs and any applicable residential or historic design guidelines depending on where the project would be located and that in the event of a conflict between the UDGs, the RDGs, neighborhood-specific design guidelines, and/or historical design guidelines, the most stringent shall prevail.”

2. CONCERN: Definition changes (Page 8).

A. “Adjacent”: As residential areas in the city are more varied and can change from block to block or even within 100 feet depending on what occurs on the block or neighborhood, it is vital that Planning maintains the definitions as has been codified. Per the March 16, 2017 Draft UDGs, Planning proposes an *alternate* definition for the word “adjacent” (Page 8). “Adjacent” no longer refers to what is immediately next door or about a parcel sharing any property line to another but instead includes the meanings of “near, close or contiguous” which are very subjective and imposes less certainty of the kind of project that will be resulted next to someone. This is a substantive change as sample comparison parcels would include lots that may not have the same zoning district designation nor even share a lot line as under the old definition of “adjacent.” Parcels 1,000 feet away or as “near” or “close” as the city of Oakland could be interpreted as “adjacent.” “Near” and “close” are imprecise and the resulting design of development projects could be disruptive to certain areas -- especially if in well-established streets or areas with limited boundaries. The UDGs would cause less certainty for the neighborhoods which, as CSFN was told, these UDGs would instill more certainty.

The many diverse neighborhoods have been able to each have a sense of place through the current definition of “adjacent” as used in Section 102 – “Definitions” – “Adjacent

Building. Generally, a building on a lot adjoining the subject lot along a side lot line.” This is more precise than what is being proposed to be used as the definition of “adjacent.” All prior Zoning Administrator decisions were based on this current definition which means the lot “next door” rather than the more subject-to-interpretation “near” or “close”. With the change in the definition of “adjacent,” it is possible to have metal-and-glass office-styled buildings on a commercially zoned street that is 150 feet away or ½-mile away to fit the new vague “near” meaning of “adjacent”. Then this office-styled building will be determined to be appropriate next to a row of Edwardians of lower height buildings on a residentially zoned lot.

With prior Zoning Administrator decisions on the appropriateness of design, especially in well-established neighborhoods, the UDGs, with the change of the definition of “adjacent” will wreak havoc on the ambiance of the neighborhood. As the UDGs are not clear on this, the new definition for “adjacent” as being “near, close or continuous” needs to be left to the original Planning Code definition in Section 102 rather than “near,” or “close,” e.g.

REQUEST: For Planning Commission to direct Planning staff to 1) preserve and align with the current traditional definition of “adjacent” as in “adjacent building” in Section 102 of the Planning Code; 2) delete the ambiguous meanings of “close” or near” for “adjacent” as this term will be subject to abuse.

B. “Context”: The UDGs propose to adopt an alternate meaning of “context” as being something that could “contrast” or “reinterpret”. CSFN suggests to use a definition more in line with what lay persons think of when hearing the word “context” such as:

“blend seamlessly with and be a clear and fully compatible design to”

With this new definition of “context,” any person off the street with no architectural or design education can understand what might be expected rather than having a building “contrast” or “emulate” or “reinterpret” a design as these will be used to abuse the designs of existing buildings in the neighborhood.

The March 16, 2017 proposed Draft UDGs text regarding “context” reads:
“The design context of a building may **emulate**, **reinterpret**, or **contrast** <emphasis added> with it (sic) surroundings.”

When a project will be allowed to “contrast with its surroundings,” it will, by virtue of the common definition of “contrast” *not* match anything abutting it or around it. This could potentially be very jarring to the beauty, spiritual health and the welfare of an established neighborhood. By having the UDGs adopt the “architectural context” meaning of “context,” the decision-makers can create exceptions (see Item 6 below) to the project design that does not respect the main style or flavor of the particular neighborhood. This *esoteric* application of a new meaning for “context” is not one that an average, regular person of general intelligence would think would be the meaning of “context,” and thus the new definition with “reinterpret” or

“contrast” should be stricken from what “context” would do.

Use of the architectural meaning of “context” in the UDGs could enable decision-makers to pass incongruous and out-of-character buildings as in *design* “spot-zoning”. CSFN is aware that the RDGs utilize designs of buildings next door and/or across the street as the main design determinants for new development so when one parcel is “design-spot-zoned,” one can change the entire look of a neighborhood, and based on the way these UDGs are written, such action may be done “as-of-right.” The public has little recourse with vague and uniquely esoteric definitions arbitrarily being adopted to force certain “designs” as intrusions into neighborhoods.

This vague usage will become important especially for residentially-zoned parcels such as RHs, RMs, RTOs and PDRs abutting NCDs with certain primary design features established through decades and sometimes even as long as over a hundred years of an area being established. The NCDs are also tailored with great sensitivity to the abutting RHs, RMs, RTOs (recently rezoned designation of prior RHs, e.g.) and PDRs through the Urban Design Guidelines of the Commerce and Industry Element of the General Plan do apply (see Item #1 above for inclusion of this text and the Urban Design Element into the UDGs as requested). The words “emulate” and “interpret” are vague and subject to abuse.

REQUEST: For Planning Commission to direct staff to delete the “architectural context” use of the word “context” and utilize one or both of CSFN’s potential definitions for “context” in the paragraph above.

3. CONCERN: Explicit exemption in first sentence is negated in second sentence on Page 6:

“The Urban Design Guidelines apply to buildings in all districts outside RH-, RM-, and RTO- and PDR-districts. In Residential Districts, they apply to projects that have non-residential uses or have either six units or more or frontage longer than 150’ (sic) feet.”

The second sentence that starts with “In Residential Districts” negates the RH-, RM-, RTO- and PDR districts that were excluded in the first sentence. The second sentence by virtue of it referring to “Residential Districts” includes the same districts excluded prior. This means that the first sentence is left with no standing so that the applicability of the UDGs *could* apply to RHs, RMs, etc. as these are technically *residential* districts. The second sentence is vague with “Residential Districts” could allow “spot-zoning” of the UDG-based design styles precisely in the areas to be exempted per the first sentence.

REQUEST: For Planning Commission to request staff to delete the second sentence.

4. CONCERN: This is related to #3 above. Non-complying multi-unit buildings in low-density RH areas and buildings in Neighborhood Commercial Districts (NCDs) influencing

residentially zoned parcels, especially those with adjoining side and rear lot lines (Page 6): Many buildings in NCDs next to RHs, RMs, e.g., have “6 units or more” or have a “frontage of more than 150 feet” because they were built before Planning Code existed. The same goes for many multi-unit buildings which go beyond the unit count of certain zoning district categories for the parcel. Such buildings adjoining parcels in low-density areas may have an architectural design that is not reflective of the bulk of the residential buildings. Some of these are depicted in the March 16, 2017 Draft UDGs.

To create a more uniform feel to certain neighborhoods, there needs to be more guidance in what would not cause such a jarring disconnect of styles especially to the RH, RM and PDR parcels. The UDGs do not make the solution clearer for anyone but instead makes the argument for using the UDGs murkier. Low-density, smaller RH and RM parcels next to these areas with “6 units or more” or with a “frontage of more than 150 feet” have light wells and privacy which are important in RHs and RMs.

REQUEST: For the Planning Commission to direct the Planning staff to not have the March 16, 2017 Draft UDGs as written to apply to ***any*** residential areas nor to any NCDs.

REQUEST: For the Planning Commission to direct the Planning staff to remove any residentially zoned parcels and pictures supporting the above.

5. CONCERN: This is related to #3 and #4 above. Section 312 and notification (Page 6). Lots can be held by multiple people within one entity (e.g. LLC, corporation, or family). These lots may be located mid-block or next to the low-density RH or RM parcels, e.g., or are “6 units or more” or have “frontage longer than 150 feet” and they will not have the RDGs or neighborhood-specific residential design guidelines apply to them since they are located on NCD parcels. The NCD parcels are still subject to the Urban Design Guidelines of the Commerce and Industry Element of the General Plan which takes precedence over these proposed UDGs.

Per the text on Page 6, NCDs are controlled by Sec. 312 which gets an “as-of-right” to not have to consider RDGs / neighborhood-specific design guidelines and only have to follow the UDGs however vague they may be. For these projects, with no further Planning Commission review of the design, people in the neighborhood may file for a Discretionary Review (DR) with no other options or be shut out of the decision-making process.

Should anybody file DRs for certain projects that fall under the UDGs, this would mean more uncertainty for neighbors and project applicants unless the second sentence is removed per #3 above.

Without incorporation of the design policies and guidelines of the General Plan, projects that require Section 312 notification may cease, no residents will have any say on what gets put along their NCDs. It is highly doubtful that any abutting or nearby residents in the neighborhood would know how a building so dissimilar to their area got in, especially with no notification based on what appears to be regulatory in the UDGs.

REQUEST: For the Planning Commission to direct Planning staff to include in the UDGs the text from the General Plan:

“(1) Neighborhood Commercial Design Guidelines. The construction of new buildings and alteration of existing buildings in NC Districts shall be consistent with the design policies and guidelines of the General Plan as adopted and periodically amended for specific areas or conditions by the Planning Commission. The Director of Planning may require modifications to the exterior of a proposed new building or proposed alteration of an existing building in order to bring it into conformity with the General Plan. These modifications may include, but are not limited to, changes in siting, building envelope, scale texture and detailing, openings, and landscaping.”

6. CONCERN: Exceptions are still problematic with the UDGs (Page 4, Page 6 and due to new definition of words on Page 8 per Item 2 above):

On Page 4, the text reads:

“While projects should address all three scales, a context-specific response is not a prescription and each project should be evaluated **on balance**.” <emphasis added>

When projects get reviewed “on balance,” what does that mean? Without knowing the criteria, how much of a “balance” is “on balance”? “On balance” can mean something similar to “other duties as assigned.” With no explicit criteria, decisions will be left to the Design Team or the Zoning Administrator to interpret what would be best for the neighbors in the area of concern. “On balance” and other exception-inducing words should be eliminated.

When things “on balance” are approved, it may mean almost anything could be allowed – with *no* certainty for the neighbors and a potential increase in Discretionary Review (DR) cases before the Planning Commission.

On Page 6 the text reads:

“Projects may seek an **exception** <emphasis added> only when the proposed design better meets the goals of the respective guideline than would a project that had complied with the guideline or where a unique site condition makes application physically infeasible.”

Also the following text:

“Each of these existing procedures would allow a project to seek an **exception** <emphasis added> to specific guidelines, but not the Urban Design Guidelines as a whole, subject to approval by the Planning Commission.”

Such words as “on balance” and other exception statements would be non-conforming to existing Planning Code Sec. 311, including that which violates Building Permit Application (Sec. 311(c)). With the exceptions described on this page, mandatory Section 311 Notification and procedures would be violated or no Section 311 notices would be sent.

REQUEST: For the Planning Commission to direct Planning staff to delete any “exception” or “waiver”-related text in the UDGs.

7. CONCERN: This is related to #1 above. The UDGs are too vague, lack specificity and are ambiguous in many areas and would cause confusion. The city already has the Urban Design Element of the General Plan and the Urban Design Guidelines of the Commerce and Industry Element of the General Plan which govern over and above these UDGs. These UDGs are not needed and appear to work to cumulatively enact zoning change.

An example of this vagary is on Page 4 which states:

“Good urban design is characterized by the thoughtful orchestration of buildings, landscape, open space, and streets.”

What exactly is in the realm of “good” for a development project?

REQUEST: For the Planning Commission to direct Planning staff to come up with a list of criteria the decision-makers will use to determine what is “good”.

Another example is the proposed text of the UDGs on Page 7 reads:

“In addition to graphic renditions of a project, sponsors should provide a narrative that articulates how their project’s design complies with the Urban Design Guidelines.”

This makes it appear that the applicant will give broad brushstroke statements to match the vague UDG design review categories such as “modulate vertically and horizontally” (Page 7) which would fit practically every building description. The granularity for a thorough vetting of a project’s design is missing and will leave the residentially-zoned neighborhoods vulnerable to surprises. Again, no certainty for the neighbors but almost a guaranteed certainty to the developers.

REQUEST: For the Planning Commission to direct Planning staff to insert after “Urban Design Guidelines” in the proposed text on Page 7 to not only provide the graphic renditions and narrative but:

“... and how it complies with the Residential Design Guidelines, neighborhood-specific design guidelines, any other more specific design guidelines including historical guidelines, if any, for the particular area of the city.”

Another example on Page 7, the text by the picture at the upper right corner reads:
“High-rise projects can be thoughtfully related to lower-height neighborhood

patterns.”

This illustration does not show a thoughtful relation but instead shows the high-rise at the back of a low-rise building and possibly eliminating the rear yard. A continuous placement of such high-rises in low-rise building areas can have a cumulative effect of essentially doing a zoning change.

REQUEST: For the Planning Commission to direct Planning staff to delete this picture and the text with it.

Another example on Page 17 in the upper right illustration caption reads:
“Building massing should respect larger patterns in the urban fabric.”

This would potentially shift all development using the form-based UDG principles in the document to shift to ever larger buildings with very little open space even midblock as even the lower illustration on Page 17 shows. Eventually the low-rise areas will get higher and bulkier with less and less mid-block open space per Planning Code today. The cumulative effect of this could also be a zoning change.

REQUEST: For the Planning Commission to direct Planning staff to remove the word “larger” from the top right illustration showing a flow of low-rise buildings to ever larger high-rise buildings.

REQUEST: For the Planning Commission to direct Planning staff to delete from the bottom left illustration “even when the pattern is broken” from the sentence “Shape new projects to contribute to mid-block open space even when the pattern is broken.”

REQUEST: For the Planning Commission to direct Planning staff, for the bottom left illustration, to make it clear what criteria would be used when to “Locate frontages to reinforce the streetwall.” Would lots abutting the proposed building for which the walls would form the “streetwall” have to have their walls already in that way? How about the how the RDGs come into play? etc.?

8. CONCERN: Future projects should not be part of the UDG basis of design review. The text on Page 16 reads:

“Relate building scale and massing to the size and scale of existing **and anticipated** <emphasis added> buildings.”

REQUEST: For Planning Commission to direct Planning staff to remove “and anticipated” from the sentence as designs should be based on buildings present today.

9. CONCERN: Text on Page 17 reads:
“Locate frontages to reinforce the streetwall.”

The UDGs, by forcing the front walls and surfaces of development projects to be located to “reinforce the streetwall,” would create “street canyons” such that pedestrians and vehicles would traverse between these canyons created by two city blocks which in the two illustrations on the page do not illustrate this problematic scenario.

Informationally, here is text about climate-related problems from such canyons created when everything reinforces the streetwall such as those in Hong Kong:

“Hong Kong residents must cope with some of the highest population densities on the planet in an environment that is characterised by ranks of high-rise office and residential buildings, extremely limited urban open space, a measurable urban heat island effect and dangerously high concentrations of roadside pollution that fail to disperse from poorly ventilated street canyons. It is for good reason that the public policy think tank Civic Exchange characterized Hong Kong’s urban livability (with apologies to Thomas Friedman) as ‘Hot, Stacked and Crowded’, in a report published in April 2010.”

Source: <https://lsecities.net/media/objects/articles/the-costs-and-benefits-of-high-density-urban-living/en-gb/>

REQUEST: For Planning Commission to direct Planning staff to create a report on a fully-implemented consequence of the UDGs and its environmental effects under the California Environmental Quality Act (CEQA).

One CEQA category is related to air pollution. Here’s the text from the earlier cited article on Hong Kong:

“The second reason is that the high population densities are brought about by the city’s vertical approach to property development. While public transport benefits from the congregations of potential passengers, the same high-rise buildings ironically form the walls of the street canyons that make it so much more difficult for street-level concentrations of pollutants to disperse. This situation is exacerbated by the low provision of public open space and the consistently excessive height and width of buildings designed to take up every square foot of available land in order to maximize the economic returns.”

Although DBI has enacted an ordinance for the Building Code for buildings to install air filtration systems along the most polluted “transit corridor” or areas of high traffic flow, how are the people, including and especially the children, supposed to play in the newly created open spaces intended to combat the heat sink and livability if they cannot breathe outdoors? Air pollution particulates have no physical boundary to stay on the “transit corridors” nor on the highly trafficked streets. They ooze into the adjacent streets perpendicular and near these pollution alleys.

10. **REQUEST:** For the Planning Commission to direct Planning staff to clarify and

demonstrate with data what the impact would be on all merchants when buildings get reconfigured via the form-based design that is essential for the UDGs to work and for existing buildings when expanded. That clarification should include data on potential displacement or increase in commercial rents for the small businesses, especially in the well-established neighborhood commercial districts (NCDs).

11. **REQUEST:** For Planning Commission to direct Planning staff to clarify how the UDGs, with buildings designed based on form-based density and possibly with larger square footages, would potentially change property taxes for residents or business entities.

12. **REQUEST:** For Planning Commission to direct Planning staff to clarify how the UDGs, which reflects a bias towards ever larger buildings will affect the tenant population and affordable housing.

13. **CONCERN:** The form-based density design concept of the UDGs could very well ignore current Planning Code sections for setbacks, rear yards, and open space requirements. Without such certainty of open ground space or coverage of ground with expanded form-based UDG buildings to the “streetwall” (less open ground in front) and in the rear and side yards, less rainwater permeates into the ground and ends up in the combined sewer system and does not replenish the aquifers. In locations close to the ocean, this may result in saltwater intrusion into the aquifers or subsidence of land.

REQUEST: For Planning Commission to direct Planning staff to clarify via a detailed analysis and study report how the UDGs uphold the policy of the San Francisco Public Utilities Commission (SFPUC) which has gone through large efforts to ensure the use of permeable materials and systems to not cause rainwater runoff to go into the city’s unique combined rainwater and sewage system. Please put together a study on the impacts of supporting the SFPUC policy on diversion of rainwater out of the combined sewer system.

Included in the study would be the total amount of rainwater runoff from all the parcels as they exist today and the amount of that rainwater runoff after the UDGs are implemented for all the parcels potentially affected by the UDGs (show on a map also).

15. **CONCERN:** With the additional land coverage through the form-based UDGs which may not allow as much ground being open with the creation of additional roof and deck surfaces, walls and other materials that are more prone to capture heat and not disperse it, increases to ambient temperatures may increase around all the parcels subjected to the UDGs. San Francisco saw the highest temperature ever recorded since temperatures have been recorded with a high of 106°F on September 1, 2017. Vulnerable populations may be affected.

REQUEST: For the Planning Commission to direct Planning staff to provide the heat sink or absorption criteria to be used with the UDGs.

16. REQUEST: For the Planning Commission to request the Planning staff to produce other city's and town's equivalent of the proposed Draft UDGs where they apply to ***all residential*** parcels with or without overlays or other residential criteria stated in the UDGs.
17. REQUEST: For the Planning Commission to request the Planning staff to answer what happens to a project applicant who does not follow the UDGs. What is the penalty?
18. REQUEST: For the Planning Commission to request the Planning staff to produce a flowchart of which projects would come under the UDGs, where the application gets submitted, who / what section of Planning would review it, if there is a Planning Commission hearing, if there will be neighborhood input, if the project can or cannot be DR'd, etc. This is unclear.
19. REQUEST: This relates to #1 (no RDGs, etc. reference in UDGs) and #2B ("context"). For the Planning Commission to request the Planning staff to insert text that would give certainty to the residents in terms of well-established aesthetics that promote a level of spirituality for a healthy environment. This clarification is needed so that the people of the community can decide for themselves what is beautiful for their specific area, or block or portion of the block. CSFN urges the Planning Commission to direct staff to ensure that the UDGs do not affect the quality of life for those in established areas.
20. REQUEST: For the Planning Commission to direct Planning staff to produce an annual report on where the UDGs have been used so far with the street addresses, block and lot numbers of projects that have utilized the UDGs and determine any social, economic, ethnic, equity impacts.
21. REQUEST: For the Planning Commission to direct Planning staff to eliminate the picture that shows high-rise Manhattan-style buildings next to low-rise non-Manhattan-style buildings to be eliminated:
Page 19: top middle ("Building massing can articulate a unique change in neighborhood scale and orientation.") -- this can apply to any Residential Districts, and this goes to the esoteric definition of "context" as being something that "contrasts" (Item 2B above) so that an ill-fitting design projects gets supplanted into a neighborhood.

The form-based UDGs document makes clear from much of the text and photos that there is a bias towards designs and sizes of building like those found in the downtown high-rise areas and those that emphasize the streetwall as much as possible with no regard to the residentially-zoned low-rise buildings, many in the more established areas of the city that have a very contrasting design style and size. Again, these UDGs do not even mention the RDGs, neighborhood-specific design guidelines, historic design guidelines, etc. It makes no mention in the body of the main text of the UDGs a reference or text from the Urban Design Element of the General Plan nor the Urban Design Guidelines of the Commerce and Industry Element of the General Plan (for neighborhood commercial/commercial areas).

22. **REQUEST:** For the Planning Commission to direct Planning staff to hold robust and meaningful dialogue with all residents of all districts out in every supervisorial district as none has occurred thus far.

23. **REQUEST:** For the Planning Commission to direct Planning staff to produce the notification list to the public of who was informed about the proposed crafting and adoption of the UDGs.

The box at the very top of Page 5 states: “S1 Recognize and Respond to Urban Patterns.” And yet within San Francisco, there are places that are not even in any way seen as fitting an “urban” pattern. What this leads one to believe is that the UDGs can be seen as a regulatory document to do away with the city’s current zoning-based Planning Code with all the flavors of the different residential areas when such parameters that created these long-established areas are eventually eliminated with these overarching urban-biased UDGs.

In general, the UDGs are meant for projects to not follow among other Planning Code sections, e.g. side and rear setback, open space, exposure to light, air, etc. to make it easier to bypass Conditional Use (CU) and Variance hearings while simultaneously cutting out many of the residents’ input. The vagaries of the text and randomly selected photos of mostly downtown designs, not reminiscent of the well-established residential areas of the city especially, would create a situation that would allow a project to go in even though it is totally incompatible with the area.

Since much of the UDGs are following principles emphasized in “form-based design,” it is important to ensure that residential areas are respected and sensitive application of designs abutting the low-density residential areas of RH-1(D), RH-1, RH-2, RH-3, RMs, RTOs and PDRs are carried out. CSFN understands the intent of the design document for Planning Department is to create certainty for the neighbors and the developers on what projects will end up next door. The UDGs do not give the certainty to neighbors in the residential areas nor how the adjacent-to-residential-parcel NCDs will be handled for approval.

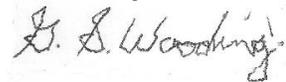
The Urban Design Element of the General Plan and the Urban Design Guidelines of the Commerce and Industry Element of the General Plan establish the framework for any other document and the UDGs are not needed with these Elements of the General Plan. If the UDGs are adopted as is, these form-based design guidelines, with cumulative changes for the entire city, can alter the landscape of the city so as to act as the instrument to create zoning change citywide as they are not all about design but lay of the land in terms of size, bulk and placement for all parcels.

CSFN opposes the adoption of these UDGs especially because CSFN was not told that all input to these UDGs have a deadline of October 10, 2017 as it was just discovered today. For the Planning Commission to hear on this matter when there is not even sufficient time to get people’s input is wrong. In addition, the community meetings scheduled apparently out to October 10, 2017 and October 12, 2017 for the supervisorial district meetings makes it

apparent that neighborhood input is not welcomed as these dates are after the October 10, 2017 final date of input. These UDGs require vetting through substantial meaningful dialogue and responses which has not happened as each group is "interviewed" by Planning and no results are shared nor are the decisions to which they determine known as to what will go into the UDGs. Should CSFN think of more issues, we shall provide them as soon as possible.

Thank you for your attention to this matter and we look forward to a reply.

Sincerely,



George Wooding

cc: Jonas Ionin, Commissions Secretary
John Rahaim, Director
Scott Sanchez, Zoning Administrator
Elizabeth Watty, Assistant Director of Current Planning
Anne Brask, Planning Staff
Board of Supervisors
Clerk of the Board of Supervisors