

# FAR, FAR Away, in the Shadows War on Residential Housing

by George Wooding

On December 7, the San Francisco Planning Department will try to destroy all of the residential housing codes throughout the City that pertain to housing demolition.

If the new codes are approved, Planning will be allowing residential housing to be built almost twice as large as existing housing. You may soon be living in the shadow of your neighbor's home.

Housing speculators, developers, realtors, and contractors will make a fortune building larger homes next to smaller homes. Let's not forget 90% of Planning Department revenue comes from building permits.

Mayor Lee will be happy because he is hoping that the newly-modified homes will build additional units. This will help the mayor to build the 5,000 units annually that he has promised. The Mayor loves housing density.

The residential housing neighborhoods won't know what hit them.

Neighborhood streets will become unrecognizable, with larger "McMansion" homes replacing smaller homes.

Neighborhood character will be destroyed. Worse, the larger homes will be designated as "soft-cap" housing<sup>1</sup>. This will allow even larger homes to be built. For the sake of density, the City has declared war on residential housing.

Believe it or not, San Francisco claims to have almost no enforceable demolition codes. The Department of Building Inspection's (DBI) building codes are vague and subject to favoritism and interpretation. Neither Planning's or DBI's demolition codes are equitable to the public.

Many might remember that Mel Murphy, the former president of the DBI, had his house slide down Twin Peaks during a demolition/rebuild. The work on his steep slope appears to have been "dramatically different than the approved plan," according to a report by Department of Building Inspection chief Tom Hui. Hui found that Murphy "failed to follow and implement the approved plans and the sequence of construction" in his permit.

The Planning Department is not inept when it comes to enforcing its own demolition guidelines. Planning<sup>2</sup> is telling the public that Planning Code section 317 has to eliminate "Tantamount to Demolition" (TTD) and replace it with "Residential Expansion Thresholds" (RET). These building thresholds will determine whether or not a building is a "demolition" based on how much of the existing structure is retained through a major alteration.

With minor modifications and enforcement, Planning's current TTD demolition guidelines will work fine. The proposed thresholds are not much of a limit and, in fact, are an incentive to demolish and build bigger structures to gain more dollars for more square feet

What Planning is really trying to do with the RET is to enlarge residential homes and create density in neighborhoods throughout the City by creating Floor Area Ratios (FAR). FAR is the ratio of a building's total floor area to the size of the lot upon which it is built. These are the FAR numbers that Planning has selected. They are supposed to represent citywide averages of each type of residential zoning.

The definition of demolition is a necessary part of the Planning Code. Without it, the only definition to control demolitions is the one defined by DBI, which is as broad as tearing down an entire building to the ground. With no demolition definition, the older, more affordable housing stock will be at risk of replacement with luxury housing that is the least affordable to average families. And with no demolition definition, the great majority of tenant-occupied residential buildings will be at risk of being demolished and replaced with bigger and less affordable dwellings. The demolition risk to these buildings is obviously a *displacement* risk to tenants who occupy them.

The proposed thresholds are an incentive to demolish and build bigger structures for developers to gain additional profit

by building more square footage.

[FAR Trigger/Unit Graphic Here]

For example, if your neighbor has a RH-1(D) lot of 2,500 square feet, they will be able to build 1.2 times that:  $2,500 \times 1.2 = 3,000$  square feet, plus 750 square feet for an accessory Dwelling unit (ADU). This will increase the unit size by 1,250 square feet.

The owner of a RH-1 lot of 2,500 square feet, will be able to increase their square footage by 1.4 times that:  $2,500 \times 1.4 = 3,500$  square feet, plus 750 square feet for an ADU. This will increase the unit size by 1,750 square feet.

The owner of a RH-2 lot of 2,500 square feet can increase the total square footage of the unit to 5,250 square feet, and an owner of a RH-3 lot of 2,500 feet as a triplex can increase the total square footage of the unit by 7,250 square feet.

The Planning Department staff's data in support of their proposed FAR "trigger" limits is non-existent. Planning was "Sunshined" by this reporter and asked for documents relevant to the RET and FAR programs. Analysis of the data discredited FAR averages. In fact, over 100,000 rows of data provided under a records request and extracted for RH zoning districts shows the *opposite* of what the staff claims. Currently, the great majority of RH homes in all districts and all neighborhoods, including duplexes and triplexes, are only half to one-third as large as the limits the Planning Department is proposing.

Planning was using its extremely over-inflated FAR threshold numbers so that the average FAR numbers would be much higher than actual figures. These averages were automatically selected, possibly using Global Information System (GIS) software. GIS systems capture, manipulate, analyze, and present all types of geographical data. The involved planners were Brittany Bendix, Audrey Butkus, Elizabeth Watty, and Maya Small.

Here is the copy of an August 1, 2017 email that GIS mapping data expert Paolo Ikezoe sent to Brittany Bendix: "*Hey Brittany, Good news ... I think I did it already! Bad news is I don't have write access to the BOS section of the "I" drive. So I made a folder in the GIS section here: I:\GIS\Citywide\projects\city\20170801\_FAR\_for\_RET. I'm also attaching a super drafty map showing FAR, measured as building square footage (from the Assessor) divided by parcel area. The thresholds you see (0 - 0.75, 0.75 - 1.25, etc.) were automatically chosen by the GIS software. We can tweak these based on what figures we're considering for the legislation.*"

Reasonable people have to wonder just how much "tweaking" went on at Planning while drafting proposed legislation!

The Planning Department was shaping residential housing data for its own purposes. The goal was to build the largest homes possible and hopefully increase each home's density. Additionally, there was little to no public transparency or meetings that included regular citizens, because Planning felt that its real constituencies were developers and architects.

Records obtained through the Sunshine requests show that the great majority of all dwellings in all districts have a FAR under 1.0. To be exact, there are 94,196 homes on the spreadsheet Planning provided that have a FAR of less than 1.0. That is why the threshold ranges chosen for the FAR map don't reflect the reality on the ground. Choosing a range of FAR's between .75 to 1.25 ignores the fact that 86% of homes in the RH zoning districts have a FAR of under 1.0. That is to say, the Planning Department's FAR map bundled the vast majority of homes in San Francisco with a tiny minority that have a much larger FAR.

To get an accurate picture of existing FAR's in San Francisco, we need to define more granular threshold ranges, such as the following: 0.0 to 0.55, .055 to .085, 0.85 to .99, and 0.99 to 1.25.

According to data analyst Ozzie Rohm:

"99% of all RH-1 homes in Twin Peaks are under 0.69 FAR. For RH-1(D) homes, we have 58% that are under 0.69 FAR. So RH-1(D) homes are slightly larger but still, the majority of RH-1(D) homes are under 0.99 FAR.

## **Twin Peaks**

There are a total of 934 RH-1 and RH-1(D) homes in Twin Peaks neighborhood and they make up 5% of all homes in District 7.

### **RH-1 Homes**

There are 816 RH-1 homes, or 87% of all RH dwellings in Twin Peaks.

- 806 homes fall between the FAR's of 0.08 and 0.69 – 99%
- 9 homes fall between the FAR's of 0.70 and 0.99 – 1%
- There's *only* one home above the FAR of 0.99, and that is at 51 Mountview with a FAR of 1.97.

The largest concentration of RH-1 homes is in the FAR range of 0.08 to 0.69.

### **RH-1(D) Homes**

There are 118 RH-1(D) homes, or 13% of all RH dwellings in Twin Peaks.

- 69 homes fall between the FAR's of 0.23 and 0.69 – 58%
- 28 homes fall between the FAR's of 0.70 and 0.99 – 24%
- 14 homes fall between the FAR's of 1.0 and 1.24 – 12%
- 6 homes fall between the FAR's of 1.25 and 1.49 – 5%
- There's *only* one home above the FAR of 1.49, and that is at 67 Clarendon with a FAR of 1.75.

The largest concentration of RH-1(D) homes is in the FAR range of 0.23 to 0.69.”

The “one size fits all” FAR's do not address the need for a contextual, granular FAR based on thorough research and analysis of a large sample size of homes within different parts of the City.

Citizen activist, Matt McCabe summarizes why he is against Planning's proposed RET Proposal:

*“No control over demolitions. Period. Create ‘Wild West’ expansions in the RH-1, -2, and -3 zones, and virtually unlimited expansions in other zones. Less affordable housing. More tenant displacement. More luxury housing that our City can ill afford. A homogenization of design across the City. Loss of unique neighborhood character and scale. A major ‘shushing’ of citizen input. And a reduction of work for the Planning Department.”*

Please come to the December 7 Planning Commission meeting, room 400, City Hall to voice your opposition against the Planning Department's failed attempt to replace its current demolition guidelines with a density plan that will ruin your neighborhood's character, and may exile you into the shadows from your neighbor's “*McMansion*” home. The open season on the destruction of existing residential housing stock must be stopped. Let's kill this proposal.

*George Wooding is president of the Coalition for San Francisco Neighborhoods (CSFN).*

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<sup>1</sup> “Soft-cap” housing refers to a zoning exemption allowing the Planning Department to unilaterally increase density of a building.

<sup>2</sup> The Planning Department claims “Tantamount to Demolition” (TTD) hasn't preserved “relatively affordable housing,” adds significant time to the process, results in uncertain processes, often results in “awkward” designs, is a regulation that few people understand, and hasn't preserved neighborhood character. Planning claims it must be replaced with a new “results-oriented” policy (RET, a.k.a. FAR). Actually, there is nothing wrong with the current TTD guidelines; they just haven't been enforced by the Planning Department.