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**Prepared April 2, 2026 for April 16, 2026 Hearing**

**To:** Commissioners and Interested Persons

**From:** Dan Carl, North Central Coast District Director
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**Subject: City and County of San Francisco LCP Amendment Number LCP-2-SNF-26-0004-1 (Housing Update)**

## SUMMARY OF STAFF RECOMMENDATION

The City and County of San Francisco ("the City") proposes to amend their certified Local Coastal Program (LCP) in two parts (an amendment to the Land Use Plan (LUP) and an amendment to the Implementation Plan (IP)), where the proposed changes are intended to facilitate new infill residential development with an emphasis on increased density and affordable housing. The proposed amendment is in part a result of the City's response to its Regional Housing Needs Allocation (RHNA) assessment, under which the City is required to accommodate an additional 36,200 housing units citywide by 2032. Although the coastal zone is relatively small in relation to the overall city, it still contains important areas where such units could be appropriately accommodated, and thus the City proposes to establish new LCP provisions that would enable increased residential density and affordable housing, as well as the overall housing supply, in certain parts of the coastal zone. The City estimates that the proposed LCP changes would facilitate approximately 720 new housing units (with at least 15% deed restricted as affordable housing) for parcels fully within the coastal zone boundary (and up to 1,200 new housing units when parcels partially bisected by the coastal zone boundary are considered).

For the proposed LUP amendment, the City proposes to update the LUP with two high-level policies focused on allowing increased housing density and infill development in the coastal zone portions of the Sunset and Richmond Districts of the City. For the proposed IP amendment, the City proposes to add a new section to the IP that would provide development standards necessary to achieve such infill development. More specifically, the proposed IP amendment would: increase certain height limits near transit-rich areas and commercial corridors; increase allowable density for both single-family and multi-family residential projects; establish a local density bonus program; encourage transit-oriented development; and continue to include requirements that such infill development be compatible with area character. Overall, the proposed LCP changes seek to accommodate residential development in an already urbanized

environment able to accommodate it, with an emphasis on higher densities and affordable housing.

The amendment also recognizes that many larger residential projects now rely on State Density Bonus Law (DBL) for deviations from local rules, all intended to incentivize housing projects. In response, the City proposes its own version of density bonus via its proposed "Housing Choice" program, which serves as a voluntary alternative[1] to DBL for housing developers seeking to avail themselves of a different set of incentives. The City's Housing Choice program encourages increased residential density and affordable housing and creates clear parameters and development standards for allowable heights, depending on density, use, and location. In particular, the City targets transit-rich areas for increased densities and affordable housing, with the intention being to expand housing supply in these areas while also seeking to expand and improve transit access.

Overall, the primary proposed changes are with respect to allowed heights, where maximums will increase in some areas (e.g., going from 40 to 50 feet base height at Judah Street, and from 40 to 55 feet base height at Sloat Boulevard). In addition, those new maximum heights can also be increased if a project meets the Housing Choice criteria,[2] with the largest allowed increases on Judah Street and Sloat Boulevard.[3] The proposed height increases would generally be smaller for sites closer to the coast, particularly for the developed area closest to Sunset Dunes Park and Ocean Beach, with taller allowances only permitted as development extends inland, all intended to keep development in the area nearest the shoreline relatively lower than more inland areas.

Thus, the City envisions an increase in building size and housing densities to accommodate more housing, with incentives to make as much of it affordable as possible. Because the areas where such development would be accommodated are already fairly densely developed, these types of proposed changes should not lead to any sort of significant adverse impacts to ESHA, wetlands, dunes, beaches, and other such coastal resources, rather it appears that the main potential issue areas would be in relation to public views and coastal character from larger buildings, and in relation to public access from denser development that could increase on-street parking demand. In terms of the former, while it is true that larger buildings will change the coastal viewshed, it is also true that such development would be inland of the prime coastal views at the immediate shoreline, and would be seen against the backdrop of the already developed and urban Sunset and Richmond Districts of the City extending out of the coastal zone. Staff does not believe that these types of changes raise significant coastal resource concerns, and in fact represent the type of infill densification that is

[1] Under the proposal a housing developer can choose to apply DBL or Housing Choice, but not both.

[2] To qualify for Housing Choice incentives, a project must be located in the IP's "R-4 Height and Bulk" zoning district.

[3] A 100% affordable housing project on Judah Street (one block inland from Sunset Dunes Park) meeting all other Housing Choice criteria would be able to extend from a base LCP-allowed maximum of 50 feet up to 115 feet. On Sloat Boulevard, a similar type of project would be able to extend from a base LCP-allowed maximum of 55 feet up to 130 feet.

necessary if development is to be clustered within developed areas able to accommodate it, as directed by the Coastal Act.

As to the potential for public access impacts stemming from parking supply/demand incongruities, staff notes that the proposed densification is directed at areas with significant transit options, and the City envisions the program being paired with transit improvements as well as site-specific transportation demand management (TDM) programs. When also coupled with the larger public parking areas at the Great Highway fronting Golden Gate Park and along Sloat Boulevard, and a fairly large supply of on-street parking otherwise, it appears that the changes should not themselves lead to any sort of significant new public access impacts of this sort, and that public access would not be significantly affected, as also directed by the Coastal Act.

In sum, the City's proposal will enable its coastal zone housing goals – and particularly affordable housing goals – while still protecting coastal resources, and staff recommends that the Commission approve the proposed LCP amendment as submitted. The motion to do so is found below on **page 5** below.

**Staff Note: LCP Amendment Action Deadline**

This proposed LCP amendment was filed as complete on March 6, 2026. The proposed amendment affects both the LCP's LUP and IP components, and the 90-working-day action deadline is July 15, 2026. Thus, unless the Commission extends the action deadline (it may be extended by up to one year), the Commission has until July 15, 2026 (i.e., no later than the Commission's July 2026 meeting) to take a final action on this LCP amendment.

Therefore, if the Commission fails to take a final action in this case (e.g., if the Commission instead chooses to postpone/continue LCP amendment consideration), then staff recommends that, as part of such non-final action, the Commission extend the deadline for final Commission action on the proposed amendment by one year. To do so, staff recommends a YES vote on the motion below. Passage of the motion will result in a new deadline for final Commission action on the proposed LCP amendment. The motion passes only by an affirmative vote of a majority of the Commissioners present.

> ***Time Extension Motion:*** *I move that the Commission extend the time limit to act on City and County of San Francisco Local Coastal Program Amendment Number LCP-2-SNF-26-0004-1 to July 15, 2027 and I recommend a yes vote.*

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Exhibit 1: San Francisco Coastal Zone Map
Exhibit 2: San Francisco Coastal Zone Photos
Exhibit 3: Proposed LCP Amendments
Exhibit 4: Map Showing Proposed Height and Zoning Changes

# 1. MOTION AND RESOLUTION

Staff recommends that the Commission, after public hearing, certify the proposed LCP amendment as submitted. Because there are both LUP and IP portions of the proposed amendment, and because they require individual actions in each case, the Commission needs to make two motions in order to act on this recommendation.

**A. Certify the LUP Amendment as Submitted**

Staff recommends a **YES** vote on the motion below. Passage of this motion will result in certification of the Land Use Plan portion of the amendment as submitted and adoption of the following resolution and findings. The motion passes only by an affirmative vote of a majority of the Commissioners present.

***Motion to Approve LUP Amendment:*** *I move that the Commission certify the Land Use Plan portion of LCP Amendment LCP-2-SNF-26-0004-1 as submitted by the City and County of San Francisco, and I recommend a* ***yes*** *vote.*

***Resolution to Certify:*** *The Commission hereby certifies the Land Use Plan portion of LCP Amendment LCP-2-SNF-26-0004-1 as submitted by City and County of San Francisco and adopts the findings set forth below on the grounds that this portion of the Amendment conforms with the policies of Chapter 3 of the Coastal Act. Certification of this portion of the Amendment complies with the California Environmental Quality Act, because either 1) feasible mitigation measures and/or alternatives have been incorporated to substantially lessen any significant adverse effects of this portion of the Amendment on the environment, or 2) there are no further feasible alternatives or mitigation measures that would substantially lessen any significant adverse impact which this portion of the Amendment may have on the environment.*

**B. Certify the IP Amendment as Submitted**

Staff recommends a **NO** vote on the motion below. Failure of this motion will result in certification of the Implementation Plan portion of the amendment as submitted and adoption of the following resolution and findings. The motion passes only by an affirmative vote of a majority of the Commissioners present.

***Motion:*** *I move that the Commission reject the Implementation Plan portion of LCP Amendment Number LCP-2-SNF-26-0004-1 as submitted by the City and County of San Francisco, and I recommend a* ***no*** *vote.*

***Resolution to Certify:*** *The Commission hereby certifies the Implementation Plan portion of LCP Amendment LCP-2-SNF-26-0004-1 for the City and County of San Francisco and adopts the findings set forth below on grounds that the amended Implementation Plan conforms with the provisions of the certified City and County of San Francisco Land Use Plan. Certification of the amendment complies with the California Environmental Quality Act, because either 1) feasible mitigation measures and/or alternatives have been incorporated to substantially lessen any significant adverse effects of the Amendment on the environment, or 2) there are no further feasible alternatives or mitigation measures that would*

*substantially lessen any significant adverse impacts on the environment that will result from certification of the Amendment.*

# 2. FINDINGS AND DECLARATIONS

## A. San Francisco Coastal Zone Background

The City and County of San Francisco ("the City") is located at the mouth of the San Francisco Bay roughly at the midpoint of the State's shoreline, bordering on Marin County across the iconic Golden Gate Bridge to the north, and San Mateo County to the south. The City occupies over 40 square miles and includes over 800,000 residents, all on the tip of the peninsula framed by the Pacific Ocean on one side, and the San Franciso Bay on two other sides. The City is one of the most popular visitor destinations in the world, where tourists come to see its many famous sites and attractions (e.g., the Golden Gate Bridge, Golden Gate Park, Coit Tower, Alcatraz Island, the Presidio, Fisherman's Wharf, San Francisco Zoo, cable-cars, Land's End, etc.) as well as its well-known neighborhoods and coastal/bay setting overall. On the western side of the City lies the City's coastal zone, stretching from roughly the City's Sea Cliff area and Land's End through Ocean Beach (nearly 4 miles long) and then Funston Beach fronting Fort Funston at the City's southern limit. The area directly inland of the immediate shoreline is mostly fronted by the Great Highway and Sunset Dunes Park, a two-mile stretch of the Upper Great Highway that is a car-free zone for pedestrians, cyclists, recreational activities, and community events. Inland of that lies the Golden Gate Park sandwiched between the City's Sunset (to the south) and Richmond (to the north) Districts, and the Lake Merced area inland of Fort Funston.

Approximately 90% of San Francisco's coastal zone is public and open space areas, with the vast majority being comprised of parks, beaches, and other public spaces. The more developed portion of the coastal zone is found in the fairly urban residential and commercial Sunset and Richmond Districts, which are really the focus of this amendment, but commercial and residential development is also scattered throughout the areas surrounding the San Francisco Zoo, Fort Funston, and Lake Merced, near the inland edge of the coastal zone boundary.

See **Exhibit 1** for a map showing the City's regional location, and the location of the City's coastal zone, and see **Exhibit 2** for photos that give a sense of the City's shoreline area.

## B. Existing LCP Background

The City first prepared its Local Coastal Program (LCP), comprised of the Western Shoreline Area Plan as its Land Use Plan (LUP) and certain implementing policies of the City's Planning Code as its Implementation Plan (IP), in the early 1980s, and the Coastal Commission originally certified the City's LCP on March 14, 1986. There have been only two LCP amendments since that time, with the first being in May 2018 focused specifically on adding a "Coastal Hazards" chapter into the LUP; and the second in July 2024 to make changes to the IP to both clarify appealable projects and to help facilitate the development of the Irish Cultural Center off of Sloat Boulevard. Thus, this current LCP amendment is the City's third amendment since the Commission

originally certified it four decades ago, and the first proposed major update to housing and zoning policies in the residential and commercial portions of the City's coastal zone.

### C. Proposed LCP Amendment

The City proposes to amend its certified LCP in order to accommodate policies in the coastal zone intended to carry out the City's Regional Housing Needs Allocation (RHNA) goals identified in the City's 2022 Housing Element, where the overall City effort to accommodate such development is locally referred to as the "Family Zoning Plan."[4] Specifically, the City's Housing Element commits the City to accommodating 36,200 additional housing units by 2032 in order to meet state Housing and Community Development Department (HCD) RHNA requirements. There are currently 3,766 residential units in the coastal zone, more than 80% in multifamily settings,[5] and the City estimates that the proposed LCP changes would facilitate approximately 720 new housing units (with at least 15% deed restricted as affordable housing) for parcels fully within the coastal zone boundary (and up to 1,200 new housing units when parcels partially bisected by the coastal zone boundary are considered).[6]

To carry out the Family Zoning Plan in the coastal zone, the City first proposes to update the LCP Land Use Plan (LUP) with two high-level policies focused on increased housing density and infill development in the Richmond and Sunset Districts.[7] Specifically, the objective and one of the policies for the LUP section that covers those areas would be modified as follows:[8]

> *Objective 11. ~~Preserve the scale of residential and commercial development along the coastal zone area.~~ Ensure development in the coastal zone advances housing and community development goals appropriate for the location of each parcel.*
>
> *Policy 11.1. ~~Preserve the scale and character of existing residential neighborhoods by setting allowable densities at the density generally prevailing~~*

[4] The Family Zoning Plan applies city-wide and is already in effect outside the coastal zone after being adopted by the City in December 2025.

[5] There are 1,004 units in the Richmond District (just north of Golden Gate Park), 1,638 units in the Sunset District (south of Golden Gate Park and north of Sloat Boulevard), and 1,124 units south of Sloat Boulevard (mostly well inland from the coast, in the area surrounding Lake Merced). According to the City, more than 80% of residential units in the coastal zone are in multi-family buildings, where this can largely be attributed to the fact that the Lakewood Apartments (at 511 John Muir Drive, between Fort Funston and Lake Merced) have more multi-family residential units (720 units) than all the single-family homes in the coastal zone combined (698 units).

[6] The coastal zone represents roughly 4% of the City's land area, and 1,200 units (of the 36,200 total additional units identified) would equate to 3.3% of additional units needed to meet City RHNA goals.

[7] Where these districts were identified as "well-resourced" neighborhoods capable of supporting additional housing supply in the City's 2022 Housing Element.

[8] Note that the existing LUP includes eleven numbered sections, each with a numbered objective and a series of numbered policies. However, although each objective has its own number (e.g., for Section 11, the objective is LUP Objective 11), the underlying policies do not, and are numbered 1, 2, 3 etc. in each section. To avoid confusion between these policies, this report uses the section numbering to also distinguish the policies (e.g., LUP Section 11 Policy 1 is referred to as LUP Policy 11.1).

*~~in the area and regulating new development so its appearance is compatible with adjacent buildings.~~ Consider the location of each parcel relative to both the city context, including major commercial and transit corridors, as well as the coast, when establishing standards for the form, design, and use of new development.*

Second, the City proposes adding a new section to the LCP IP that would provide the development standards necessary to achieve such infill development. Specifically, the proposed IP amendment would: increase certain height limits near transit-rich areas and commercial corridors; increase allowable density for both single-family and multi-family residential projects; establish a local density bonus program; encourage transit-oriented development; and continue to include requirements that such infill development be consistent with area character. Overall, the proposed LCP changes seek to accommodate residential development in an already urbanized environment able to accommodate it, with an emphasis on higher densities and affordable housing.

The proposed IP amendments would mostly modify development controls in the westernmost coastal zone portions of the Sunset and Richmond Districts. These districts are fairly densely developed urban areas that are mostly residential with moderate amounts of commercial and visitor-serving uses. These areas are currently designated under the IP for residential and commercial uses, and these zoning designations would be predominantly unchanged, albeit higher densities would be allowed as proposed. The proposed LCP amendments do not modify any standards applicable to public and open space areas (e.g., Golden Gate Park, Ocean Beach, etc.), and do not allow their conversion to other uses.

Thus, the City envisions an increase in building size and housing densities to accommodate more housing, with incentives to make as much of it affordable as possible. Because the areas where such development would be accommodated are already fairly densely developed, the City asserts these types of proposed changes should not lead to any sort of significant adverse impacts to ESHA, wetlands, dunes and other such coastal resources, rather it appears that the main potential issue areas would be in relation to public views and coastal character from larger buildings, and in relation to public access from denser development that could increase on-street parking demand. In terms of the latter, the proposed LCP amendments do not establish minimum parking requirements for new development, nor are there such requirements in the LCP currently. Instead, the IP would require transportation demand management (TDM) programs with the intention of mitigating impacts to public parking by encouraging non-automotive modes (such as public transit, cycling, and walking) on a project-level basis.

Overall, the main changes proposed are with respect to increased allowed densities and heights, where maximums will increase in some areas (e.g., going from 40 to 50 feet base height at Judah Street, and from 40 to 55 feet at Sloat Boulevard). Those new maximum heights can also be increased under certain circumstances if a project is located in the IP's R-4 Height and Bulk district (see also below). The proposed height increases would generally be smaller for sites closer to the coast, particularly for the developed area closest to Sunset Dunes Park and Ocean Beach, with taller allowances

only permitted as development extends inland, all intended to keep development in the area nearest the shoreline relatively lower than more inland areas.

The amendment also recognizes that many larger residential projects now rely on State Density Bonus Law (DBL)[9] for deviations to local rules, all intended to incentivize housing projects. In response, the City here proposes its own version of that type of density bonus via its proposed "Housing Choice" program, which serves as a voluntary alternative[10] to DBL for housing developers seeking to avail themselves of a different set of incentives. To qualify for the Housing Choice program, a project must be located in the IP's "R-4 Height and Bulk" zoning district,[11] and must not demolish 3 or more rent controlled units. Once qualified, the Housing Choice program allows for:

- Increases in allowed heights above the IP maximums described above, where the amount of increase is tied to the amount of affordable housing provided (where the

[9] The State's Density Bonus Law is codified in Government Code Section 65915 et seq. State DBL allows market-rate residential development projects to exceed local development standards in exchange for incorporating a certain amount of affordable residential units for specific socio-economic demographics into the project. DBL grants exceptions to density and other quantitative development standards (e.g., height, FAR, setbacks, etc.) for development projects that include affordable residential units for moderate-, lower-, and very-low-income residents; transitional foster youth; disabled veterans; unhoused persons; senior housing; and college students receiving financial aid. Local governments are required to grant a "density bonus," which is an exceedance of the otherwise allowable project density and other numerical zoning standards, if a housing project includes affordable units for one or more of these demographics with the density bonus calculated as a sliding scale based on the percentage of affordable units provided and the demographics targeted.

When any of these exceptions are requested by a developer, a local government is required to grant it "by right" (except in the coastal zone, see footnote 22) through a ministerial, administrative process unless the local government can affirmatively demonstrate that the exception would not result in a cost savings to the developer, would cause a public health or safety problem, would harm historical property, or would be contrary to law. Aside from these limited bases for denial, there is no cap on the number of development standard waivers that may be requested or granted. Thus, the local government, when reviewing development applications under State DBL, is limited in its ability to modify such proposals, including in terms of waivers or concessions. Along these same lines, the local government is generally not able to influence how a density bonus is incorporated into the design of a project; in other words, existing development allowances could be used to propose a building that is much taller than the current local height limits under state DBL. In addition, while state DBL includes a required percentage of affordable units, such requirements are based on the initial base project (i.e., before any bonus units are added) and are not mutually exclusive with local inclusionary requirements (i.e., affordable units meeting the state DBL requirement also count towards meeting the City's inclusionary requirement). This leads to projects utilizing State DBL with overall inclusionary (i.e., affordable) percentages of between 13-15% of the project's total units, below the City's standard 15% minimum inclusionary requirement.

[10] Under the proposal a housing developer can choose to apply DBL or Housing Choice, but not both.

[11] The R-4 Height and Bulk district is a residential district that generally applies inland of the Great Highway to 47th Street from Anza to Taraval (excepting the stretch between Fulton and Lincoln that constitutes the seaward-most sections of Golden Gate Park), with some additional areas at the intersection of Clement and 48th, inland to 46th Avenue for the stretch between Balboa and Fulton, and just inland of Lake Merced about one mile inland from the coast (see Exhibit 1).

largest increases are for 100% affordable projects),[12] with the largest of such allowed increases on Judah Street, Fulton Street, and Sloat Boulevard.[13]

- Increases in allowed rear yard lot coverage and allowed square footage for unique types of projects such as community benefit and family-friendly uses.
- Increases in allowed dwelling units, lot coverage, and specific other quantitative standards, up to 15% above standard IP requirements.
- Reductions in ground floor setbacks, open space requirements, and specific other quantitative standards, up to 15% below standard IP requirements.
- Meeting inclusionary/affordable requirements for projects with under 25 units via making every unit in a building rent controlled.

With respect to heights specifically, the Housing Choice program would increase otherwise allowed maximum height in each of the following areas:

- R-4 40-foot maximum height areas,[14] where qualifying projects would be allowed a height of up to 65 feet.
- R-4 50-foot maximum height areas,[15] where qualifying projects would be allowed a height of up to 85 feet.
- R-4 55-foot maximum height areas,[16] where qualifying projects would be allowed a height of up to 100 feet.
- Corner lots[17] and lots larger than 8,000 square feet, where qualifying projects would be allowed a height of up to 65 feet.

[12] Heights for 100% affordable housing projects qualify for a 20-foot increase, with up to an additional 10 total feet in other bonuses possible.

[13] A 100% affordable housing project on Judah Street (one block inland from Sunset Dunes Park) meeting all other Housing Choice criteria would be able to extend from a base LCP-allowed maximum of 50 feet up to 115 feet. On Sloat Boulevard, a similar type of project would be able to extend from a base LCP-allowed maximum of 55 feet up to 130 feet.

[14] Applicable to lots that are generally located along transit corridors in areas that are already densely developed. As proposed, these are the lots fronting Balboa between 46th and La Playa but not extending to the Great Highway; the lots along La Playa between Cabrillo and Fulton; and the lots fronting Lincoln, Irving, and Judah between 47th and 48th, but not extending to the Great Highway.

[15] Applicable to one lot fronting Cabrillo at La Playa, one block inland of the Great Highway; two lots fronting Judah between 47th and 48th; and along Brotherhood Way inland of San Francisco Golf Club.

[16] Applicable to the lots fronting Sloat Boulevard between 44th and the Great Highway.

[17] Defined as: "A lot bounded on two or more adjoining sides by streets that intersect adjacent to such lot, provided that the angle of intersection of such streets along such lot does not exceed 135 degrees. For the purposes of this Code, no Corner Lot shall be considered wider or deeper than 125 feet, and the remainder of any lot involved shall be considered to be an Interior Lot. Whenever a Corner Lot is re-subdivided, only that portion which thereafter is bounded on adjoining sides by streets as herein

In addition, projects qualifying for Housing Choice in two specific circumstances can also add additional height as follows:

- Residential projects that include historic building preservation can add up to 10 additional feet.[18]

- 100% affordable housing projects can add up to 20 additional feet above the initial height increase applied, up to a maximum of 30 additional feet in extra height under the program.[19]

Importantly, and as is the case with state DBL projects, the various deviations from LCP provisions that might be provided via the proposed Housing Choice program are in relation to what the LCP requires. In other words, the first step in the analysis of whether and to what extent potential Housing Choice deviations can be applied consistent with the LCP is to identify the base LCP consistent project for a site,[20] which extends to allowable uses as well as maximum allowed scale (e.g., in terms of height, square footage, lot coverage, setbacks, etc.), which is the same exercise for DBL.[21] It is only then that the City can consider any applicable deviations, and it is important that the differences between the LCP consistent project and any Housing Choice or DBL project are clearly identified so that the differences can be evaluated between the two projects, and whether those differences lead to an extra affordable housing benefit without any significant adverse coastal resource impact, whether a developer chooses DBL[22] or Housing Choice.

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described shall be a Corner Lot." There are roughly 70 such corner lots in the coastal zone, generally located near transit corridors.

[18] There are not currently any historic buildings in the coastal zone that allow for residential use.

[19] So, for Sloat Boulevard, for example, the base maximum allowed height of 55 feet could increase up to 100 feet by using the Housing Choice program and could add up to 30 additional feet if it was a 100% affordable housing project (resulting in a 130-foot maximum height).

[20] Here limited to LCP consistency and not the Coastal Act as all housing development would be located in the City's CDP jurisdiction and would not be located either (1) seaward of the first thorough public road and the sea where the Coastal Act's access and recreation provisions also apply, or (2) in the Commission's retained CDP jurisdiction.

[21] Where the LCP consistent project is essentially the maximum size, scale, density, and intensity of development that can be accommodated on a proposed project site consistent with all LCP requirements, and without applying any Housing Choice or DBL variations (e.g., incentives, concessions, waivers, density bonuses).

[22] As a means of harmonizing the Coastal Act and DBL, DBL includes what is often called out as a 'Coastal Act savings clause', which only allows the various DBL deviations if they are Coastal Act consistent. Specifically, Government Code Section 65915(m) states: "This section does not supersede or in any way alter or lessen the effect or application of the California Coastal Act of 1976 (Division 20 (commencing with Section 30000) of the Public Resources Code). Any density bonus, concessions, incentives, waivers or reductions of development standards, and parking ratios to which the applicant is entitled under this section shall be permitted in a manner that is consistent with this section and Division 20 (commencing with Section 30000) of the Public Resources Code." In practice, and herein, the Commission has typically found that in order to approve a DBL project that deviates from the Coastal Act and/or LCP consistent project for a site, the approving authority must conclude, based on substantial evidence, that (a) the approved project encourages housing opportunities for persons of low- and

See **Exhibit 3** for the text of the proposed LCP amendment (including both the LUP and IP components),[23] and see **Exhibit 4** for the map depicting the proposed height and zoning changes.

## D. Proposed LCP Amendment Consistency Determination

### 1. Standard of Review

The proposed amendment affects both the LUP and IP components of the certified LCP. The standard of review for LUP amendments is that they must conform with the requirements of Chapter 3 of the Coastal Act. The standard of review for IP amendments is that they must be consistent with and adequate to carry out LCP LUP provisions.

### 2. Proposed Land Use Plan Amendment

#### *Applicable Coastal Act Provisions*

Generally, the Coastal Act seeks to promote infill development within existing developed communities with adequate public services and where such development will not cause adverse impacts to coastal resources. The Coastal Act includes provisions to encourage infill development while ensuring protection of coastal resources such as environmentally sensitive habitat areas (ESHA), coastal waters and wetlands, scenic and visual qualities, and coastal character, to protect and encourage visitor-serving amenities, and to maximize public access to the coast, including as follows:

> ***Section 30210.*** *In carrying out the requirement of Section 4 of Article X of the California Constitution, maximum access, which shall be conspicuously posted, and recreational opportunities shall be provided for all the people consistent with public safety needs and the need to protect public rights, rights of private property owners, and natural resource areas from overuse.*

moderate-income with the least amount of Coastal Act and/or LCP deviation, as applicable; and (b) there will be no significant adverse coastal resource impacts due to the approved project.

[23] It is noted that the proposed LCP amendment text includes a variety of cross-references, primarily to non-LCP provisions. The City indicates that the City's Board of Supervisors only intended a subset of such cross-references to be a part of the City's proposed LCP amendment and has identified those via a table of contents (see page 3 of Exhibit 3), where the referenced sections are also included in Exhibit 3 (starting on page 7). As a result, all other cross-references and cross-referenced texts are not before the Commission in this proposed LCP amendment. The Commission notes that such a construct leads to certain textual idiosyncrasies where proposed LCP text includes a cross-reference to something that is not part of the amendment or ultimately the certified LCP, and the City indicates that such cross-references should simply be read as if not present. As an example, proposed Section 250(b) includes cross-references to Sections 172, 188, and 206 of the City's non-LCP code, none of which are before the Commission in the proposed amendment, and thus what is before the Commission in that section reads as (with the outside references ~~crossed out~~): "No building or structure or part thereof shall be permitted to exceed~~, except as stated in Sections 172, 188, and 206 of this Code,~~ the height and bulk limits set forth in this Article for the district in which it is located, including the height limits for use districts set forth in Section 261". While not ideal, the Commission understands the text as proposed in this way and evaluates it herein. The City has indicated that they will 'clean up' such cross-references in a future LCP amendment.

***Section 30211.*** *Development shall not interfere with the public's right of access to the sea where acquired through use or legislative authorization, including, but not limited to, the use of dry sand and rocky coastal beaches to the first line of terrestrial vegetation.*

***Section 30212.5.*** *Wherever appropriate and feasible, public facilities, including parking areas or facilities, shall be distributed throughout an area so as to mitigate against the impacts, social and otherwise, of overcrowding or overuse by the public of any single area.*

***Section 30213.*** *Lower cost visitor and recreational facilities shall be protected, encouraged, and, where feasible, provided. Developments providing public recreational opportunities are preferred…*

***Section 30231.*** *The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface waterflow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.*

***Section 30240.*** *(a) Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed within those areas. (b) Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade those areas, and shall be compatible with the continuance of those habitat and recreation areas.*

***Section 30250(a).*** *New residential, commercial, or industrial development, except as otherwise provided in this division, shall be located within, contiguous with, or in close proximity to, existing developed areas able to accommodate it or, where such areas are not able to accommodate it, in other areas with adequate public services and where it will not have significant adverse effects, either individually or cumulatively, on coastal resources…*

***Section 30251.*** *The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas. New development in highly scenic areas such as those designated in the California Coastline Preservation and Recreation Plan prepared by the Department of Parks and Recreation and by local government shall be subordinate to the character of its setting.*

> ***Section 30252.*** *The location and amount of new development should maintain and enhance public access to the coast by (1) facilitating the provision or extension of transit service, (2) providing commercial facilities within or adjoining residential development or in other areas that will minimize the use of coastal access roads, (3) providing nonautomobile circulation within the development, (4) providing adequate parking facilities or providing substitute means of serving the development with public transportation, (5) assuring the potential for public transit for high intensity uses such as high-rise office buildings, and by (6) assuring that the recreational needs of new residents will not overload nearby coastal recreation areas by correlating the amount of development with local park acquisition and development plans with the provision of onsite recreational facilities to serve the new development.*

In addition, while not part of Chapter 3, and thus not a legal standard of review for the proposed LUP changes, the Coastal Act requires that affordable housing be encouraged:

> ***Section 30604.*** *…(f) The Commission shall encourage housing opportunities for persons of low and moderate income….(g) The Legislature finds and declares that it is important for the commission to encourage the protection of existing and the provision of new affordable housing opportunities for persons of low and moderate income in the coastal zone.*

Thus, the Coastal Act requires protection and maximization of public recreational access opportunities,[24] minimization of impacts to such public recreational access areas and uses, and promotes recreational uses and access to the sea, particularly as it relates to free and lower cost such access, and including related to parking (see, for example, Sections 30210, 30211, 30212, 30212.5, and 30213). The Coastal Act also protects ESHA and coastal waters for habitat and other purposes (see, for example, Sections 30231 and 30240) and encourages certain transit and other measures be employed to enhance public access to the coast (Section 30252). The Coastal Act also provides that the scenic and visual qualities of coastal areas are resources of public importance that must be protected, that new development is required to protect public views and designed to be visually compatible with the surrounding area, and that development is required to be subordinate to the character of its setting in highly scenic areas (Section 30251).

With respect to housing, Section 30604(f) and (g) both require that affordable housing for persons of low- and moderate-income in the coastal zone be encouraged. Putting this together, the Commission has recognized the importance of providing/protecting deed restricted affordable housing and other more 'naturally occurring affordable

[24] Coastal Act Section 30210's direction to maximize public access and recreation opportunities represents a different threshold than to simply provide or protect such access, and it is fundamentally different from other similar provisions in this respect. In other words, it is not enough to simply provide public recreational access to and along the coast, and not enough to simply protect such access, rather such access must also be maximized. This terminology distinguishes the Coastal Act in certain respects and provides fundamental direction to maximize public recreational access opportunities with respect to LCP amendments that raise such issues.

housing' types such as ADUs and SB 9 housing.[25] The Commission has also sought to encourage housing that directly supports Coastal Act priority land uses, such as farmworker housing to support agricultural economies, and workforce housing to support hotel workers and those that support visitor-serving economies.[26] The result is that the Coastal Act divides housing into essentially two types: affordable/workforce housing that is directly protected and encouraged to provide for housing for lower- and moderate-income persons, particularly for those workers needed to support Coastal Act priority land uses in the coastal zone; and general market-rate housing, which is not so prioritized. That is not to say that general market-rate housing doesn't have importance,[27] but rather that it is subordinate to other types of housing and other types of uses specified in the Coastal Act. Put another way, general residential uses are not afforded the protections that these other housing types and uses are.

***Coastal Act Consistency Analysis***

The proposed LUP changes, while limited, do change the LUP materially as it affects the coastal zone portions of the Sunset and Richmond Districts. Specifically, whereas the existing LUP speaks to 'preserving the existing scale and character' of these areas, the two changes proposed would replace such language in its entirety, where the new language instead speaks to 'advancing housing and community development goals', albeit directing that occur relative to the context at any particular site (e.g., near major transit, etc.) (see proposed changes to LUP Objective 11 and Policy 11.1 earlier). The question before the Commission, however, is not whether the existing text should be retained in order to preserve existing scale/character, but whether what the City proposes is consistent with the Coastal Act in this regard. If it is not, the question extends to what sort of alternatives would potentially be required to make the text consistent, including but not limited to leaving the existing text alone.

The proposed LUP text would allow for corresponding IP changes that would allow for an increase in building size and housing densities as a means to accommodate more housing, with incentives to make as much of it affordable as possible. Thus, the core Coastal Act consistency question is whether and to what degree that type of LUP policy foundation could lead to significant adverse coastal resource concerns. Because the areas where such development would be accommodated is already fairly densely developed, these types of proposed changes should not lead to any sort of significant adverse impacts to ESHA, wetlands, dunes, and other such coastal resources and are therefore consistent with those policies, rather it appears that the main potential issue

[25] See, for example, City of Grover Beach LCP Amendment LCP-3-GRB-24-0009-1 (Short-Term Rentals).

[26] See, for example, Commission findings on this point in CDPs A-3-STC-24-0016 (Cruz Hotel) and A-3-PGR-22-0004 (American Tin Cannery Hotel), as well as LCP Amendment LCP-3-MCO-25-0034-1-Part A (Monterey County Accessory Dwelling Units).

[27] Indeed, the Commission notes the great public importance of a robust housing market. Housing is an essential public good, and it has a great importance in supporting the public health and welfare outside of a coastal resource/Coastal Act lens in terms of providing for stable shelter, of promoting generational wealth, of ensuring opportunities for a good education and access to safe neighborhoods, etc. This is why the Commission has made a concerted effort to increase housing stock in the coastal zone as much as possible when doing so does not result in adverse impacts to coastal resources.

areas would be in relation to public views and coastal character from creating the potential to develop larger buildings, and in relation to public access from denser development that could increase on-street parking demand.

In terms of views and character, Coastal Act Section 30251 requires the protection of scenic resources, including public views to and along the ocean and scenic coastal areas, and requires that new development be visually compatible with the character of surrounding areas. In this case, the area where development scale could increase is inland of the immediate shore in the already urbanized portion of the coastal zone, which leaves the most critical shoreline views (of and along the beach and ocean) untouched. Granted, while it is true that larger inland buildings would change the coastal viewshed overall, such development would be seen against the backdrop of the already developed and relatively urban Sunset and Richmond Districts of the City, with which it should appropriately blend. That is not to say that just any scale would appropriately protect views and character as directed by the Coastal Act, which points to the need for careful consideration of any subsequent IP changes (see IP analysis that follows), but rather represents that the proposed language does not raise significant Coastal Act visual concerns by itself. In fact, the proposed changes to LUP Objective 11 and Policy 11.1 speak to 'place-based' considerations, including explicitly related to the coast, "when establishing standards for the form, design, and use of new development," which provides specific direction to ensure that all of that is actually the case when proposed development is considered.

In terms of public access in general and public access parking specifically, the Coastal Act requires that public recreational access opportunities be maximized and protected, especially in terms of lower-cost and free opportunities. The Coastal Act also requires that new development contribute to maintaining and enhancing public access to the coast, including through utilizing transit and other modes to take pressure off circulation and parking demands. The City's coastal zone, including the coastal recreational areas adjacent to the western edge of the Sunset and Richmond Districts, are publicly owned and include publicly accessible beaches, parks, and other recreational visitor-serving facilities that are free to all residents and visitors alike. The public is also able to park for free on city streets to enjoy such areas as well. In addition, both the Richmond and Sunset Districts have several transit corridors with high-quality rail and bus lines that connect San Francisco's coastal zone to regional transit (such as MUNI and BART) and the rest of the City. Additionally, the Sunset and Richmond Districts themselves include several commercial corridors, both within and directly adjacent to the coastal zone, which include establishments which provide walkable services to residents and visitors, such as grocery stores, take-out food establishments, surf shops, cafes, and more. In addition, the 'place-based' considerations described above extend explicitly to location relative to major commercial and transit corridors. What's more, the established neighborhood street grid and sidewalks in the City's coastal zone are highly walkable and will remain so, even considering the proposed LUP amendments, thus continuing to provide residents and visitors with ample opportunity for public access, recreation, and "non-automobile circulation" (i.e., walking, cycling, etc.). All of this tempers concern that an increased intensity of use in these areas via the proposed LUP changes might lead to any sort of significant public access problems, including related to public parking.

Ultimately, Coastal Act Section 30250 directs development into "existing developed areas able to accommodate it", and the proposed changes do just that. While it will be critical that any proposed IP changes are evaluated carefully for coastal resource concerns (see IP evaluation that follows), it appears that the Sunset and Richmond District coastal zone areas in question meet that criteria (i.e., they are developed areas served by public services, including related to transit, that appear capable of handling additional intensity/density of use). In addition, the City's housing goals include providing for as much affordable housing as possible, and thus the proposed text should be understood in that context, where Sections 30604(f) and Section 30604(g) encourage the same thing. In short, the proposed LUP changes do not raise significant coastal resource concerns, and in fact speak to the type of infill densification that is necessary if development is to be clustered within developed areas able to accommodate it, as directed by the Coastal Act.

Thus, the Commission concludes that the proposed LUP amendment is consistent with Chapter 3 of the Coastal Act.

### 3. Proposed IP Amendment

#### *Applicable LUP Provisions*

The LUP (including the as now amended LUP Objective 11 and Policy 11.1) includes provisions designed to encourage infill development and housing for residents of all income levels (especially at low-income and moderate-income levels) in a context-specific way that considers the coast and its resources, the maintenance of a community business district along Sloat Boulevard, the improvement of public parking and transit opportunities to and along the coast, and developing the shoreline in a responsible manner (especially taking coastal hazards into account), including as follows:

> ***LUP Objective 1 (Transportation):*** *Improve public transit access to the coast.*
>
> ***LUP Policy 1.1:*** *Improve crosstown public transit connections to the coastal area, specifically Ocean Beach, the Zoo and the Cliff House.*
>
> ***LUP Policy 1.5:*** *Consolidate the Municipal Railway [a.k.a. MUNI] turnaround at the former Playland-at-the-Beach site.*
>
> ***LUP Policy 2.8:*** *Provide permanent parking for normal use required by beach users in the Great Highway corridor (taking into account the increased accessibility by transit); provide multiple use areas which could be used for parking at peak times, but could be used for recreational uses when not needed for parking.*
>
> ***LUP Objective 6 (Ocean Beach):*** *Maintain and enhance the recreational use of San Francisco's Ocean Beach shoreline.*
>
> ***LUP Policy 6.1:*** *Continue Ocean Beach as a natural beach area for public recreation.*

***LUP Objective 11 (Richmond and Sunset Residential Neighborhoods) [as amended]:*** *Ensure development in the coastal zone advances housing and community development goals appropriate for the location of each parcel.*

***LUP Policy 11.1 [as amended]:*** *Consider the location of each parcel relative to both the city context, including major commercial and transit corridors, as well as the coast, when establishing standards for the form, design, and use of new development.*

***LUP Policy 11.2:*** *Develop the former Playland-at-the-Beach site as a moderate density residential apartment development with neighborhood commercial uses to serve the residential community and, to a limited extent, visitors to the Golden Gate National Recreational Area.*

***LUP Policy 11.3:*** *Continue the enforcement of citywide housing policies, ordinances and standards regarding the provision of safe and convenient housing to residents of all income levels, especially low- and moderate-income people.*

***LUP Policy 11.4:*** *Strive to increase the amount of housing units citywide, especially units for low- and moderate-income people.*

***LUP Policy 11.7:*** *Maintain a community business district along Sloat Boulevard within the Coastal Zone to provide goods and services to residents of the outer Sunset and visitors to the Zoo and Ocean Beach.*

***LUP Policy 12.4:*** *Develop the shoreline in a responsible manner…*

***LUP Consistency Analysis***

General

The proposed IP amendment would add a new section to the IP establishing new housing and zoning provisions in the coastal zone that would: increase certain height limits near transit-rich areas and commercial corridors; increase allowable density for both single-family and multi-family residential projects; establish a local density bonus program; encourage transit-oriented development; and continue to include requirements that such infill development be consistent with area character. Overall, the proposed LCP changes seek to accommodate residential development in an already urbanized environment able to accommodate it, with an emphasis on higher densities and affordable housing.

The proposed IP amendments would mostly modify development controls in the westernmost coastal zone portions of the Sunset and Richmond Districts. These districts are densely developed urban areas that are mostly residential with moderate amounts of commercial and visitor-serving uses. These areas are currently designated under the IP for residential and commercial uses, and these zoning designations would be predominantly unchanged, albeit higher densities would be allowed as proposed. The proposed LCP amendments do not modify any standards applicable to public and

open space areas (e.g., Golden Gate Park, Ocean Beach, etc.), and do not allow their conversion to other uses.

Housing

The Commission has, in general, found that the allowance for increased densities can be an effective tool to provide for additional affordable and lower-income housing. To this end, LUP Policy 11.4 calls for an increase to the amount of housing units citywide, especially affordable housing for low-income and moderate-income people. LUP Objective 11 and Policy 11.1 seek specifically to advance housing goals in the Sunset and Richmond Districts, which represent essentially all of the urbanized residential and commercial areas in the City's coastal zone, and where such goals clearly include additional housing, and especially additional affordable housing. This approach (increasing residential density as a means of expanding the affordable housing supply) allows the City to increase the number of housing units in the coastal zone, increase the number of affordable housing units for lower-income and moderate-income households, and comply with state housing law while also being found consistent with the LUP.

Local and State Density Bonus Programs

It is important to recognize three key differences between state DBL and the City's Housing Choice local density bonus program. First, DBL can lead to a range of outcomes when applied since there is no limit to the number of LCP deviations that might be granted. While it is true that in the coastal zone such projects must be consistent with the Coastal Act and thus cannot lead to significant adverse coastal resource impacts, as described earlier (see footnote 22), there is little certainty what might be pursued in any particular project. The City's proposed Housing Choice program, on the other hand, identifies explicitly what standards might be allowed in any case, as described earlier. That means that specific potential outcomes can be evaluated now (in a broad way, as befits LCP analysis as opposed to project level analysis) as part of this IP amendment package. That means, for example, that maximum potential Housing Choice scale outcomes are known now, and can be evaluated now, before they are prescribed and applied as part of an LCP analysis of subsequent CDP applications. This provides for greater degree of certainty in potential Housing Choice outcomes.

Second, the Housing Choice provisions are not themselves LCP deviations in the way that DBL deviations are. Rather, by certifying them as part of the LCP, they are the LCP standards that apply in any particular case, provided the identified criteria are met. That means that when a project is in conformity with them, then that project is in conformity with the LCP on those points, even if the 'base' requirements are different.

Third, specifically for housing projects with under 25 units, the Housing Choice program allows developers to meet City inclusionary/affordable requirements by having every unit in the building be rent controlled. Pursuant to the affordable housing provisions of the LUP, this helps to encourage affordable housing by providing different pathways and options for developers to utilize. Importantly, the Housing Choice program would not be available for any project that would demolish 3 or more rent controlled units, thus seeking to encourage the protection of existing affordable housing supply.

Thus, the proposed IP amendment retains flexibility for developers to pursue DBL alone, or the City's Housing Choice program alone, or neither, as the circumstances dictate. In all such cases, the project would be required to be in conformance with all applicable LCP policies and standards and avoid significant adverse coastal resource impacts. All in all, the new proposed Housing Choice program represents an exciting opportunity to accommodate a range of housing, and particularly a range of infill housing below market rates, in a way that facilitates these projects differently than State DBL. The City has spent substantial effort and resources studying the question, including reaching out and coordinating with the development community and local stakeholders, as well as with HCD, where that outreach and collaboration culminated in the proposed Housing Choice program.

Habitat/ESHA

The proposed IP amendment would not enable increased development near to the ocean or the beach, nor would it enable new development in or near ESHA and other sensitive coastal resources. This is consistent with LUP Objective 6 and LUP Policies 6.1 and 12.4, which strive to maintain and (when feasible) improve coastal resource values along the Ocean Beach shoreline, and to only allow development on the shoreline that meets such tests. Therefore, by clustering new development in already developed areas, and not encroaching on more sensitive beach, ocean, open space, habitat, and ESHA, the proposed IP amendment can be found consistent with the LUP in terms of habitat and ESHA protections.

Public Views and Character

LUP Objective 11 requires that development in the coastal zone portions of the Sunset and Richmond Districts be appropriate for the site, considering site and surrounding contexts (including its relationship to transit and the shoreline itself), which LUP Policy 11.1 requires when "establishing standards for the form, design, and use of new development." An important part of the coastal context is its visual and scenic resources. LUP Objective 11 and Policy 11.1 therefore seek to advance housing and community development goals while also protecting public views and coastal zone character through identified standards that do just that.

The most obvious outcome of the proposed IP provisions is an increase in scale, particularly height, in certain coastal zone areas. In particular, the proposed height limit increases are specifically clustered in transit-rich areas and along commercial corridors, almost always more than one block from the coast. The main changes are to base heights, which will increase in some areas (e.g., going from 40 to 50 feet base height at Judah Street, and from 40 to 55 feet at Sloat Boulevard). Those new maximum base heights can also be increased if a project meets the Housing Choice criteria and pursues the Housing Choice program. The proposed height increases would generally be smaller for sites closer to the coast, particularly for the developed area closest to Sunset Dunes Park and Ocean Beach, with taller allowances only permitted as development extends inland, all intended to keep development in the area nearest the shoreline relatively lower than more inland areas. While it is true that larger buildings will change the coastal viewshed, it is also true that such development would be inland of the prime coastal views at the immediate shoreline and would be seen against the backdrop of the already developed and quite urbanized Sunset and Richmond Districts

of the City. As a result, these types of changes do not raise significant coastal resource concerns and are consistent with the LUP on these points.

At the same time, the Housing Choice program allows for heights to increase above those base heights in select areas, generally transit-rich areas and commercial corridors. In the Sunset District, from Wawona Street all the way north to Lincoln Way (approximately a two-mile stretch running along Sunset Dunes Park) the entire first blocks of houses closest to the coast would not be eligible for height increases under the Housing Choice program and would remain at their current 40-foot height limit. This will help to ensure that, visually, there will be a "step down" effect as things get closer to the coast. Put another way, taller buildings will be further inland, while shorter buildings will be closer to the coast. Thus, thus assuring that "step down" effect remains in place, generally preserving higher priority public views closer to the coast.

One commercial corridor in the Sunset District (Judah Street) would have base height limits increased from 40 feet to 50 feet. With the local Housing Choice bonus applied, this could take the maximum height limit up to 85 feet. If a project were to also utilize other bonuses, and the project were to also be 100% affordable, then the maximum additional bonuses could be 30 feet on top of the Housing Choice limit of 85 feet (so 115 feet absolute maximum). This is a substantial increase, more than double the current allowable height. At the same time, even 115-foot heights could likely be accommodated in that area without significant public view concern, including as the area redevelops over time to adjust to this new normal, and again because it is part of the urban visual backdrop when seen in the primary coastal views along Sunset Dunes Park and the more immediate shoreline.

On Sloat Boulevard, the City proposes to increase the base height limit along most of this area from 40 feet to 55 feet.[28] With the Housing Choice bonus applied, this would make the maximum height limit 100 feet along the Sloat Boulevard corridor across the street from the San Francisco Zoo. If the project also utilized other Housing Choice bonuses, and was 100% affordable on top of that, then the maximum additional bonuses would be 30 feet on top of the Housing Choice limit of 100 feet (so 130 feet absolute maximum). LUP Policy 11.7 requires that a community business district be maintained along Sloat Boulevard, which the City asserts such heights allowances will enable. Although the tallest structures in this area currently are five stories and about 60 feet tall (i.e., a residential apartment complex located about a block from the beach), the Sloat corridor is in a fairly urban, infill stretch of Sloat Boulevard inland of the beach

[28] The City asserts that the base maximum height along Sloat Boulevard has actually been 100 feet ever since the early 1970s, hence the City reasons that the base maximum height is actually decreasing from 100 feet to 55 feet. In support of this argument, the City points to its background position papers that were part of the LCP's supporting documentation, and maps from the City's non-LCP code showing this area to allow up to 100-foot heights, suggesting that it was an oversight that the LCP itself does not include the 100-foot maximum height. However, the current certified LCP says that the base maximum height along Sloat Boulevard is 40 feet.

where the increased allowed scale would not block any significant views and is unlikely to significantly adversely affect the character of the area.[29]

In the Richmond District, a similar dynamic to the Sunset is proposed, with the height potentially being increased to as high as 85 feet for certain parcels (only after application of the Housing Choice program). A couple dozen smaller parcels on Fulton Street (just north of Golden Gate Park), and one larger parcel on Cabrillo Street, would all be subject to a maximum height of 85 feet with the Housing Choice program applied. Similar to Judah Street, if the project were to also utilize other bonuses, and was also 100% affordable on top of that, then the maximum additional bonuses would be 30 feet on top of the Housing Choice limit of 85 feet (so up to 115 feet absolute maximum). None of these parcels are within close proximity to the more open, natural coastal areas where the policies dictate that public views are most important, nor are any of them generally within a block of the first public road. Here, as with the Sunset District, the intended visual effect is for the height of buildings to "step down" as they get closer to the coast, where increased scale would be seen from the shoreline area against the backdrop of the heavily developed urban context that exists well inland of the coastal zone.

Somewhat of an outlier is a potential development site at 999 Brotherhood Way, which is on the inland side of Lake Merced, and more than a mile inland from the coast. This already-developed parcel, that currently houses a church and associated non-residential buildings, parking lots and landscaping, has zoned capacity for a maximum of approximately 1,000 residential units for the entire parcel, approximately half of which is in the coastal zone, and half is not. This parcel is setback by more than 100 feet from the more open areas surrounding Lake Merced. Furthermore, given that this parcel is more than a mile inland from the coast, substantial impacts on public views (both from and towards the coast) or area character are not expected if the site is redeveloped under the Housing Choice allowances.

The proposed IP amendment would also increase density in Neighborhood Commercial zones (NC-1, NC-2, and NC-S) and reclassify certain properties as NC-2. It would also create the San Francisco Municipal Transportation Agency Special Use District (SFMTA-SUD), which would allow development of market-rate and affordable housing consistent with the surrounding zoning requirements on parcels owned by SFMTA which are currently used as parking lots. Consistent with the LUP (as amended), these zoning modifications would help to increase residential density and access to public transit in commercial corridors and transit-rich areas. These parcels are relatively inland, away from ESHA and other sensitive coastal resources, and the Commission

[29] The Commission also notes that in July 2024 the Commission approved LCP Amendment Number LCP-2-SNF-24-0024-1, which was intended to facilitate the approval of major renovations to the Irish Cultural Center (located along the Sloat corridor) which increased the allowable height limit to 100 feet. In that case the Commission found that a 100-foot maximum height would not cause substantial adverse impacts to coastal resources, including views and coastal character, largely due to the inland location and commercial character of this area, similar to findings here.

does not anticipate the potential development of them pursuant to the amended LCP to have any substantial negative impacts on public views and character.

The IP amendment also proposes to allow certain quantitative standards (such as dwelling unit mix, some ground floor setbacks, lot coverage, open space requirements, and other internal build standards) to be modified by up to 15% for any projects qualifying for Housing Choice. Like height adjustments under Housing Choice, these changes to standards would apply to projects in already developed, infill areas, and such standard adjustments would likely have limited effects on public views and character. This 15% modification allowance would not apply to minimum setback requirements for ESHA, wetlands, sandy beaches, coastal waters, and other coastal resources and habitats. Accordingly, the 15% minor adjustments tool for Housing Choice projects does not appear to raise any substantial public view or character concerns and is LUP consistent on these points.

Thus, the analysis above shows that at a planning level the IP changes proposed should not lead to significant adverse public view and character issues and thus is consistent with those LUP requirements. Importantly, however, that is not the only analysis that any such future projects must face, and in fact all proposed development would require a CDP that must be found consistent with the LCP, meaning that all proposed development will itself go through an LCP analysis that is 'place-based' and dependent on the context-specific facts of that particular case, where that analysis is the refined analysis that ensures that these planning level decisions are borne out, and that public views and character are protected as directed by the LCP.

For all the above reasons, the proposed IP amendment can be found consistent with and adequate to carry out the LUP with respect to public views and character.

Public Access, Recreation, and Transit

LUP Objective 1 requires the improvement of public transit access to the coast, while LUP Policy 1.1 calls for improvement of crosstown public transit connections to San Francisco's coastal zone. The encouragement of transit-oriented infill development, paired with improvements to public transit throughout San Francisco, including the coastal zone, are key components of the City's proposed IP amendments. The proposed IP amendments would allow and encourage increased residential densities throughout already built-out portions of western San Francisco, in existing walkable neighborhoods that are already served by high-quality public transit options, particularly along crosstown corridors (such as Judah Street and Fulton Street) which connect the coastal zone to the rest of the city. The IP amendments are consistent with LUP Objective 1 and related LUP policies since public transit can achieve greater ridership and cost-effectiveness by serving well-resourced areas with higher residential densities.

LUP Policy 1.5 calls for the consolidation of the former Playland-at-the-Beach site, which is now SFMTA's La Playa/Cabrillo Terminal Loop at 780 La Playa Street in the Richmond District. The proposed IP amendment would reclassify this site from Low Density Mixed Residential (RM-1) to the Neighborhood Commercial (NC-2) zoning district, thereby increasing the allowable height in addition to increasing allowable residential density. The site would therefore accommodate increased mixed-use

housing, while continuing to allow it to maintain and improve transit-related uses, consistent with LUP Policy 1.5 and LUP Objective 1 more broadly. Increases in public transit access are beneficial for coastal public access more broadly because they enable more people to more easily visit the coast, without requiring access to, and/or ownership of, a car.

LUP Policy 2.8 requires the provision of "permanent parking for normal use required by beach users in the Great Highway corridor" while also considering the increased accessibility by transit. The proposed IP amendment is not anticipated to have any substantial impacts on parking along the Great Highway corridor, most of all at the North Ocean Beach parking lot (immediately west of Golden Gate Park, and which continues to be an essential source for public access and free parking for visitors). Permanent parking for "normal use" (i.e., non-peak times) is available throughout the Great Highway corridor, more specifically at the North Ocean Beach parking lot, along La Playa Street and the Lower Great Highway, along Sloat Boulevard (immediately adjacent to the southeast of the Great Highway), in addition to ample free public parking near Balboa Street and Sutro Heights Park.

The residential parking provisions in the proposed IP amendment are primarily focused on siting infill development near transit corridors, rather than impacting parking along the Great Highway corridor, which is generally used for visitors to Ocean Beach, Sunset Dunes Park, and the Great Highway corridor more generally. The permanent public parking along the Great Highway corridor – particularly the free public parking in the North Ocean Beach area – will continue to provide and maintain ample opportunity for visitors to the coast traveling by car, in addition to the ample opportunities for public access/recreation via transit, cycling, walking, and other non-vehicular modes. In addition, the City's Transportation Demand Management (TDM) program is focused on reducing Vehicle Miles Traveled (VMT) by helping residents, tenants, employees, and visitors choose more sustainable travel options such as public transit, cycling, or walking. This city-wide TDM program is already implemented throughout the City and the City is now proposing implementation in the coastal zone, in an effort to encourage infill transit-oriented development, reduce VMT, and encourage non-automobile forms of transportation (as stipulated both by the Coastal Act and the City's LUP) as part of development considerations specific to any particular project. As discussed above, the LCP does not have specific off-street minimum parking standards in the coastal zone, and the proposed IP amendments do not change that, relying primarily on transit and TDM programs to address parking needs.[30]

In sum, the LUP requires that shoreline and Golden Gate Park public recreational access opportunities be protected, including in terms of making sure visitors can readily avail themselves of such opportunities, including via transit and parking. The City's coastal zone, including the coastal recreational areas adjacent to the western edge of the Sunset and Richmond Districts, are publicly owned and include publicly accessible beaches, parks, and other recreational visitor-serving facilities that are free to all

[30] Assembly Bill (AB) 2097 eliminates off-street parking requirements for most types of development located within one half mile of a major transit stop, which applies for the entirety of San Francisco's residential and commercial areas in the coastal zone, given its numerous bus stops and MUNI lines.

residents and visitors alike, and the same applies to the public roads in Golden Gate Park. The public is also able to park for free on city streets to enjoy such areas as well. Both the Richmond and Sunset Districts have several transit corridors with high-quality rail and bus lines that connect San Francisco's coastal zone to regional transit (such as MUNI and BART) and the rest of the City. Additionally, the Sunset and Richmond Districts themselves include several commercial corridors, both within and directly adjacent to the coastal zone, which include establishments which provide walkable services to residents and visitors, such as grocery stores, take-out food establishments, surf shops, cafes, and more. In addition, the 'place-based' considerations described above extend explicitly to locations relative to major commercial and transit corridors. The established neighborhood street grid and sidewalks in the City's coastal zone are highly walkable and will remain so, even considering the proposed IP amendments, thus continuing to provide residents and visitors with ample opportunity for public access, recreation, and "non-automobile circulation" (i.e. walking, cycling, etc.). Taken together, this tempers concern that an increased intensity of use in these areas via the proposed IP changes might lead to any sort of significant public access problems, including related to public parking.

For all the above reasons, the proposed IP amendment can be found consistent with and adequate to carry out the LUP with respect to public access, recreation, and transit.

Thus, and overall, the Commission concludes that the proposed IP amendment conforms with and is adequate to carry out the provisions of the LUP.

### 4. Conclusion

The City proposes a series of LCP changes that allow for an increase in building size and housing densities to accommodate more housing, with incentives to make as much of it affordable as possible. Because the areas where such development would be accommodated are already fairly densely developed, these types of proposed changes should not lead to any sort of significant adverse impacts to ESHA, wetlands, dunes, beaches, and other such coastal resources, rather it appears that the main potential issues would be in relation to public views and coastal character from allowances for larger buildings, and in relation to public access from denser development that could increase on-street parking demand. In terms of the former, while it is true that larger buildings will change the coastal viewshed, it is also true that such development would be well inland of the prime coastal views at the immediate shoreline and would be seen against the backdrop of the already developed and relatively urbanized Sunset and Richmond Districts of the City. In terms of the latter, the proposed densification is directed towards areas with significant transit options, and where at its core the City envisions the program being paired with transit improvements. When also coupled with the larger public parking areas at the Great Highway fronting Golden Gate Park and along Sloat Boulevard, and a fairly large supply of on-street parking otherwise, it appears that the changes should not themselves lead to any sort of significant new public access impacts related to on-street parking demands, and that public access would not be significantly affected, consistent with the Coastal Act. The Commission does not believe that these types of changes raise significant coastal resource concerns, and in fact represent the type of infill densification that is necessary if new

housing development is to be clustered within developed areas able to accommodate it, as directed by the Coastal Act.

In sum, the City's proposal will enable its coastal zong housing goals– and particularly affordable housing goals – while still protecting coastal resources, and the Commission approves the proposed LCP amendment as submitted.

### E. California Environmental Quality Act (CEQA)

CEQA Section 21080.5(d)(2)(A) prohibits a proposed LCP or LCP amendment from being approved if there are feasible alternatives and/or feasible mitigation measures available that would substantially lessen any significant adverse effect that the LCP or LCP amendment may have on the environment. Although local governments are not required to satisfy CEQA in terms of local preparation and adoption of LCPs and LCP amendments, many local governments use the CEQA process to develop information about proposed LCPs and LCP amendments, including to help facilitate Coastal Act review. In this case, the City adopted a Housing Element Environmental Impact Report (EIR) in 2022 under CEQA (applicable to the whole City, and not just the coastal zone) that found significant and unavoidable impacts (with respect to "reasonably foreseeable indirect changes" to the environment), and the City adopted a statement of overriding considerations (pursuant to CEQA Section 15091). The City subsequently adopted an addendum to the EIR in 2025, where that addendum determined that the 2025 Family Zoning Plan posed no new or substantially more severe impacts than were identified in the 2022 Housing Element EIR CEQA determination.

The Coastal Commission is not exempt from satisfying CEQA requirements with respect to LCPs and LCP amendments, but the Commission's LCP amendment review, approval, and certification process has been certified by the Secretary of the Natural Resources Agency as being the functional equivalent of the environmental review required by CEQA (CCR Section 15251(f)). Accordingly, in fulfilling that review, this report has discussed the relevant coastal resource issues with the proposal, has addressed all significant comments received, and has concluded that approval of the proposed LCP amendment is not expected to result in significant environmental effects, including as those terms are understood in CEQA.

Accordingly, it is unnecessary for the Commission to suggest modifications (including through alternatives and/or mitigation measures) as there are no significant adverse environmental effects that approval of the proposed amendment would necessitate. Thus, the proposed amendment will not result in any significant adverse environmental effects for which feasible mitigation measures have not been employed, consistent with CEQA Section 21080.5(d)(2)(A).

## 3. APPENDICES

### A. Substantive File Documents

- LCP Amendment File for LCP-2-SNF-26-0004-1
- SF Housing Element Environmental Impact Report

### B. Staff Contact with Agencies and Groups

- City and County of San Francisco Planning Department
- California Department of Housing and Community Development