

San Francisco Housing Element – State Comments and Implications for Japan Center Malls Blocks

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SF Housing Element and What State Wants

- San Francisco's Housing Element Draft contains City policies and actions on housing in the next 8 years (2023-2031).
- The State requires that the City adopt a compliant Housing Element by January 31, 2023.
- A compliant Housing Element must address the comments by the State to the State's satisfaction.
- The State wants to know how the City will produce 82,000 more housing units (its Regional Housing Needs Allocation or RHNA) by 2031.

State of California Housing & Community Development (HCD) letter

- ▶ The City sent its March 2022 draft Housing Element to the State for first round review.
- ▶ The State Housing & Community Development department (HCD) sent its comments on August 8, 2022.
- ▶ The City must submit a revised draft Housing Element by early October which responds to the State's comments.
- ▶ In order for the City to adopt its Housing Element, it must certify a Final EIR and approve the Housing Element and supporting documents.

What happens if City doesn't adopt State-compliant Housing Element?

- ▶ If City fails to adopt a compliant housing element within 120 days (or 4 months) of January 31, 2023, then any rezoning to accommodate the housing needed to meet its RHNA must be completed no later than January 31, 2024.
- ▶ If the City fails to adopt a compliant housing element by January 31, 2024, it will no longer be eligible for certain federal, state and regional funding programs.

State's Comments Call for Specifics

- State wants specifics on:
 - Sites to be developed with housing
 - Changes to zoning and processes to enable such development
 - Timelines and metrics for removing obstacles to producing more housing
- State wants the City to:
 - Identify, analyze and rezone specific candidate parcels to accommodate more housing, beyond the projects which have been approved but not yet built, or projects in the pipeline.
 - Show how it will ensure that the additional housing is built by 2031, by removing constraints.

Implications for Japan Center Malls Blocks

- SF Housing Element (March 2022) showed increased height limits on the Japan Center Malls blocks from 50' to 55' to 85', and removal of density limits.
- SF Housing Element EIR (April 2022) showed height limit increases to 240' on the Malls blocks and removal of density limits.
- If the City plans to upzone the Malls blocks to accommodate more housing, the State wants to know the development capacity, when the upzoning will occur, and how much new housing will occur by 2031.

Implications for Japan Center Malls blocks (cont.)

- ▶ If the City does not adopt a State compliant housing element by January 2023, it must complete all rezoning needed to accommodate more housing, including the Malls blocks, by January 2024.
- ▶ It must also show that it will remove constraints that impede housing development on the Malls blocks in time for the housing to be developed there by 2031.