

June 12, 2018

To: Planning Commission and the Board of Supervisors

Re: ADUa scheduled for June 21, 2018 at Planning Commission

Board of Supervisors File No. 180268

Dear Commissioners and Supervisors:

I am requesting that you include an amendment to this legislation that defines “proposed” as any project that *does not* involve a demolition of a single family home, particularly in the RH-1 zoned neighborhoods. ADUs should not be an economic incentive to demolish existing housing, because as is clear from the Housing Element, existing housing is generally considered to be more affordable than new construction.

Please consider the following broad points about ADUs:

What is the concept of an ADU? It is an “extra” dwelling unit on a lot. It is intended to provide private and separate, somewhat smaller living space, either for a relative or as a source of additional income as a rental property to the homeowner. That is the concern of the individual property owner.

What is the policy concern of government? It is to expand housing opportunities that are more affordable by design to more of the population.

It is concerning if ADUs could be an incentive to demolish a house just to build a very large house with an ADU. I think that is what occurred with the Discretionary Review for 653 28th Street (RH-1) which the Commission approved in September 2017. If there had been no DR, the Commission would not have heard this project. Contrary to what Ms. Mohan and Director Rahaim said at the June 7th hearing, that any demolition would require a CUA, that is not true for projects in the RH-1 which can be Administratively Approved. Vast swaths of the City are, for better or worse depending on your point of view, zoned RH-1. I do not think anyone wants to see an uptick in demolitions across these neighborhoods.

Sound, relatively affordable housing in the RH-1 neighborhoods can add ADUs without demolition. It is not good infill housing, to increase the ADUs, by demolishing single family homes and thereby doing what was referred to at the Planning Commission hearing on June 7th as “backdoor up-zoning” and lose relatively affordable housing.

Please consider this point: As the Planning Commission has discussed during deliberations for many projects, they have no control over how the interior of a property is used. Given the economics of building and the explosion of “monster home” construction it seems reasonable to suggest that the living space from an ADU in totally brand new single family construction is more likely to be kept off the market as a rental unit, and instead, *will be absorbed into the main, larger portion of the new housing*. This is probably *less likely* when an ADU is added to an existing building.

Until recently the City’s ADU legislation did not include the word “proposed”. The State legislation does. (SB 229 which went into effect in September 2017 and SB 831 which is pending). This State legislation was proposed by Senator Wieckowski. He represents the East Bay where there is more land and potentially brand new single family or town homes that could accommodate ADUs. That makes sense for “proposed” housing in the areas of California where there is still undeveloped land. San Francisco does not have undeveloped land....but there is space for ADUs in existing single family housing as Staff discussed in their presentation at the June 7th Commission hearing.

The idea of ADUs as infill is great for those single-family homeowners who want to add the unit. It is not great when it means the Demolition of housing by speculators or by a developer who wants to avoid the City’s intention to densify *by pretending to densify, but actually only wants to build a big house*. It is bad when existing, affordable housing is lost.

This seems like a potential loophole and potentially a negative for housing in San Francisco. Please create a definition of “proposed” that prohibits demolition of sound, viable, relatively affordable housing that matches San Francisco housing needs for now and in the future, and is compliant with the Housing Element of the General Plan. ADUs can be added to existing buildings, not demolished ones.

Sincerely,
Georgia Schuttish

cc: Kimia Haddadan; Marcelle Boudreaux; Jonas Ionin; Scott Sanchez; John Rahaim; Menaka Mohan;

