



Commission Streamlining Task Force
City Hall, Room 362
1 Dr. Carlton B. Goodlett Place
San Francisco, CA 94102

September 30, 2025

Re: Rent Board Commission recommendations

Dear Chair Harrington and members of the Commission Streamlining Task Force,

We write to oppose removing the appellate functions of the Rent Board Commission to the Board of Appeals.

The Rent Board Commission is made up of two tenants, two landlords, and one neutral member. This balanced structure has helped to legitimize the Board's decisions with both tenants and landlords, as well as the organizations that represent them. Moving the appellate functions of the Rent Board to the Board of Appeals, where tenant representation is not guaranteed and therefore likely absent, would undermine the Board's credibility with the tenants it is tasked with protecting, and likely with landlords as well.

The Rent Board Commission also brings deep expertise to a complex and multilayered area of law which includes the San Francisco Rent Ordinance itself, the implementing regulations the Commission has developed over time, and numerous intersecting state and local laws. The job the Rent Board Commission does requires specialized knowledge and experience hearing, discussing, and deciding appeals. They also adopt rules and regulations, a task that depends on their direct experience hearing appeals to ensure the rules are both effective and responsive to real-world disputes.

In some circumstances, it may make sense for appeals bodies to be independent from the City departments whose decisions they review, for example *when the department was itself a party* to the proceeding, in order to create more separation and neutrality. But that logic does not apply here. *The Rent Board is not a party to the disputes the Commission resolves as the Commission adjudicates between private parties.* And here, the department's appeals body is composed of two landlords, two tenants and a neutral who is neither, making the principle even less applicable.

Additionally, the Rent Board is a special fund department and as such is completely fee-supported; moving its appellate functions elsewhere cannot save any appreciative amount of money. Further, it is not streamlining to simply move functions from one department to another.

For all these reasons, but principally because the proposal would eliminate guaranteed representation of tenants on the body that handles appeals, we vehemently oppose this proposal.

Lastly, we want to note for the record that we share the concerns of the Race & Equity in All Planning Coalition regarding the Planning Commission recommendations and SOMCAN regarding the SOMA Stabilization Fund CAC and SOMA Community Planning Advisory Committee.

Respectfully submitted,

San Francisco Anti-Displacement Coalition
San Francisco Tenants Union
Affordable Housing Alliance
Chinatown Community Development Center
Eviction Defense Collaborative
Housing Rights Committee of San Francisco
North Beach Tenants Committee
Senior and Disability Action
SOMCAN