

***Regular Meeting of the
Abatement Appeals Board
July 16, 2025***

Appellant Statement

June 24, 2025

San Francisco Board of Appeals
49 South Van Ness Avenue, Suite 1475
San Francisco, CA 94103

Appeal No. 6950
338 Teddy Ave SF

Dear Board of Appeals Members,

My name is Connie Wong. I am the homeowner of 338 Teddy Avenue, San Francisco. I am writing to respectfully submit my appeal regarding the Order of Abatement issued for my property.

I purchased this house in April 2018 with the intent of living in it as a single-family residence. Over the years, I have made sincere efforts to comply with city codes, including initiating repairs, applying for permits, and working with architects and licensed professionals. When I became aware of existing issues inherited from the prior owner, I took steps to resolve them in good faith and at my own cost.

I am a U.S. citizen since 1988 and have lived and worked in San Francisco for many years. I have no history of intentional code violations and have always acted with the goal of maintaining a safe, law-abiding property. I also face ongoing health issues, including kidney disease and hypertension, which make prolonged construction or major structural alterations difficult and risky.

With this appeal, I am simply asking for fair consideration of the facts and documentation I have provided. I hope to resolve this matter reasonably and avoid unnecessary demolition or financial hardship.

Thank you very much for your time and attention to my appeal.

Sincerely,
Connie Wong
Homeowner, 338 Teddy Avenue
San Francisco, CA 94134

415 481 9402
cmlwong1@gmail.com

Table of Contents for Appeal Submission

Exhibit	Title	Description
A1	Grant Deed April 2018	Document showing legal ownership transfer of 338 Teddy Avenue
A2	3R Report	Official city record confirming the property is legally a single-family residence
A3	Statement on Awareness of Basement Occupants	Explanation of knowledge about basement occupants at time of purchase and intent to restore
A4	Buyout Agreement March 2021	Legal agreement where basement occupants agreed to vacate property
A5	Notice of Surrender June 1, 2021	Document confirming occupants formally surrendered basement space
B1	Tenant Agreement 2013 for Whole House	Evidence that the house was previously rented as one full unit
B2	Property Summary of Basement Occupants	Dates and details of basement occupancy beginning August 30, 2016
B3	Buyout Agreement 2018	First buyout agreement with same two occupants as 2021 agreement
B4_1	Kitchen Removal Declaration	Declaration describing the process and timing of kitchen removal following move-out
B4_2	Kitchen Removal Timeline	Statement and timeline showing kitchen was removed after basement vacated
B5	Paid Handyman Demolish Kitchen (June 12)	Canceled check to handyman for kitchen demolition
B6	Paid Handyman Junk Removal (June 18)	Canceled check for hauling debris and junk from kitchen and yard
B7	Kitchen Before Removal	

B8	Kitchen Removed in June 2021 and Rewiring	
B9	Basement After Kitchen Removal	
C1	Complaint 201767021 to Previous Owner	Original complaint and violation against previous owner (2017)
C2	Complaint 201763912 - Building in Poor Condition	Complaint from upstairs tenant in 2017 led to permits E4-E8 to repair structure
C3	NOV to Previous Owner	Copy of Notice of Violation issued before 2018 purchase
C4	Contract to Repair Building Front	Contract for structural repair work completed on building
C5	Paid Electrician Wiring Upgrade 1	First receipt or image showing payment for electrical upgrade
C6	Paid Electrician Wiring Upgrade 2	Second proof of electrician work
C7	Electrical Permit July 2021	Permit obtained for electrical inspection
C8	Electrical Contract to Rewire and Upgrade	Scope and contract for full house rewiring
C9	Electrical Permit EW202107066782	Official permit for upgraded electrical work
C10	Rewiring in Garage and Basement	Photographic evidence of electrical work performed in garage and basement
C11	NOV 2021 + OOA 2025 + Admin Charges	Combined document showing NOV, OOA, and penalties assessed
D1	SF Rent Board Notification & Tax Statements	Evidence showing only one legal housing unit per tax and Rent Board records
D2	Rent Stabilization & Tax Evidence	Confirmation of unit exemption and lack of multiple units assessed
E1	Complaint 202179766 July 2021	Alleged illegal unit complaint filed anonymously
E2	Screenshot of Complaint 202179766	Online record of the complaint
E3	Electrical Permit (Investigative) July 2021	Permit that triggered city inspection
E4	PA201806111530 - DBI Record	Application to repair staircase and handrail

E5	PA201805088575 - DBI Record	Dry Rot Repair
E6	PA201805290319 - DBI Record	Repair Window, front & back, garage door
E7	PA201806040955 - DBI Record	Repair Window
E8	PA202108116263 - Permit to Legalize Basement	Architect's permit application to legalize space as living area
E9	Floor Plan Drawing	Architect's drawing for proposed work
E10	Neighbor's Storage Shed Photo 1	Photo showing nearby structure similar to appellant's
E11	Neighbor's Storage Shed Photo 2	Nearby structure photo
E12	Neighbor's Storage Shed Photo 3	Nearby structure photo
F1	Doctor's Note on Health Status	Health note confirming chronic kidney disease and hypertension
F2	Statement on Non-Conversion of Basement	Statement detailing why space remains storage, not habitable
F3	Request to Replace Permit Application	Architect's communication requesting modification to PA
F4	Lower-Level Property Layout	Architect's layout showing the basement and attached storage area
F5	Cost of Compliance Estimate	Estimated cost breakdown for demolition and alternatives
G1	Naturalization Certificate	Proof of U.S. citizenship and long-term residency

Exhibit A01: Appeal Letter – Response to Order of Abatement

June 24, 2025

San Francisco Board of Appeals
49 South Van Ness Avenue, Suite 1475
San Francisco, CA 94103

RE: Appeal of Order of Abatement (6950) Issued December 11, 2024
Property Address: 338 Teddy Avenue, San Francisco, CA 94134
Appellant: Connie Wong, Owner
Block 6210, Lot 012

Dear Members of the Board of Appeals,

I am writing to formally appeal the Order of Abatement issued for my property located at 338 Teddy Avenue. I respectfully request that the Board review the facts and evidence I have submitted and reverse the enforcement action based on the following:

1. The Alleged Violation Was Not Observed While the Unit Was Occupied

The complaint filed in July 2021 (Complaint #202179766) alleges an illegal dwelling unit in the basement. However, the tenants vacated the premises by May 31, 2021, as part of a negotiated buyout agreement (Exhibits A4, A5, B2, B3). After their departure, the kitchen was dismantled in early June 2021. Demolition and junk removal work were performed on June 12 and June 18, 2021, as documented through checks and declarations (Exhibits B4_1, B4_2, B5, B6).

The inspector's visit was initiated not by the presence of an active unit but as a result of my application for an electrical permit to address a long-standing NOV inherited from the previous owner (Exhibits C3, E3). Therefore, the alleged violation was not witnessed during actual residential use, and no occupants were present. The kitchen was no longer functional, and the space was in transition to storage use at the time of inspection.

2. The Space Has Been Used Exclusively for Storage Since Mid-2021

Since the buyout and kitchen removal, the space has been used solely for storage. The declaration and photos confirm its current non-habitable status (Exhibits B4_2, F2, F4).

3. Good Faith Efforts to Comply with City Code and Resolve All Prior Issues

When I purchased the property in April 2018, there were two existing NOVs (Exhibits C1, C2 and C3). I took responsibility for them and successfully addressed the structural issues through permit applications and repair work (Exhibits C2, C4, E4–E8). I also upgraded the electrical system, including obtaining the necessary permits (Exhibits C5–C9, E3).

4. Legal and Historical Use as a Single-Family Home

The 3R Report (Exhibit A2), Rent Board and Tax Statements (Exhibits D1, D2) confirm that 338 Teddy Avenue is legally a single-family home. It has never been recognized as a two-unit building by the City. All taxes and registrations reflect this.

5. Update Regarding Prior Intent and Current Request

When I first submitted my brief in response to the Notice of Violation and Order of Abatement in December 2024, I was still hoping to remodel the downstairs space into a family room with a bathroom and laundry — a modest upgrade intended only for personal use. However, that plan would likely require upgrading the basement and bathroom to current building code, and the existing ceiling height is too low to meet modern habitability standards without extensive excavation and foundation work. This makes the project cost-prohibitive and physically disruptive.

Since then, my health has declined, and construction costs have continued to rise due to inflation. As a retired homeowner on a fixed income, I have reassessed my options. I now respectfully request permission to continue using the space as **storage only**, which is how it has been used without interruption since June 2021.

This change in my request is not inconsistent; it reflects the evolving reality of my personal situation. I have always acted in good faith, never intended to rent the space again, and have worked diligently to comply with City regulations, as shown in the documents provided.

6. Undue Hardship if Forced to Demolish Storage Area

The so-called “horizontal addition” is being used for storage, not habitation. Demolishing the structure would cause financial hardship and personal strain. I have provided cost estimates for demolition and relocation of storage (Exhibit F5). Furthermore, converting it to legal living space is not feasible due to the low ceiling, sloped lot, and the cost of rebuilding the foundation. My architect has estimated this to exceed \$150,000.

7. Medical Hardship and Health Limitations

I suffer from chronic kidney disease (stage 3A) and hypertension. Extensive construction, especially involving demolition or excavation, would put my health at risk (Exhibit F1). I respectfully ask the Board to take this into consideration.

8. Alternative Resolution and Request for Variance

I am not attempting to create a dwelling unit. I simply wish to continue using the space as storage, as it has been since 2021. Many homes in the neighborhood, including several nearby, have comparable storage structures (Exhibits E10–E12). I respectfully request the Board grant a variance, if necessary, to allow continued use of the space for non-habitable purposes.

9. Longstanding Good Faith and Law-Abiding Ownership

I have lived and worked in San Francisco for decades. I became a U.S. citizen in 1988 and have always strived to comply with local laws and maintain a safe property (Exhibit G1). My goal has never been to circumvent the law but to manage the property within my means and capabilities.

Thank you for considering this appeal. I am happy to answer any questions or provide additional documentation as needed.

Sincerely,
Connie Wong
Homeowner, 338 Teddy Avenue
San Francisco, CA 94134
415 481 9402
cmlwong1@gmail.com