

November 1, 2025

President John Trasviña
Vice President Jose Lopez
Commissioner Rick Swig
Commissioner Rebecca Saroyan
Board of Appeals
City Hall

RE: General Public Comment for 11/5/25

Dear Members of the Board of Appeals:

In light of some of the discussion by the Board during **Appeal No. 25-032** heard at the **October 29th** hearing, I am writing to encourage the Board, as a body or using their role as individual members who are well versed in land use matters in the City and County of San Francisco, to advocate for strong policies to preserve existing housing like the pair of Flats at **466-468 Elizabeth Street** in the upcoming meetings on the Family Zoning.

Here is the description of the work approved at **466-468 Elizabeth Street**:

Moving the front of the Flats forward on the lot, moving the rear of the Flats farther into the backyard, removing the roof and adding a floor, complete facade obliteration on both the front and the rear of the Flats, complete interior remodel and reconfiguration, excavation to add a garage.

If that scope of work isn't a Demolition what is?

The Board was right to want to see a rendering detailing the front and rear facades as was requested at the hearing.

And the Board was right to raise the issue of Alterations that exceed the scope of work and turn into Demolitions.

The Permit Holder was the owner at the time of the Enforcement. He was the owner prior to the Enforcement. That is clear from the record and the Assessor's Info.

The Entitlement was sold to him and purchased by him and the LLC, with the clear implication in the marketing that the project could be more like a single family home than a pair of Flats, which is the legal tenure of the property.

Attached is background information about the sale, the original house and the series of Demo Calcs used first by SIA and then by RK which is SIA rebranded.

I have also included Planning Commission **Resolution 20024** which is the Residential Flat Policy.

The Housing Element Short Term **Action Item 8.3.2** requires the codification of this Policy.

The Findings of **Resolution 20024** make clear that Flats are housing for Middle Income Families. In one of the documents at the end of the packet for the October 29th hearing, a neighbor writes about a family who lived in one of the Flats prior to the original sale. (*See email from Ms. Toton of 497 Elizabeth Street on page 108 of packet*).

As I wrote at the beginning of this letter, I think this Board, either as a Board or as individual members, has the experience in land use issues to comment on the preservation of housing and the impact from the loss of housing on tenants due to projects like **466-468 Elizabeth Street**.

The Tenant Protection Ordinance will be before the Planning Commission this coming Thursday and the Board of Supervisors sometime after that..

Flats provide housing not only for current residents, but for future residents as well. ***Looking around the City, it is hard not to notice how many pairs of Flats fill our different neighborhoods.***

Thank you.

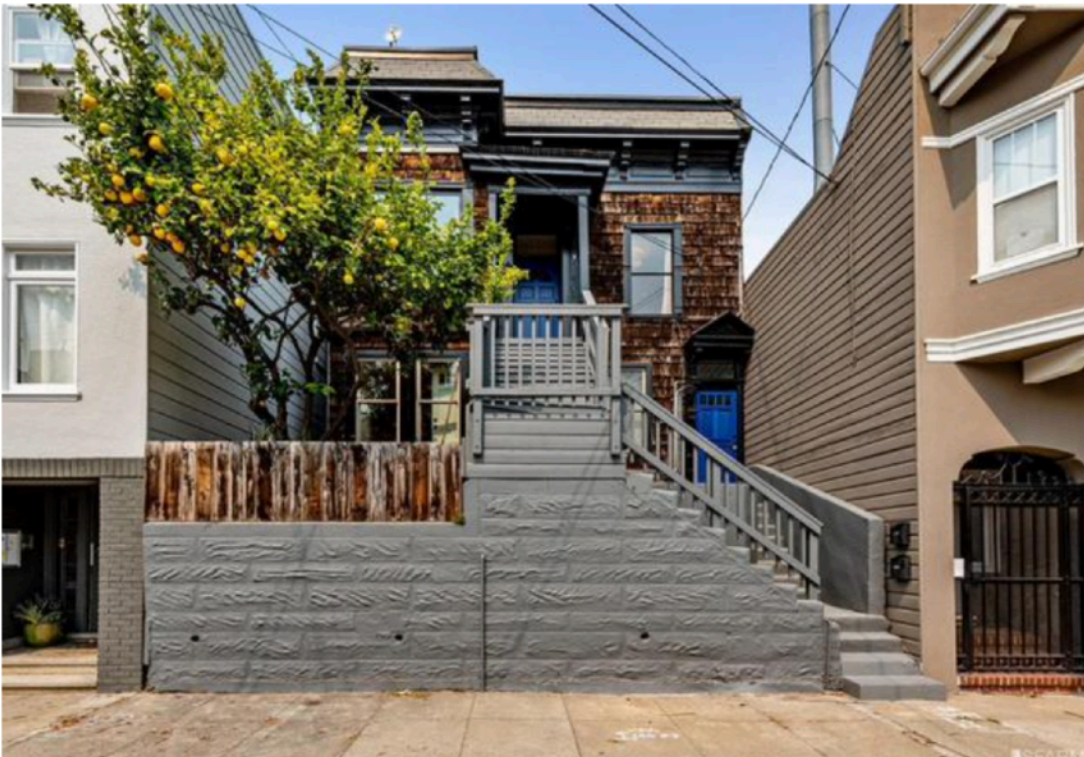
Sincerely,

Georgia Schuttish

Georgia Schuttish

cc: Julie Lamarre, Alec Longaway, Xiomara Mejia, Corey Teague

Attachments: **Pages 3 -4** Renderings/Photos; **Page 5** Original Floor Plan of Flat; **Pages 6-11** The progression of the Planning Code Section **317 Demo Calcs** from the Originally approved project through various versions at the time of the Planning Department Enforcement under the current Permit Holder going from Alteration to Demolition; **Page 12** Copy of Residential Flat Policy, Resolution 20024; **Page 13** Photos of original interior and link to Redfin Web Ad.



RENDERING AT TIME OF SALE OF ENTITLEMENT (Top)

**ORIGINAL HOUSE PRIOR TO FIRST SALE w/Two Front Doors
(Bottom)**



RENDERING OF REAR FROM WEB AD AT TIME OF SALE OF ENTITLEMENT
IN 2021 FOR **\$2.2 MILLION** (top)

ORIGINAL REAR OF PAIR OF FLATS (LOWER FLAT HAS EGRESS TO REAR
YARD BELOW PATIO/DECK)

ORIGINALLY SOLD IN 2018 FOR **\$1.9 MILLION** WHICH WAS **\$500K** OVER
ASKING PRICE (bottom)

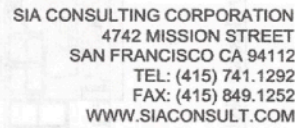
466-468 ELIZABETH STREET

SAN FRANCISCO

Existing Floor Plans



FLOOR PLAN FROM 2018 ORIGINAL WEB AD



FRONT FACADE	(E) Ln.Ft.	REMOVED	% REMOVED
FIRST FLOOR	25.17	14.42	
SECOND FLOOR	25.17	15.83	
REAR FACADE	(E) Ln.Ft.	REMOVED	% REMOVED
FIRST FLOOR	25.17	17.3	
SECOND FLOOR	21.75	17.3	
TOTAL	97.26	64.85	66.68%

Demolition Diagram Elevations (SFPC Section 317)

EXT. WALLS @ THE FOUNDATION LEVEL	(E) LENGHT FT.	REMOVED	% REMOVED
FIRST FLOOR (FRONT)	25.17	14.42	57.29%
FIRST FLOOR (REAR)	25.17	17.3	68.73%
FIRST FLOOR (LEFT)	61.08	6.25	10.23%
FIRST FLOOR (RIGHT)	61.08	35.25	57.71%
TOTAL:	172.5	73.22	42.45%

ELEVATION	(E) AREA Sq.Ft.	REMOVED	% REMOVED
FRONT	583	393	67.41%
LEFT	1179	109	9.25%
RIGHT	1145	356	31.09%
REAR	460	320	69.57%
TOTAL:	3367	1178	34.99%

HORIZONTAL SURFACE	(E) AREA Sq.Ft.	REMOVED	% REMOVED
SECOND FLOOR	1154	72	6.24%
ROOF	1300	1300	100.00%
TOTAL:	2454	1372	55.91%

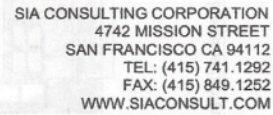
NO.	DATE	DESCRIPTION
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SHEET NO.

A 1 2

12/2018
REVISED 12/2019

#1 DEMO CALC MATRIX



DEMOLITION JUSTIFICATION PER SFPC 317(b)(2)(B) - PART 1

FRONT FACADE	(E) Ln.Ft.	REMOVED	% REMOVED
FIRST FLOOR	25.17	14.42	57.29%
SECOND FLOOR	25.17	24.8	98.53%
REAR FACADE	(E) Ln.Ft.	REMOVED	% REMOVED
FIRST FLOOR	25.17	17.3	68.73%
SECOND FLOOR	21.75	17.3	79.54%
TOTAL	97.26	73.82	75.90%

DEMOLITION JUSTIFICATION PER SFPC 317(b)(2)(B) - PART 2

EXT. WALLS @ THE FOUNDATION LEVEL	(E) LENGTH FL.	REMOVED	% REMOVED
FIRST FLOOR (FRONT)	25.17	14.42	57.29%
FIRST FLOOR (REAR)	25.17	17.3	68.73%
FIRST FLOOR (LEFT)	61.08	6.25	10.23%
FIRST FLOOR (RIGHT)	61.08	35.25	57.71%
TOTAL:	172.5	73.22	42.45%

DEMOLITION JUSTIFICATION PER SFPC 317(b)(2)(C) - PART 1 (VERTICAL ENVELOPE)

ELEVATION	(E) AREA Sq.Ft.	REMOVED	% REMOVED
FRONT	543	393	72.38%
LEFT	1194	123	10.30%
RIGHT	1178	378	32.09%
REAR	473	321	67.86%
TOTAL:	3388	1215	35.86%

DEMOLITION JUSTIFICATION PER SFPC 317(b)(2)(C) - PART 2 (HORIZONTAL ELEMENTS)

HORIZONTAL SURFACE	(E) AREA Sq.Ft.	REMOVED	% REMOVED
SECOND FLOOR	1187	58	4.89%
ROOF	1300	1300	100.00%
TOTAL:	2487	1358	54.60%

* APPROVED BY DBI
PLANS DATED
10/29/2020
% REMOVED SAME
AS THIS MATRIX

ISSUES / REVISIONS

NO. DATE D

SHEET NO.

A 13

2 DEMOCALC MATRIX



SIA CONSULTING CORPORATION
4653 MISSION STREET
SAN FRANCISCO CA 94112
TEL: (415) 741.1292
FAX: (415) 849.1252
WWW.SIACONSULT.COM

SHEET TITLE

**Demolition Diagram
Floor Plans
(SFPC Section 317)
Per Approved
Condition**

*DURING
ENFORCEMENT*

These documents are property of SIA CONSULTING and are not to be produced changed or copied without the expressed written consent of SIA CONSULTING ENGINEERS.

ISSUES / REVISIONS

NO.	DATE	DESCRIPTION

DRAWN S.M.

CHECKED R.K.

DATE 12/05/2018

REVISED DATE 03/16/2023

JOB NO. 18-1820

SHEET NO.

A-1.4

Demolition Calculation Per SFPC Section 317				
317(b)(2)(B):				Max.
Front & Rear Facades - Lineal Foundation Measurements				Permitted
Elevation	(E) LF	Removed	% Removed	
South (Front) Façade	25.17	15.33	60.9%	
North (Rear) Façade	21.75	18	82.8%	
Total	46.92	33.33	71.0%	50.0%
AND				AND
Exterior Walls - Lineal Foundation Measurements				
Elevation	(E) LF	Removed	% Removed	
East	62	33.25	53.6%	
West	62	9.75	15.7%	
South (Front) Façade	25.17	25.17	100.0%	
North (Rear)	21.75	18	82.8%	
Total	170.92	86.17	50.4%	65.0%
317(b)(2)(C):				
Vertical Envelope Elements - Surface Area Measurements				
Vertical Elements	(E) SF	Removed	% Removed	
East	1178	394	33.5%	
West	1187	140	11.8%	
North (Rear)	484	284	58.7%	
South (Front) Façade	597	385	64.5%	
Total	3446	1203	34.9%	50.0%
AND				AND
Horizontal Envelope Elements - Surface Area Measurements²				
Horizontal Elements	(E) SF	Removed	% Removed	
Basement (at grade) ¹	N/A	N/A		
1st Floor	1063	0	0.0%	
2nd Floor	1179	57	4.8%	
Roof	1300	1300	100.0%	
Total	3542	1357	38.2%	50.0%

12/2018

REVISED 3/2023

#3 DEMO CALC MATRIX



Demolition Diagram
Floor Plans
(SFPC Section 317)
Per As Built
Condition

DURING
ENFORCEMENT
*ONLY (B) VALUE
EXCEEDED

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ISSUES / REVISIONS

NO.	DATE	DESCRIPTION
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DRAWN S.M.

CHECKED R.K.

DATE 12/05/2018

REVISÉ DATE 03/16/2023

JOB NO. 18-1820

SHEET NO.

A-1.4

Demolition Calculation Per SFPC Section 317				
317(b)(2)(B):				Max.
Front & Rear Facades - Lineal Foundation Measurements				Permitted
Elevation	(E) LF	Removed	% Removed	
South (Front) Façade	25.17	25.17	100.0%	
North (Rear) Façade	21.75	21.75	100.0%	
Total	46.92	46.92	100.0%	50.0%
AND				AND
Exterior Walls - Lineal Foundation Measurements				
Elevation	(E) LF	Removed	% Removed	
East	62	62	100.0%	
West	62	62	100.0%	
South (Front) Façade	25.17	25.17	100.0%	
North (Rear)	21.75	21.75	100.0%	
Total	170.92	170.92	100.0%	65.0%
317(b)(2)(C):				
Vertical Envelope Elements - Surface Area Measurements				
Vertical Elements	(E) SF	Removed	% Removed	
East	1178	557	47.3%	
West	1187	546	46.0%	
North (Rear)	484	294	60.7%	
South (Front) Façade	597	597	100.0%	
Total	3446	1994	57.8%	50.0%
AND				AND
Horizontal Envelope Elements - Surface Area Measurements ²				
Horizontal Elements	(E) SF	Removed	% Removed	
Basement (at grade) ¹	N/A	N/A		
1st Floor	1063	0	0.0%	
2nd Floor	1179	57	4.8%	
Roof	1300	1300	100.0%	
Total	3542	1357	38.3%	50.0%

12/2018

REVISED 3/2023

#4 DEMO CALC MATRIX



RKD CONSULTING CORPORATION
4653 MISSION STREET
SAN FRANCISCO CA 94112
TEL: (415) 741.1292
WWW.RKDCONSULT.COM

SHEET TITLE

Demolition Diagram Floor Plans (SFPC Section 317)

Per Approved
Condition

DURING
ENFORCEMENT
+ CUA REVIEW
CALCS ON PAGE 2
OF EXEC. SUMMARY

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ISSUES / REVISIONS

NO.	DATE	DESCRIPTION
1	04/25/23	Planning Comments

DRAWN	S.M.
CHECKED	R.K.
DATE	12/05/2018
REVISED DATE	03/22/2024
INR NO	12-1220

Demolition Calculation Per SFPC Section 317				
317(b)(2)(B):				Max.
Front & Rear Facades - Lineal Foundation Measurements				Permitted
Elevation	(E) LF	Removed	% Removed	
South (Front) Façade	25.17	15.33	60.9%	
North (Rear) Façade	21.75	18	82.8%	
Total	46.92	33.33	71.0%	50.0%
AND				AND
Exterior Walls - Lineal Foundation Measurements				
Elevation	(E) LF	Removed	% Removed	
East	62	33.25	53.6%	
West	62	9.75	15.7%	
South (Front) Façade	25.17	25.17	100.0%	
North (Rear)	21.75	18	82.8%	
Total	170.92	86.17	50.4%	65.0%
317(b)(2)(C):				
Vertical Envelope Elements - Surface Area Measurements				
Vertical Elements	(E) SF	Removed	% Removed	
East	1178	394	33.5%	
West	1187	140	11.8%	
North (Rear)	484	284	58.7%	
South (Front) Façade	597	385	64.5%	
Total	3446	1203	34.9%	50.0%
AND				AND
Horizontal Envelope Elements - Surface Area Measurements ²				
Horizontal Elements	(E) SF	Removed	% Removed	
Basement (at grade) ¹	N/A	N/A		
1st Floor	N/A	N/A		
2nd Floor	1179	57	4.8%	
Roof	1300	1300	100.0%	
Total	2479	1357	54.7%	50.0%

12/2018

REVISED 3/2024

(SAME AS 5/2024)

F5 DEMO CALC MATRIX

SHEET TITLE

**Demolition Diagram
Floor Plans
(SFPC Section 317)
Per As Built
Condition**

DURING
ENFORCEMENT
+ CUA REVIEW
CALC ON PAGE 3
OF EXECUTIVE
SUMMARY

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ISSUES / REVISIONS

NO.	DATE	DESCRIPTION
1	04/25/23	Planning Comments

DRAWN	S.M.
CHECKED	R.K.
DATE	12/05/2018
REVISED DATE	03/22/2024
JOB NO.	18-1820
SHEET NO.	

A-1 5

Demolition Calculation Per SFPC Section 317				
317(b)(2)(B):				Max.
Front & Rear Facades - Lineal Foundation Measurements				Permitted
Elevation	(E) LF	Removed	% Removed	
South (Front) Façade	25.17	25.17	100.0%	
North (Rear) Façade	21.75	21.75	100.0%	
Total	46.92	46.92	100.0%	50.0%
AND				AND
Exterior Walls - Lineal Foundation Measurements				
Elevation	(E) LF	Removed	% Removed	
East	62	62	100.0%	
West	62	62	100.0%	0.0%
South (Front) Façade	25.17	25.17	100.0%	
North (Rear)	21.75	21.75	100.0%	
Total	170.92	170.92	100.0%	65.0%
317(b)(2)(C):				
Vertical Envelope Elements - Surface Area Measurements				
Vertical Elements	(E) SF	Removed	% Removed	
East	1179	593	50.3%	
West	1187	586	49.4%	
North (Rear)	484	387	80.0%	
South (Front) Façade	594	594	100.0%	
Total	3444	2160	62.7%	50.0%
AND				AND
Horizontal Envelope Elements - Surface Area Measurements ²				
Horizontal Elements	(E) SF	Removed	% Removed	
Basement (at grade) ¹	N/A	N/A		
1st Floor	N/A	N/A		
2nd Floor	1179	57	4.8%	
Roof	1300	1300	100.0%	
Total	2479	1357	54.7%	50.0%

12/2018
REVISED 3/2024
(SAME AS 5/2024)

#6 DEMO CALC MATRIX



**SAN FRANCISCO
PLANNING DEPARTMENT**

Planning Commission Resolution No. 20024

HEARING DATE: OCTOBER 12, 2017

1650 Mission St.
Suite 400
San Francisco,
CA 94103-2479

Reception:
415.558.6378

Fax:
415.558.6409

Planning
Information:
415.558.6377

Project Name: Planning Commission Policy: Removal of Residential Flats
Record Number: 2016-003658GEN
Staff Contact: Brittany Bendix, Current Planning
(415) 575-9114; brittany.bendix@sfgov.org
Reviewed By: Elizabeth Watty, Assistant Director of Current Planning
(415) 558-5620; elizabeth.watty@sfgov.org

ADOPTING A POLICY THAT REQUIRES MANDATORY DISCRETIONARY REVIEW OF ANY PROJECT IN ALL ZONING DISTRICTS THAT RESULTS IN THE REMOVAL OF A RESIDENTIAL FLAT.

WHEREAS, Objective 2 of the City's 2014 Housing Element states that "conserving and improving the existing (housing) stock is critical to San Francisco's long term housing strategy;" and

WHEREAS, the City is currently at 207% production and entitlement of market rate housing units, 16% production and entitlement of units affordable to moderate income households, and 31% production of below-market rate housing, as defined in the 2015-2022 RHNA goals;

WHEREAS, currently market-rate housing is frequently not accessible to moderate-income families, making between 80-120% of area median income;

WHEREAS, for the purpose of this Resolution a 'Residential Flat' is to be defined as a common San Francisco housing typology consisting of a single dwelling unit, generally occupying an entire story within a building, and having exposure onto open areas at the front and rear of the property;

WHEREAS, this unit typology satisfies a number of housing needs, particularly for middle-income families,

WHEREAS; a dwelling unit can currently be relocated, or altered, such that it no longer functions as a Residential Flat without public notification or review by the Planning Commission, so long as the proposal complies with all other requirements of the Planning Code;

WHEREAS, the Planning Commission is pursuing legislative amendments to Planning Code Section 317 that would require changes to the review process for projects that remove Residential Flats.

Resolution No. 20024
October 12, 2017

Case No: 2016-003658GEN
Removal of Residential Flats

NOW THEREFORE BE IT RESOLVED that the Commission hereby adopts a new policy that requires a Mandatory Discretionary Review application to be filed for any building or site permit that proposes the modification of a Residential Flat such that it is no longer a Residential Flat; and, be it

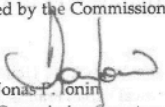
FURTHER RESOLVED, that projects increasing the number of dwelling units within a building will not be subject to this policy; and, be it

FURTHER RESOLVED, that this policy will allow time for the orderly completion of a planning study and for the adoption of appropriate legislation; and, be it

FURTHER RESOLVED, that this policy will sunset after the adoption of the Residential Expansion Threshold legislative initiative currently underway; and be it

FURTHER RESOLVED, that this policy shall apply to all building or site permit applications to remove a Residential Flat where the application has not been filed as of the effective date of this Resolution.

I hereby certify that the foregoing Resolution was adopted by the Commission at its meeting on October 12, 2017.


Jonas P. Jonin
Commission Secretary

AYES: Richards, Hillis, Fong, Koppel and Melgar

NOES: Johnson

ABSENT: Moore

ADOPTED: October 12, 2017



<https://www.redfin.com/CA/San-Francisco/466-468-Elizabeth-St-94114/home/194778166>

This is the interior of the one of the Flats at the time of the 2018 sale. I actually attended one of the open houses at the time and I can attest that both Flats were perfectly livable and sound.

There is also a You Tube video still uploaded on the web from that time if the Board Members are interested.