

April 29, 2025

To the San Francisco Board of Supervisors
c/o Clerk of the Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
bos.legislation@sfgov.org

Re: File No. 250340 – Response & Opposition from the Property Owner to “Addendum” to Appeal (submitted on 4/25/25) from Jennifer Nicole Miller of the Tentative Map for 2-4 Addison Street

Dear Supervisors,

This is in response to Jennifer Nicole Miller’s “addendum” to her appeal of the Tentative Parcel Map for our property at 2-4 Addison Street in San Francisco, which she submitted on April 25, 2025. As noted in our response and opposition from April 25, 2025, Ms. Miller is the owner of 8 Addison Street, the property immediately to the west of 4 Addison Street (now 2-4 Addison Street).

We are the property owners of 2-4 Addison Street (APN 7542-033). We write to respond to and refute Ms. Miller’s additional baseless claims that she has raised in her “addendum” to the appeal. She has not provided any facts or evidence to over-rule the approval of the Tentative Map by the Director of the Department of Public Works (“DPW”) (acting through the Interim City & County Surveyor, Katharine S. Anderson (the “Surveyor”)).

Ms. Miller continues to raise issues that have nothing to do with the approval of the Tentative Map. The Board of Supervisors should affirm the DPW’s sound decision approving the Tentative Map and deny her appeal for our property at 2-4 Addison Street.

We address her “Addendum” to her appeal below to ensure that there is an accurate record.

Response & Opposition to her “Addendum” to Ms. Miller’s Appeal.

As to the illegal encroachment from 8 Addison (fence and hardscaping), Ms. Miller’s own surveyor has confirmed the encroachment; there is no dispute that the fence and hardscaping are encroaching on 2-4 Addison Street. Ms. Miller has not explained why the fence and hardscaping cannot be moved to the property line, as we have asked to be done. We are working with Ms. Miller, through our attorneys, to try to resolve the matter. If she is claiming some sort of “equitable easement”, we will address that issue with her to ensure that it is equitable for us as the new property owners of 2-4 Addison Street. In addition, Peter J. Bekey of KCA Engineers, Inc., the surveyor for 2-4 Addison, has placed rear markers for 2-4 Addison on the property, or will do so shortly. The rear marker on the west side of 2-4 Addison may not be able to be placed because Ms. Miller’s

encroaching fence is in the way. *See Exhibit B* to our response of 4/25/25 (Tentative Map). We assume that an offset stake will be placed indicating the distance to the property corner.

As we have previously stated in our response and opposition of April 25th, we will comply with all Planning requirements for this SB423 project. Ms. Miller's raising of a "cantilevered development" and driveway are irrelevant to the Tentative Map approval. However, as noted we are working closely with the Planning Department to ensure the buildings comply with all applicable local requirements for our SB423 project. A "cantilevered development" is not prohibited provided that it does not cross the property line.

We have previously addressed her raising of the sewer easement in our response and opposition of April 25th. The sewer easement is entirely on 8 Addison, Ms. Miller's property. The sewer easement has nothing to do with 2-4 Addison. It is not for consideration for the Tentative Map for 2-4 Addison Street.

As to the bus stop, the bus stop for the #35 (Glen Park BART to Market/Castro) is entirely in front of 36 Bemis, not 2-4 Addison Street. There is already a bus stop and demarcations on the curb for the bus stop in front of 36 Bemis. *See Exhibit H* (photos of the bus stop for the #35 entirely in front of 36 Bemis). In any event, the bus stop has no relevance to the Tentative Map determination. As to Ms. Miller's request for a stop sign at Bemis & Addison, this also has no relevance to the Tentative Map determination and approval. We will submit detailed sidewalk plans as part of the normal building permit submission and adhere to all of DPW's requirements.

Conclusion – DWP's Approval of The Tentative Map Should Stand.

Ms. Miller has not raised any "supplemental" issues that warrant over-ruling the sound decision of the Director of Public Works, acting through the Surveyor. Ms. Miller has failed to establish that the Surveyor did not follow the objective standards of this SB423 project in approving the Tentative Map.

The Board of Supervisors should deny Ms. Miller's appeal. The Surveyor's decision should stand and the Tentative Map for 2-4 Addison Street should proceed to a Final Parcel Map.

Respectfully submitted,

Erean O'Neill & Simone Katz-O'Neill

SENC, LLC

Owner of 2-4 Addison Street

Exhibit G



2- 4 Addison St.



2-4 Addison St.

