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February 7, 2017

VIA E-MAIL

London Breed, President, and Honorable Supervisors
City and County of San Francisco
Legislative Chamber, Room 250
City Hall, 1 Dr. Carlton B. Goodlett Place
San Francisco, CA 94102-4689
E-Mail: London.Breed@sfgov.org

**Re: February 7, 2017 Board of Supervisors Agenda Item #13
161291 — Administrative Code - Update Hotel Conversion Ordinance
And Public Act Records Request**

Dear President Breed and Honorable Supervisors:

This law firm represents the San Francisco SRO Hotel Coalition, whose members own and operate numerous residential hotels in San Francisco that would be affected by the amendments proposed by the above-referenced agenda item ("Proposed Amendments") to the City's Hotel Conversion Ordinance ("HCO"). While we understand and appreciate the City's desire to maintain the existing stock of residential hotels, the Proposed Amendments would directly affect the property rights of some 500 hoteliers and they are virtually certain to have myriad unintended and adverse consequences for the environment – including the very vulnerable human population the Proposed Amendments are purportedly intended to benefit. This letter is written in part to highlight those negative consequences, to object to adoption of the Proposed Amendments as currently drafted, and to urge further consideration and study prior to adopting these or any HCO revisions. This letter also identifies a range of procedural issues and problems with the proposed enactment and explains why approving the Proposed Amendments to the HCO in the manner now proposed and on the current record would violate the California Environmental Quality Act ("CEQA"; Pub. Resources Code, § 21000 *et seq.*) and the CEQA Guidelines (14 Cal. Code Regs., § 15000 *et seq.*).

We also request that the City produce relevant documents pursuant to the California Public Records Act, (Gov. Code, § 6250 *et seq.*), as set forth in Attachment A to this letter.

The proposed HCO Amendments would lead to a range of unintended, and detrimental, consequences to tenants.

Attached hereto as Exhibit A is a copy of an email setting forth the content of a January 26, 2017 letter delivered on that date to Supervisor Aaron Peskin by Juned Usman Shaikh, owner of the Tropicana Hotel, and one of the many hoteliers whose properties and businesses would be affected by the Proposed Amendments. As underscored by the Shaikh letter, the most serious unintended consequence of the Proposed Amendments' elimination of rentals for less than a 32-day period (i.e., hotel elimination of weekly rentals, which have been allowed for almost 40 years, since the HCO's inception) will be a dramatic reduction in the number of SRO housing units available to possible users – and consequent displacements of large numbers of SRO tenants directly into the City's streets and/or homeless shelters. Hundreds of residential hotels will be affected by the Proposed Amendments, exposing multiple hundreds of short-term rental SRO tenants to displacement and possible homelessness. As the California Supreme Court has aptly observed in upholding a prior version of the City's HCO against various takings challenges: "While a single room without a private bath and kitchens may not be an ideal form of housing, such units accommodate many whose only other options might be sleeping in public spaces or in a City shelter. Plaintiffs do not dispute that San Francisco has long suffered from a shortage of affordable housing or that residential hotel units serve many who cannot afford security and rent deposits for an apartment." (*San Remo Hotel v. City and County of San Francisco* (2002) 27 Cal.4th 643, 674, *emph. added.*)

As demonstrated by the Shaikh letter previously submitted to the Board, and as confirmed by our client, many SRO units will not be able to be rented under the Proposed Amendments requiring minimum rentals of not less than 32 days because most SRO users cannot come up with a full month's rent or deposit, and most operators cannot have units occupied on a weekly installment payment basis because of difficulties in evicting non-paying longer-term occupants. The result of this will be that many short-term users and renters will no longer have the benefit of these SRO units. The monthly rental value of SRO units in most cases will be beyond the means of low income, disabled, elderly, and "transient" users, resulting in the units remaining vacant under the proposed HCO Amendments. As noted, this will also foreseeably cause a displacement of such tenants into the City's streets or shelters, with resulting direct and reasonably foreseeable indirect adverse environmental impacts that have not been studied, or even acknowledged, by the City.

Other adverse consequences will ensue. Due to their unusual character, severe economic impacts, and interference with longstanding investment-backed expectations, the Proposed Amendments will effect an unlawful taking of private property rights of affected hoteliers. (*See, e.g., Lingle v. Chevron U.S.A. Inc.* (2005) 544 U.S. 528 and *Penn Central Transportation Co. v. New York City* (1978) 438 U.S. 104.) Additionally, there will be a concomitant serious reduction of staff/labor

because of operators' inability to rent out SRO units on a weekly basis, resulting in lower SRO hotel revenues. The ultimate economic consequence for SRO hotel employees will be a greater volume of lay-offs for lower wage earners, including those with families.

Further, the Amendments do not define "prospective Permanent Resident" or even give any helpful guidance or assistance on this issue. An unintended consequence of this will be encouraging deception and lack of transparency on this issue.

The Proposed Amendments appear to have been planned and passed as a matter of political expediency for certain constituents without a larger vision as to real housing solutions and practical environmental, human and economic impacts. In addition to the very real adverse but unstudied environmental and human impacts, this will only delay and divert the City from productively engaging in the hard work and committing the resources necessary to create more adequate "residential" units for the truly very low income.

The City's meeting agendas are inadequate under the Brown Act and the City's own Sunshine Ordinance, and they fail to follow the City Attorney's Good Government Guide.

The Ralph M. Brown Act (Cal. Gov. Code, § 54950 *et seq.*¹) is designed to encourage public participation in government decision making. (*Bell v. Vista Unified School Dist.* (2000) 82 Cal.App.4th 672, 681.) "[T]he keystone of the Brown Act is the requirement that '[a]ll meetings of the legislative body of a local agency shall be open and public' " (*Roberts v. City of Palmdale* (1993) 5 Cal.4th 363, 375.)

The Brown Act begins with a forceful declaration of the Legislature's purpose:

In enacting this chapter, the Legislature finds and declares that the public commissions, boards and councils and the other public agencies in this State exist to aid in the conduct of the people's business. It is the intent of the law that their actions be taken openly and that their deliberations be conducted openly.

The people of this State do not yield their sovereignty to the agencies which serve them. The people, in delegating authority, do not give their public servants the right to decide what is good for the people to know and what is not good for them to know. The people insist on remaining informed so that they may retain control over the instruments they have created.

§ 54950.

¹ All statutory references in this section are to the California Government Code.

In relevant part, the Brown Act requires that “[a]t least 72 hours before a regular meeting, the legislative body of the local agency, or its designee, shall post an agenda containing a brief general description of each item of business to be transacted or discussed at the meeting . . . A brief general description of an item generally need not exceed 20 words.” § 54954.2. In addition, “[n]o action or discussion shall be undertaken on any item not appearing on the posted agenda” § 54954.2(a)(3).

The courts have explained that agenda drafters must give the public a fair chance to participate in matters of particular or general concern by providing the public with more than mere clues from which they must then guess or surmise the essential nature of the business to be considered by a local agency. Thus, in *Moreno v. City of King* (2005) 127 Cal.App.4th 17, although a city was considering taking disciplinary action against its finance director, including possible termination, its agenda item was inadequate because it merely stated that in closed session the city would consider: “ ‘Per Government Code Section 54957: Public Employee (employment contract).’ ” (*Id.* at p. 21)

In holding this failed to give notice to either the public, or the finance director, that the council was considering disciplining or terminating him, the court stated: “It was undisputed that at least a quarter of the meeting was actually devoted to a discussion of [the finance director] and whether to terminate him The agenda’s description provided no clue that the dismissal of a public employee would be discussed at the meeting.” (*Id.* at pp. 26–27)

Importantly, the court went on to point out how easily the city council could have met the requirements of the Brown Act: “[A]n agenda that said simply ‘Public Employee Dismissal’ would have provided adequate public notice of a closed session at which the Council would consider [the finance director’s] dismissal.” (*Moreno, supra*, at p. 27)

The Sunshine Ordinance (San Francisco Administrative Code Chapter 67) provides a notable twist on the Brown Act’s minimum noticing requirement. Instead of requiring a “brief general description” the Sunshine Ordinance requires that the City “post an agenda containing a meaningful description of each item of business to be transacted or discussed at the meeting.” (Sunshine Ordinance at § 67.7(a)) The Sunshine Ordinance explains that “[a] description is meaningful if it is sufficiently clear and specific to alert a person of average intelligence and education whose interests are affected by the item that he or she may have reason to attend the meeting or seek more information on the item. The description should be brief, concise and written in plain, easily understood English.” (*Id.* at § 67.7(b))

In *The Good Government Guide*, the City Attorney explains that “[i]n particular instances, it may be unclear whether the description of an agenda item satisfies the ‘meaningful description’ standard. And on occasion there can be tension between a

description that is meaningful and one that is brief and concise. In such cases, it often is better to err on the side of a longer, more informative description.”

Here, the January 31, 2017, and February 7, 2017 meeting agendas for the Proposed Amendments merely provide as follows:

[Administrative Code - Update Hotel Conversion Ordinance]

Sponsors: Peskin; Kim, Safai, Sheehy, Cohen, Ronen and Yee

Ordinance amending Administrative Code, Chapter 41, to update the Hotel Conversion Ordinance, including: adding or refining definitions of tourist and transit use, comparable unit, conversion, and low-income household; revising procedures for permits to convert residential units; harmonizing fees and penalty provisions with the Building Code; eliminating seasonal short-term rentals for residential hotels that have violated provisions of the Hotel Conversion Ordinance in the previous year; authorizing the Department of Building Inspection to issue administrative subpoenas; adding an operative date; and affirming the Planning Department's determination under the California Environmental Quality Act.

Instead of fairly describing the “essential nature” of the Proposed Amendments, the agendas provide a sanitized description that fails to disclose that the Proposed Amendments are intended to dramatically reshape the City's SRO market by imposing strict limits on the ways hoteliers may operate and use their properties. The key feature of the Proposed Amendments is to prohibit SRO rentals for less than 32 days, yet the agendas fail to say anything about that attempt at central planning. Instead, with respect to this issue, the agendas simply state “adding or refining definitions of tourist and transient use.” Moreover, the agendas fail to say that the Proposed Amendments would impose new application requirements, sharply increase penalties on hoteliers, and increase reporting requirements.

In short, the notices provided by the City in connection with adoption of the Proposed Amendments fail to comply with the minimum requirements of the Brown Act and the City's Sunshine Ordinance. The City must not only comply with state law, but with its own code requirements, including those of the Sunshine Ordinance. (*Woody's Group, Inc. v. City of Newport Beach* (2015) 233 Cal.App.4th 1012 (“the city's incantation of a ‘policy and practice’ in direct violation of its own code cannot conform that alleged policy and practice to due process.”).)

The HCO and Proposed Amendments constitute a zoning ordinance, subject to the procedural requirements for adopting and amending such ordinances.

The HCO is organized structurally as part of the City's Administrative Code, which regulates on a wide range of issues such as nondiscrimination in contracts, sick leave, jails and prisoners, payroll procedure, and public health. As a practical matter, however, the HCO regulates land use and zoning, and as such the HCO and the Proposed Amendments are subject to the requirements of the state's Planning and Zoning Laws and in particular Government Code section 65850(a), which states that the legislative body may adopt ordinances that “[r]egulate the use of buildings,

structures, and land as between industry, business, residences, open space, including agriculture, recreation, enjoyment of scenic beauty, use of natural resources, and other purposes.”

The Court of Appeal interpreted and applied section 65850 recently in *People v. Optimal Global Healing, Inc.* (2015) 241 Cal.App.4th Supp. 1. There, a medical marijuana business argued that a ballot initiative to regulate such businesses affected land use and, as such, contained a zoning component subject to section 65850. (*Id.* at p. 7-9) Among other things, the initiative makes it a misdemeanor to makes it a misdemeanor to “own, establish, operate, use, or permit the establishment or operation of” a medical marijuana business. (*Id.*) Rejecting the City of Los Angeles’ argument that the initiative was “a nuisance ordinance related to public health, safety and morals, not a zoning ordinance,” the Court held that the initiative “must also have the effect of “[r]egulat[ing] the use of buildings, structures, and land.” (*Id.*)

The Legislative Digest that accompanies the Proposed Amendments makes clear precisely how the HCO and the Proposed Amendments are a zoning ordinance. In particular, the Legislative Digest explains that

The Hotel Conversion Ordinance (“HCO”), Administrative Code Chapter 41, regulates some 18,000 residential units within 500 residential hotels across the City. The HCO prohibits residential hotel operators from demolishing or converting registered residential units to tourist or transient use. The HCO defines conversion as eliminating a residential unit, renting a residential unit for a less than 7-day tenancy, or offering a residential unit for tourist or nonresidential use. The HCO allows seasonal tourist rentals of residential units during the summer if the unit is vacant because a permanent resident voluntarily vacated the unit or was evicted for cause by the hotel operator.

The HCO requires hotel owners or operators who wish to convert or demolish a residential unit to seek a permit to convert from the Department of Building Inspection (“DBI”). The permit to convert application process does not require submission of all the essential information that DBI needs to make a preliminary determination on an application, such as the location of the proposed replacement units and the last known rent of the units to be converted.

As a zoning ordinance, the HCO and the Proposed Amendments “shall be adopted in the manner set forth in Sections 65854 to 65857, inclusive.” (Gov. Code, § 65853.) There are numerous procedures and notice requirements that must be followed for the adoption and amendment of zoning ordinances under those sections. For example, the planning commission must hold a public hearing on the

Proposed Amendments with notice to be given pursuant to Government Code § 65090 “and, if the proposed ordinance or amendment to a zoning ordinance affects the permitted uses of real property, notice shall also be given pursuant to Section 65091.” The latter section requires notice to be given in numerous ways: “(1) ... mailed or delivered at least 10 days prior to the hearing to the owner of the subject real property Notice shall also be mailed to the owner’s duly authorized agent, if any, and to the project applicant (4) Notice of the hearing shall be mailed or delivered at least 10 days prior to the hearing to all owners of real property . . . within 300 feet of the real property that is the subject of the hearing” (Gov. Code, § 65091(a)(1), (4).) The notice must include the information specified in § 65094 (Gov. Code, § 65091(b)), which includes “a general explanation of the matter to be considered, and a general description, in text or by diagram, of the location of the real property, if any, that is the subject of the hearing.” Other procedural and notice requirements apply to city council hearings on zoning ordinances, for which notice pursuant to Section 65090 must be given. (Gov. Code, § 65856.) None of these procedures have been followed to provide the legally required notice of the Proposed Amendments to the affected hoteliers/property owners here.

The proposed amendments would have significant adverse and unstudied environmental effects, including those resulting from displacement of vulnerable low-income tenants.

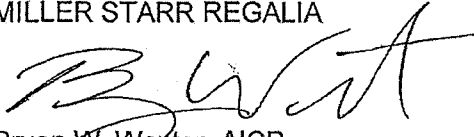
Contrary to the City’s determination, adoption of the Proposed Amendments is a discretionary CEQA “project” undertaken by the City and is not categorically exempt. A “project” for purposes of CEQA is any activity that may cause a direct or reasonably foreseeable indirect change in the environment. (Pub. Resources Code, § 21065; CEQA Guidelines, § 15378.) Zoning ordinances like the Proposed Amendments that affect land use are clearly CEQA projects. Substantial evidence supports at the very least a fair argument that the Proposed Amendments may cause significant adverse direct environmental impacts subject to mandatory CEQA review, study and analysis, including hundreds and hundreds of displaced tenants and the resulting increase in homelessness and people living on the City’s streets and in its public spaces. (See, e.g. *Muzzy Ranch v. Solano County Airport Land Use Commission* (2007) 41 Cal.4th 372 [holding that development displaced by density limits is not too speculative of an impact to require CEQA analysis].)

It is reasonably foreseeable that adverse changes to the physical environment from such massive tenant displacement will also include public trash, human feces, urination, pollution of waterways, waters, and City public and private spaces, and adverse impacts to the displaced human beings themselves from lack of water and livable accommodations, exposure, cold, suffering, and disease. The City’s Department of Public Health (SFDPH) has for years routinely included residential displacement analyses in its Environmental Impact Assessments (“EIAs”) for other projects (e.g., demolition and rezoning) to assess adverse effects on human

populations and housing, and the Board should require no less under CEQA here. Substantial record evidence and common sense show the HCO Amendments will or may lead to decreases in residential housing options for hundreds of low income residents, and resulting increased voluntary and involuntary displacements of residents incapable of renting on more than a week-to-week basis. CEQA requires the City to conduct an analysis of these reasonably foreseeable and significant environmental impacts, and develop and consider alternatives and mitigation measures that would avoid or ameliorate them, before further proceeding with its project to adopt the Proposed Amendments.

Sincerely,

MILLER STARR REGALIA



Bryan W. Wenter, AICP

BWWV/klw

Attachments

cc: Angela Calvillo, Clerk of the Board (angela.calvillo@sfgov.org)
San Francisco SRO Hotel Coalition
Arthur F. Coon, Esq.

ATTACHMENT A

Pursuant to the Public Records Act and all applicable law, we hereby formally request that the City make available for inspection and copying the following public records that are within its possession, custody, or control: all "writings" (as defined in California Evidence Code, § 250) that comprise, constitute, or relate to all of the following:

- The person, persons, organizations, or entities that suggested the Proposed Amendments or that in any way initiated the Proposed Amendments or caused the Proposed Amendments to be initiated.
- The rationale or justification for the Proposed Amendments.
- CEQA review or studies for any aspect of the Proposed Amendments or potential environmental effect of the Proposed Amendments, including but not limited to displacement of tenants.
- The City's record retention policies.

With regard to all of the requested documents, the public records we seek include all writings, regardless of physical form or characteristics, prepared, kept, owned, received, used, or provided to or by City, whether such records are on a publicly owned or privately owned computer, tablet, phone, or electronic device, and whether on a publicly owned and maintained or privately owned and maintained account or server.

"Records" should be broadly construed to include any handwriting, typewriting, electronic mail, text message, voicemail, printing, photostating, photography, and every other means of recording upon any form of communication or representation, including letters, words, pictures, sounds or symbols or any combination thereof, and all papers, maps, magnetic or paper tapes, photographic films and prints, magnetic or punched cards, discs, drums, and other documents.

"City" should be broadly construed to include any council, board, commission, department, committee, official, officer, council member, commissioner, employee, agent, or representative of the City.

This request reasonably describes identifiable public records or information to be produced from those public records. If the City contends it is unable to comply with this request because the City believes the request is not sufficiently focused, then pursuant to California Government Code section 6253.1(a), we request that the City (1) assist us in identifying the records and information that are responsive to our request and/or to the purpose of our request, (2) describe the information technology and physical location in which the records exist, and (3) provide us with suggestions for overcoming any practical basis for denying access to the records or information we are seeking.

Under Government Code section 6253(b), we ask that the City make the records promptly available for inspection and copying. This is a matter of some urgency to my clients given the pendency of their appeal to the Planning Commission.

We do not believe any provision of law exempts the records from disclosure. However, if the City determines that a portion of the records we have requested is exempt from disclosure, Government Code section 6253(a) requires segregation and deletion of those materials so that the remainder of the records may be promptly released. Article I, § 3(b)(2) of the California Constitution requires a broad construction of any statute, court rule, or other authority intended to further the people's right of access and a narrow construction of any statute, court rule, or other authority if it limits the right of access. If the City determines that an express provision of law exempts from disclosure all or a portion of the records requested, Government Code section 6253(c) requires the City to promptly notify us of that determination and the reasons for it with 10 days from receipt of this request. In addition, Government Code section 6253(d) prohibits the use of the 10-day period or any other provision of the PRA to delay or obstruct the inspection or copying of public records.

For any responsive public record kept in electronic format, we request that an electronic copy of the document be produced in that format, pursuant to Government Code section 6253.9.

Please notify us by phone or email when any portion of the documents is ready, and we will arrange for its pick up by courier. Also, please notify us regarding the reasonable copying costs, and we will promptly send payment.

If documents are voluminous, then please indicate in your response the approximate volume of documents responsive to this request, and the location, dates, and times upon which inspection will be allowed. If you can provide documents in response to one or more of the above requests sooner than for others, please so indicate, and we will arrange for their pick up as such documents become available.

If you have any questions or concerns, or need additional information to comply with this request, please contact the undersigned at your earliest convenience. Thank you in advance for your prompt attention to this request.

From: "Juned Usman Shaikh" <js@hoteltropica.com>
Date: January 26, 2017 at 11:22:27 AM PST
To: <Aaron.Peskin@sfgov.org>, <Sunny.Angulo@sfgov.org>, <Lee.Hepner@sfgov.org>
Cc: <sdarbar@aol.com>, <dipakstayinsf@gmail.com>, <sp@bms-hotels.com>, <amotawala@live.com>, <anilpatel855@yahoo.com>, <vikcpatel@gmail.com>, <nap310@sbcglobal.net>, <rstratton@hansonbridgett.com>, <nayno33@sbcglobal.net>, <dpatel46@sbcglobal.net>, <pagnoletti@ehmergroup.com>, <clubrio232@aol.com>, <laynehotel@aol.com>, "Kiran Patel" <km_patel@yahoo.com>, <kenpatel04@gmail.com>, <kbthakor@gmail.com>, <dannypatel73@yahoo.com>, <winsor206@sbcglobal.net>, <akshayamin@sbcglobal.net>, <rpatel1541@gmail.com>, <nasir24@aol.com>
Subject: RE: Hotel Conversion Ordinance Legislation (HCO) - Preservation of Weekly Rentals for SRO Hotels. - January 26th, 2016
To: Honorable Supervisor Aaron Peskin
Reply-To: <js@hoteltropica.com>

January 26th, 2016

The Honorable Aaron Peskin
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102-4689

Re: Hotel Conversion Ordinance Legislation - Preservation of Weekly Rentals for SRO Hotels.

Dear Honorable Supervisor Peskin,

I hope this letter finds you in the best of spirits. I would like to Thank you wholeheartedly for sitting down with me and my cousin Mr. Nasir Patel a few weeks ago regarding the SRO Ordinance Issue.

I understand and appreciate the time and effort Ms. Sunny Angulo and your staff have devoted to this sensitive matter. Supervisor Peskin When I saw you personally at the meeting I felt relieved and honored that you took time out of your schedule to hear us out.

I am extremely concerned about the changes proposed in the HCO ordinance and how it will affect our Hotel Business and our Local Community.

¹
EXHIBIT A

I look into the immediate future and first and foremost sadly see our Prenatal Homeless Program being stopped immediately if we cannot accommodate Weekly Rentals, looking beyond that I see myself not being able to provide housing to so many different people from our Great City.

By eliminating Weekly Rentals you are removing a very affordable and approachable housing option; Fully Furnished, All Utilities included Hotel Rooms with Week to Week Flexibility for San Franciscan's. We are the only housing option left in San Francisco that someone with even questionable credit or even NO Credit or Verifiable References can walk in off the street and take advantage of and receive immediate housing. At our Hotel Tropica and countless others in San Francisco we don't even ask for proof of income or even a deposit at time of check in. By eliminating Weekly Rentals Local San Franciscan's will be unfairly punished by having to come up with thousands of dollars in rent and deposit not to mention red tape just to rent a simple hotel room.

Not all San Franciscan's have the ability to come up with a large amount of an entire monthly rent payment all together at the beginning of each and every month; which is what makes the Weekly Rental option even more critical for persons who are working in industries and sectors where the pay and schedules fluctuate depending on various economic factors; I.e. Taxi Drivers, Restaurant Industry Workers, Blue Collar Jobs, Construction Workers, Couriers and Delivery Guys.

Some of the types of Local People & Social Service Providers we provide housing for are:

- Expecting Mothers & Newborn Babies from Homeless Prenatal Program.
- Local San Franciscan's - In between jobs or careers.
- San Francisco Residents - Who need a temporary place to stay while they are switching apartments or having renovations done.
- UCSF and General Hospital Patients In and out of the hospital.
- Red Cross Sponsored Fire Victims.
- Veterans From Swords to Plowshares
- And Countless Other members of our Local Community from all walks of life who appreciate the Accessibility, Convenience, Flexibility and Value that can be found only in SRO Hotels with Weekly Rentals.

All of the Persons and Social Service Programs mentioned above; had one thing in common they all started off their Tenancies as Weekly Rentals that sometimes continue for 5, 10 and even 20 Years all the while having the Flexibility of making rental payments in Weekly Installments.

Weekly Rentals give San Francisco Locals and City Based Social Services a choice and *quick* go-to option in finding housing in Our Great City. Please Let the Local San Francisco Public Choose for themselves. Don't take an affordable, Flexible, Easily available Housing Option away from the people of San Francisco.

In conclusion I humbly request you Honorable Supervisor Peskin to please remove the 32 Day Minimum Stay requirement in your proposed HCO legislation; and let us continue to operate our SRO with Weekly Rental's just like we have been for many decades.

If we eliminate Weekly Rentals from SRO Hotels; Tenants and Landlords will suffer equally. Having spent my entire life in the SRO Hotel Business in San Francisco; I truly believe available SRO Housing Stock Will decrease rather than increase and the people of San

Francisco will have more difficulty in finding stable, affordable housing if this Legislation passes. Please allow us to continue Weekly Rentals and continue to serve the Fine Citizens of San Francisco.

Thank you for taking the time to read my letter.

P.S. I live on-site with my family here at "Hotel Tropica" I invite you or your staff over to visit us at any time day or night. You are always most welcome.

Sincerely,

Juned Usman Shaikh, GM

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San Francisco, CA 94110

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