File No. 251211 **Committee Item No.** 4
Board Item No. _____

COMMITTEE/BOARD OF SUPERVISORS

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Prepared by: John Carroll **Date:** July 23, 2026
Prepared by: _____ **Date:** _____
Prepared by: _____ **Date:** _____

[Public Works, Administrative, Planning, Business and Tax Regulations Codes - Street Tree Standards, Appeals, and Adopt-A-Tree Fund]

Ordinance amending the Public Works Code to allow development projects to satisfy street tree planting requirements through payment of an in lieu fee or providing alternative landscaping; exempt accessory dwelling units from street tree planting requirements; eliminate appeals to the Board of Appeals and the Director of the Department of Public Works for hazardous tree removals undertaken by City departments and commissions; amending the Administrative Code to specify a separate account within the Adopt-A-Tree Fund to receive in lieu fees for street tree requirements; amending the Planning Code to update street tree applicability requirements; amending the Business and Tax Regulations Code to prescribe timeframes for the hearing and decision on appeals of certain street tree removals to the Board of Appeals; affirming the Planning Department's determination under the California Environmental Quality Act; making findings of consistency with the General Plan, and the eight priority policies of Planning Code, Section 101.1; and making public necessity, convenience, and welfare findings under Planning Code, Section 302.

NOTE: **Unchanged Code text and uncodified text** are in plain Arial font.
Additions to Codes are in *single-underline italics Times New Roman font*.
Deletions to Codes are in ~~*strikethrough italics Times New Roman font*~~.
Board amendment additions are in double-underlined Arial font.
Board amendment deletions are in ~~strikethrough Arial font~~.
Asterisks (* * * *) indicate the omission of unchanged Code subsections or parts of tables.

Be it ordained by the People of the City and County of San Francisco:

Section 1. Environmental and Land Use Findings.

(a) The Planning Department has determined that the actions contemplated in this

ordinance comply with the California Environmental Quality Act (California Public Resources Code Sections 21000 et seq.). Said determination is on file with the Clerk of the Board of Supervisors in File No. 251211 and is incorporated herein by reference. The Board affirms this determination.

(b) On March 12, 2026, the Planning Commission, in Resolution No. 21898, adopted findings that the actions contemplated in this ordinance are consistent, on balance, with the City's General Plan and eight priority policies of Planning Code, Section 101.1. The Board adopts these findings as its own. A copy of said Resolution is on file with the Clerk of the Board of Supervisors in File No. 251211, and is incorporated herein by reference.

(c) Pursuant to Planning Code, Section 302, this Board finds that this ordinance will serve the public necessity, convenience, and welfare for the reasons set forth in Planning Commission Resolution No. 21898, and incorporates such reasons by this reference thereto. A copy of said resolution is on file with the Clerk of the Board of Supervisors in File No. 251211.

Section 2. Background and Findings.

(a) San Francisco's urban forest creates a more walkable, livable, and sustainable city. Trees and other vegetation clean the air and water, create greener neighborhoods, calm traffic, improve public health, provide wildlife habitat, and absorb greenhouse gases. Annually, the benefits provided by trees in San Francisco are estimated at over $100 million. However, with just over 125,000 trees, San Francisco's tree canopy—measured by the amount of land covered by trees when viewed from above—is just 13.7%, one of the smallest of any major city in the United States.

(b) Article 16 of the Public Works Code—the Urban Forestry Ordinance—seeks to "[t]o promote efficient, cost effective management of the City's urban forest by coordinating public

and private efforts within a comprehensive and professional management system." Private parties planting and maintaining new street trees is a key strategy of the 2014 Urban Forestry Plan, on file with the Clerk of the Board of Supervisors in File No. 141264, and the 2010 Better Streets Plan, on file with the Clerk of the Board of Supervisors in File No. 101194. To this end, since 2010, the Public Works Code (previously the Planning Code) has required development applicants to plant one street tree for every 20 feet of lot frontage.

(c) Alternatives to street tree planting, which include payment of an in lieu fee or provision of alternative sidewalk landscaping, are currently limited to situations where the Director of Public Works determines that planting a street tree in the required fashion is impossible, impractical, and/or unsafe. The Public Works Code sets the in lieu fee in an amount equal to the Department's cost to plant and water a tree for three years—the period necessary to establish a street tree. The current in lieu fee amount is $2,590, subject to annual inflation adjustments, as detailed further in the Public Works Fee Study and Street Tree In Lieu Fee Calculation matrix, both of which are on file with the Clerk of the Board of Supervisors in File No. 251211 and incorporated herein by reference. In lieu fees are deposited into the Adopt-A-Tree Fund, proceeds of which are used to fund the Department's planting and maintenance of new street trees.

(d) Except for large projects that meet the criteria for Better Streets Plan improvements in Planning Code Section 138.1(c)(2)(A), this ordinance enables certain development projects to satisfy the street tree planting requirements through payment of an in lieu fee, without a finding that tree planting is impossible, impractical, and/or unsafe. In situations where planting the street tree would be impossible, impracticable, and/or unsafe, this ordinance would allow a development application to satisfy the street tree planting requirement by planting alternative sidewalk landscaping, as defined in the ordinance. This ordinance also exempts Accessory Dwelling Units and Junior Accessory Dwelling Units ("ADU/JADU") from the street tree

requirements. By expanding the availability of the in lieu fee option, defining appropriate street tree planting requirements, and exempting ADU/JADUs, this ordinance promotes efficiency and certainty in the development process, one of the key goals of the Permit SF initiative.

(e) The City's current position is that the street tree in lieu fee is not subject to the requirements of the Mitigation Fee Act, Government Code Sections 66000 et seq. Nonetheless, this in lieu fee is supported by the 2021 Citywide Infrastructure Nexus Study, adopted in Ordinance No. 193-23 in Board File No. 230764, which analyzed street tree planting as an element of San Francisco's sustainable streets infrastructure. The findings of the 2021 Citywide Infrastructure Nexus Study and the accompanying Level of Service Analysis are hereby incorporated by reference. This ordinance does not establish, increase, or impose a fee within the meaning of Government Code Section 66001(a). The in lieu fee in this ordinance remains equal to the Department's cost of planting and watering a street tree for three years, which bears a reasonable relationship to the impact of the foregone street tree, as detailed further in the Street Tree In Lieu Fee Calculation matrix.

(f) This ordinance prescribes timeframes for the hearing and decision by the Board of Appeals on street tree removals undertaken by a City agency, commission, or department. However, in situations where a street tree poses a safety hazard, prompt decisionmaking is necessary to ensure public safety. To that end, this ordinance eliminates the ability for a member of the public to appeal such a hazardous tree removal and thereby delay the removal of the hazard.

Section 3. Article 16 of the Public Works Code is hereby amended by revising Sections 802, 806, and 807, to read as follows:

SEC. 802. DEFINITIONS.

* * * *

"In-lieu fee" shall mean a fee *imposed and* deposited into the Adopt-A-Tree Fund ~~*and imposed by the Director*~~ *pursuant to Section 806*. ~~*The in-lieu fee shall be equal to the replacement value of a tree(s) to be removed or trees that have been destroyed or as otherwise specified in Section 811. In the case of trees required to be planted by Section 805 or 806, yet excused by the Director through a waiver or modification, the In-lieu fee shall be equal to the City's cost to plant and water a tree for three years. The minimum In-lieu fee shall be $1,489.00. Beginning with fiscal year 2007-2008, this fee shall be reviewed and adjusted each year in accordance with the procedures set forth in Public Works Code Section 2.1.2.*~~

* * * *

SEC. 806. PLANTING AND REMOVAL OF STREET TREES.

(a) **Planting and Removal by the Department.**

(1) **Planting**. The Department may determine to plant a new climate appropriate Tree(s) in a Sidewalk or public right-of-way. When the Department determines to plant a new Street Tree(s), the Department will undertake Maintenance responsibility for such new Street Tree and shall send a courtesy Notice to the abutting property owner prior to Planting such new Tree. Any objections to the proposed work must be submitted to the Director in writing and postmarked within 30 days after Notice by the Director. The Director shall consider such objections and may hold a hearing, in the Director's discretion. The Director's decision on the matter shall be final and nonappealable.

(2) **Removal of Street Trees.** The Department may not cut down or remove a Street Tree, unless 30 days prior to the Removal date, the Department notifies all Interested San Francisco organizations and, to the extent practical, all owners and occupants of

properties that are on or across from the block face where the affected Tree is located. In addition, 30 days prior to the Removal date, the Department shall post a notice on the affected Tree. *This subsection (a)(2) shall not apply to Removal of Hazard Trees.*

(3) **Appeal of Tree Removal.**

(A) If within 30 days after the giving of Notice for Street Tree Removal, as specified in subsection (a)(2), ~~*or if within 15 days after the giving of notice for Removal of a hazard Street Tree, as specified in Subsection (a)(4),*~~ any Person files with the Department written objections to the Removal, the Director shall hold a hearing to consider public testimony concerning the proposed Tree Removal. Written Notice of the date, time, and place of the hearing shall be posted on the affected Tree *and the Department's website*, ~~*provided in a newspaper of general circulation*~~, and sent to the objecting party, the owner of the property abutting the affected Tree, and all Interested San Francisco organizations, not less than seven days prior thereto.

(B) The Director shall issue a written decision and order on the objections after the public hearing specified above.

(C) The Director's decision shall be final and appealable to the Board of Appeals.

(4) **Removal of Hazard Street Trees.**

(A) No Hazard Street Tree shall be cut down or removed by the Department unless:

(i) The Department gives 15 days' prior written Notice to the owner of the property abutting the affected Tree; and

(ii) Fifteen days prior to the Removal date, the Department notifies all Interested San Francisco organizations and, to the extent practical, owners and occupants of properties that are on or across the block face where the affected Tree is

located. In addition, 15 days prior to the Removal date, the Department shall post a notice on the affected Tree.

(B) *The Department's decision on Removal of a Hazard Street Tree shall be final and nonappealable.*

(C) Hazard Street Tree shall have the same meaning as Hazard Tree in Section 802 except that a Hazard Street Tree is located within the public right-of-way.

(5) **Emergency Removal.** In the case of manifest danger and immediate necessity, as determined by the Director, the Department may remove any Street Tree immediately. After such emergency Removal, the Department shall provide Notice of the necessity for such action to the owner of the property abutting the affected Tree, all Interested San Francisco organizations and, to the extent practical, all owners and occupants of properties that are on or across from the block face where the affected Tree was removed.

* * * *

(c) **Planting and Removal by City Agencies, Commissions, or Other Departments**. If a City agency, commission, or department other than the Department of Public Works desires to plant or remove a Street Tree, such agency, commission, or department shall be subject to the provisions of ~~S~~*s*ubsection (b) *of this Section 806*; provided, however, that for purposes of Street Tree Removal, the notice and procedures for Director's hearings set forth in ~~S~~*s*ubsections (a)(2) and (a)(3) shall apply.

(d) **Required Street Trees for Development Projects**. The Director shall require Street Trees for the development projects as set forth in this ~~S~~*s*ubsection (d).

(1) **Applicability**. This ~~S~~*s*ubsection *(d)* shall apply to development projects that involve any of the following *except the construction of an Accessory Dwelling Unit and/or Junior Accessory Dwelling Unit, as those terms are defined in Planning Code Section 102*:

(A) the construction of a new building;

(B) the addition of a dwelling unit;

(C) the addition of a new curb-cut;

(D) the addition of a garage; and/or

(E) a net addition to an existing building of 500 gross square feet or more.

(2) **Number of Trees Required**. The Director shall require one Street Tree for each 20 feet of Street frontage of the property containing the development project, with any remaining fraction of 10 feet or more of frontage requiring an additional Tree. Any existing Street Trees located within the public right-of-way along such property that have been protected during construction and that the Director does not recommend~~ed~~ for Removal, shall count toward meeting the requirement.

(3) **Standards for Required Trees**. New Street Trees that the Director requires to be planted under this Subsection shall:

(A) be planted within the public right-of-way adjacent to the property containing the development project;

(B) be of a species suitable for the site conditions;

(C) be a minimum of 24-inch box size;

(D) have a minimum 1 1/4-inch caliper, measured at 6-inches above ground;

(E) be planted no higher than the adjacent Sidewalk and provide a below-grade environment with nutrient-rich soils, free from overly-compacted soils, and generally conducive to Tree root development; and

(F) be watered, maintained, and replaced if necessary by the property owner, in accordance with this Article 16, and be in compliance with applicable water use requirements of Administrative Code Chapter 63.

(4) ***Alternatives to New Street Trees*** ~~*Waivers and Modifications*~~. *An applicant may satisfy some or all of the requirements of subsection (d)(2)* ~~*The Director may waive or modify the number of and/or standards for Street Trees required pursuant to this Ssubsection only*~~ as described below:

(A) ***In-Lieu Fee.*** ~~*The Director, in his or her sole discretion, may waive or modify the requirements of this subsection when inadequate Sidewalk width or interference with driveways, sub-sidewalk basements, or other pre-existing surface, sub-surface, or above-grade features render installation of the required Street Tree(s) in the required fashion impossible, impractical, and/or unsafe.*~~ *Except as provided in subsection (d)(4)(A)(i), f*~~*F*~~or each required Street Tree ~~*that the Director waives,*~~ the applicant~~*, at his or her choosing, shall either (i)*~~ *may elect to* pay an In-lieu fee. *The In-lieu fee shall be equal to the City's cost to plant and water a tree for three years. The In-lieu fee shall be $2,590 for Fiscal Year 2025-2026. This fee shall be reviewed and adjusted each year as provided in Public Works Code Section 2.1.2*. ~~*pursuant to Section 802 or (ii) to fulfill all or a portion of the requirement, provide alternative landscaping, including but not limited to Sidewalk landscaping, in amount comparable to or greater than the number of Street Trees waived; or*~~

(i) ***Large Projects****. Projects meeting the criteria in Planning Code Section 138.1(c)(2)(A)(i) shall be ineligible for the In-lieu fee in subsection (d)(4)(A) unless the Director determines that inadequate Sidewalk width or interference with driveways, sub-sidewalk basements, or other pre-existing surface, sub-surface, or above-grade features render installation of the required Street Tree(s) in the required fashion impossible, impractical, and/or unsafe.*

(B) ***Alternative Landscaping.*** ~~*Only in those extraordinary and unusual circumstances where an applicant successfully demonstrates that an overriding City policy renders the Planting of the required Street Tree(s) inappropriate and both the Director and the Director of Planning concur, the Director may waive one or more required Street Trees.*~~ *If the Director determines that inadequate Sidewalk width or interference with driveways, sub-sidewalk basements, or other pre-*

existing surface, sub-surface, or above-grade features render installation of the required Street Tree(s) impossible, impractical, and/or unsafe, ~~*If*~~for each required Street Tree ~~*that the Director waives, the Director, in his or her sole discretion, shall require that*~~ the applicant ~~*either*~~ *may elect to* ~~*(i) pay an In-lieu fee pursuant to Section 802 or (ii)*~~ fulfill all or a portion of the requirement by providing alternative landscaping *that complies with all of the following:*~~*, including but not limited to Sidewalk landscaping, in amount comparable to or greater than the number of Street Trees waived.*~~

(i) the water use requirements of Chapter 63 of the Administrative Code;

(ii) applicable provisions of Public Works Code Section 810B;

(iii) a minimum area of 75 square feet of sidewalk landscaping for each required Street Tree that cannot be planted; and

(iv) applicable requirements in the Director's Order on Tree Planting (Director's Order No. 187,246) and any successor order.

(5) Administration of the In Lieu Fee.

(A) ***Deposit****. The In-lieu fees collected pursuant to subsection (d)(4) shall be deposited into a separate account within the Adopt-A-Tree fund under Section 10.100-227 of the Administrative Code. All funds therein shall be appropriated to fund the planting and watering of Street Trees in accordance with the law.*

(B) ***Collection****. If a project applicant elects to pay the In lieu fee in subsection (d)(4) at the time of Development Application, as that term is defined in Planning Code Section 102, the Planning Department shall provide notice to the Department of Building Inspection's Development Fee Collection Unit in accordance with the procedures set forth in Section 402 of the Planning Code. If a project applicant elects to pay the In-lieu fee in subsection (d)(4) after approval of a Development Application, the Department shall provide notice to the Development Fee Collection Unit. The Development Fee Collection Unit shall collect the In-lieu fee in accordance with Section 107A.13 of the San Francisco Building Code.*

SEC. 807. DEPARTMENT OF PUBLIC WORKS URBAN FORESTRY PROGRAM; POWERS AND DUTIES.

* * * *

(d) **Authority over Site Development Plans.**

(1) The Department shall have the authority to review and comment on site development plan applications received by the City's Central Permit Bureau that pertain to the planting, alteration, or removal of street trees. The Department shall also have the authority to review and comment on site development plan applications that pertain to the alteration or removal of landmark trees designated pursuant to Section 810(a) of this Article 16 and significant trees pursuant to Section 810A of this Article. Protection of such trees during construction shall be required in accordance with Section 808(c) of this Article. Removal of such trees shall be subject to the applicable rules and procedures for removal set forth in Sections 806, 810, or 810A of this Article.

(2) *The Department shall transmit annually the amount of the In-lieu fee in Section 806(d)(4) to the Planning Department for inclusion on the Development Impact Fee Register.* ~~*If the Director modifies or waives the requirements of Section 806(d) in accordance with subsection 806(d)(4), the Department shall impose an in-lieu fee on the property owner so excused.*~~

(3) If an applicant elects to provide alternative landscaping pursuant to Section 806(d)(4)(B), the Department shall determine whether the proposed alternative landscaping complies with the required standards.

(e) **Public Works Adopt-A-Tree Fund.** Pursuant to Section 10.100-227 of the Administrative Code, the Department shall maintain the Public Works Adopt-A-Tree Fund to enhance the urban forestry program.

(f) ~~*In Lieu*~~***Tree*** **Planting Program**. The Department shall develop and implement an

~~*In-Lieu*~~ *Tree* Planting Program to offset the loss of street trees, significant trees, and landmark trees due to removal, destruction, or death. *The Tree Planting Program shall be funded through: (1) fees or penalties assessed pursuant to Section 811 as mitigation for violation of the requirements in this Article 16; (2) In-lieu fees paid pursuant to Section 806; and (3) funds from the Tree Adoption Program described in subsection (g).* The ~~*In-Lieu*~~*Tree* Planting Program also shall compensate for ~~*the loss of*~~ *Street* ~~*t*~~*T*rees required to be planted by Section 806(d) *for which the applicant has elected to pay an In-lieu fee. The Department shall use funds from In-lieu fees to plant and water trees for three years.* ~~*, unless the Director has modified or waived such requirements under subsection 806(d)(4). The Department shall impose an in-lieu fee in accordance with a fee schedule adopted by the Director where a street tree is destroyed, removed, or is excused from planting where otherwise required by Section 806(d). The Department also shall assess an in-lieu fee or such other penalty as set forth in Section 811 as mitigation for violation of the requirements of this Article 16. The Department shall follow the requirements set forth herein for payment of an in-lieu fee unless it makes written findings detailing the basis for waiving said requirements. As set forth in Section 811, in lieu fees shall be deposited in the Public Works Adopt-A-Tree Fund.*~~

(g) **Tree Adoption Program**. The Department shall develop and implement a tree adoption program to allow persons to donate money for the purpose of tree planting and maintenance. Money donated to the City and County for the purpose of tree planting and maintenance shall be deposited into the Public Works Adopt-A-Tree Fund.

Section 4. Chapter 10, Article XIII of the Administrative Code is amended by revising Section 10.100-227, to read as follows:

SEC. 10.100-227. PUBLIC WORKS ADOPT-A-TREE FUND.

(a) **Establishment and Use of Fund.** The Public Works Adopt-A-Tree Fund is

established as a category eight fund to receive all monetary donations, administrative fees, permit fees, fines, liens, and in-lieu fees pursuant to Article 16 of the Public Works Code which may be offered to or collected by the City and County for the planting and maintenance of trees by the Department of Public Works. *Within the Adopt-A-Tree Fund, there shall be a separate account to receive all in lieu fees paid pursuant to Section 806(d)(4)(A) of the Public Works Code and all interest received thereon.*

(b) **Use of Fund.** The fund shall be expended solely for the purposes of planting and maintaining trees under the jurisdiction of the Department of Public Works. *For in lieu fees paid pursuant to Section 806(d)(4)(A) of the Public Works Code, the funds shall be used solely to plant and water trees for three years.*

(c) **Administration of Fund.** The Department of Public Works shall submit to the Board of Supervisors on a quarterly basis a written report of revenues to and expenditures from the fund.

Section 5. Article 1.2 of the Planning Code is amended by revising Section 138.1, to read as follows:

SEC. 138.1. STREETSCAPE AND PEDESTRIAN IMPROVEMENTS.

* * * *

(c) **Required streetscape and pedestrian improvements**. Development projects shall include streetscape and pedestrian improvements on all publicly accessible right-of-ways directly fronting the property as follows:

(1) **Street trees**. Project Sponsors shall plant and establish street trees as set forth in Article 16, Sections 805(a) and 806(d) of the Public Works Code; provided, however, that ~~*where*~~ a property owner ~~*is either (A) adding an Accessory Dwelling Unit pursuant to Section 207.1 or 207.2 of this Code or (B) legalizing a Dwelling Unit pursuant to Section 207.3 of this Code,*~~

~~*the owner*~~ may elect to*:*

(A) pay the in-lieu fee*, as* authorized by Section *806(d)(4)(A)* ~~*807(f)*~~ of the Public Works Code*; or,*

(B) in circumstances where tree planting is impossible, impractical, and/or unsafe, provide alternative sidewalk landscaping, as authorized in Section 806(d)(4)(B) of the Public Works Code.

(2) **Other streetscape and pedestrian elements for large projects.**

(A) **Application**.

(i) In any district, streetscape and pedestrian elements in conformance with the Better Streets Plan shall be required, if the following conditions are present:

a. The project is on a lot that is greater than one-half acre in total area; or includes more than 50,000 gross square feet of new construction; or contains 150 feet of total lot frontage on one or more publicly-accessible right-of-ways; or its frontage encompasses the entire block face between the nearest two intersections with any other publicly-accessible right-of-way; and

b. The project includes new construction of 10 or more Dwelling Units; or new construction of 10,000 gross square feet or greater of non-residential space; or an addition of 20% or more of Gross Floor Area to an existing building; or a Change of Use of 10,000 gross square feet or greater of a PDR use to a non-PDR use.

* * * *

Section 6. Article 1 of the Business and Tax Regulations Code is hereby amended by revising Section 8, to read as follows:

SEC. 8. METHOD OF APPEAL TO THE BOARD OF APPEALS.

* * * *

(e) Appeals shall be taken by filing a notice of appeal with the Board of Appeals and paying to said Board at such time a filing fee as follows:

* * * *

(9) Additional Requirements.

* * * *

(C) Except as otherwise specified in this subsection (e)(9)(C), the Board of Appeals shall fix the time and place of hearing, which shall be not less than 10 nor more than 45 days after the filing of said appeal, and shall act thereon not later than 60 days after such filing or a reasonable time thereafter.

* * * *

(v) In the case of a decision of the Director of the Department of Public Works concerning street tree removal by a City agency, commission, or department pursuant to subsections (a) and/or (c) of Public Works Code Section 806, the Board of Appeals shall set the hearing not less than 15 days after the filing of said appeal, shall act thereon not more than 30 days after such filing, and shall not entertain a motion for rehearing.

* * * *

Section 7. Scope of Ordinance. In enacting this ordinance, the Board of Supervisors intends to amend only those words, phrases, paragraphs, subsections, sections, articles, numbers, punctuation marks, charts, diagrams, or any other constituent parts of the Municipal Code that are explicitly shown in this ordinance as additions, deletions, Board amendment additions, and Board amendment deletions in accordance with the "Note" that appears under the official title of the ordinance.

Section 8. Effective Date. This ordinance shall become effective on the 31st day after enactment. Enactment occurs when the Mayor signs the ordinance, the Mayor returns the ordinance unsigned or does not sign the ordinance within ten days of receiving it, or the Board of Supervisors overrides the Mayor's veto of the ordinance.

APPROVED AS TO FORM:
DAVID CHIU, City Attorney

By: /s/ Giulia Gualco-Nelson
GIULIA GUALCO-NELSON
Deputy City Attorney

4912-6302-0985, v. 1

FILE NO. 251211

LEGISLATIVE DIGEST

(Substituted – June 30, 2026)

[Public Works, Administrative, Planning, Business and Tax Regulations Codes - Street Tree Standards, Appeals, and Adopt-A-Tree Fund]

Ordinance amending the Public Works Code to allow development projects to satisfy street tree planting requirements through payment of an in lieu fee or providing alternative landscaping; exempt accessory dwelling units from street tree planting requirements; eliminate appeals to the Board of Appeals and the Director of the Department of Public Works for hazardous tree removals undertaken by City departments and commissions; amending the Administrative Code to specify a separate account within the Adopt-A-Tree Fund to receive in lieu fees for street tree requirements; amending the Planning Code to update street tree applicability requirements; amending the Business and Tax Regulations Code to prescribe timeframes for the hearing and decision on appeals of certain street tree removals to the Board of Appeals; affirming the Planning Department's determination under the California Environmental Quality Act; making findings of consistency with the General Plan, and the eight priority policies of Planning Code, Section 101.1; and making public necessity, convenience, and welfare findings under Planning Code, Section 302.

Existing Law

Decisions on Street Tree Removals

Article 16 of the Public Works Code (Sections 800 et seq.) is the Urban Forestry Ordinance, which regulates the planting and removal of street trees by private parties, the Department of Public Works, and other City agencies and commissions. A Street Tree is "any tree growing within the public right-of-way, including unimproved public streets and sidewalks, and any tree growing on land under the jurisdiction of the Department [of Public Works]." (Public Works Code Section 802.)

Section 806(a)(2) provides that the decision by the Department of Public Works ("Department") to remove a Street Tree is first appealable to the Director of Public Works ("Director"). Section 806(a)(3) prescribes noticing requirements for the hearing on the appeal, which includes posting on the affected Tree and in a newspaper of general circulation, and notice to the objecting party, the owner of the property abutting the affected Tree, and all interested San Francisco organizations, not less than seven days prior to the hearing. After the hearing, the Director of Public Works must issue a written decision, which can then be further appealed to the Board of Appeals.

Section 806(c) applies the same notice and procedure requirements of 806(a)(2) and (a)(3) to decisions by other City departments and agencies to remove a Street Tree.

Section 806(a)(3) and (a)(4) also govern the Department of Public Works' removal of Hazard Trees. A Hazard Tree is a "tree that poses an imminent hazard to person or property." (Public Works Code Section 802.) Prior to removing a Hazard Tree, the Department of Public Works must provide 15 days' written notice on the affected tree, to the owner of the property abutting the affected tree, all interested San Francisco organizations, and to the extent practical, owner and occupants of properties on the block where the affected tree is located. If an objection is filed within those 15 days, the Director of the Department of Public Works must hold a hearing and issue a written decision, which can then be further appealed to the Board of Appeals.

Article 1, Section 8 of the Business and Tax Regulations Code prescribes the method of appeal to the Board of Appeals, including timing requirements for the filing of an appeal.

Required Street Trees for Development Projects

Section 806(d) prescribes Street Tree planting requirements for development projects. Development projects include: the construction of a new building; the addition of a dwelling unit; the addition of a new curb-cut; the addition of a garage; and/or a net addition to an existing building of 500 gross square feet or more. New developments must provide one Street Tree for each 20 feet of street frontage of the property containing the development project, with any remaining fraction of 10 feet or more of frontage requiring an additional tree.

The Director of Public Works may waive or modify this Street Tree planting requirement when (i) inadequate sidewalk width or interference with driveways, sub-sidewalk basements, or other pre-existing surface, sub-surface, or above-grade features render installation of the required Street Tree(s) in the required fashion impossible, impractical, and/or unsafe; or (ii) where an applicant successfully demonstrates that an overriding City policy renders the Planting of the required Street Tree(s) inappropriate. For each required Street Tree that the Director waives, the applicant shall either (i) pay an In-lieu fee; or (ii) to fulfill all or a portion of the requirement, provide alternative landscaping, including but not limited to sidewalk landscaping, in amount comparable to or greater than the number of Street Trees waived.

The In-lieu fee shall be equal to the City's cost to plant and water a tree for three years. (Planning Code Section 802.) The current In-lieu fee is $2,590 and the fee is reviewed and adjusted each year to reflect changes in the relevant Consumer Price Index, as determined by the Controller in accordance with the procedures set forth in Public Works Code Section 2.1.2. The In-lieu fee is deposited into the Adopt-A-Tree Fund, which is established in Administrative Code Section 10.100-227.

Planning Code Section 138.1 prescribes streetscape and pedestrian improvements for new development projects. Planning Code Section 138.1 incorporates the Street Tree planting requirements of Article 16 of the Public Works Code. Planning Code Section 138.1 prescribes additional requirements under the Better Streets Plan for large projects that meet certain size and/or unit thresholds. (See Planning Code Section 138.1(c)(2)(A).)

Amendments to Current Law

Decisions on Street Tree Removals

For Street Tree removals undertaken by the Department, this ordinance would amend the Public Works Code to:

- Replace the requirement that hearing notices be published in a newspaper of general circulation with a requirement that the hearing notice be posted to the Department's website;
- For removal of a Hazard Tree: provide that the Department's decision is final and nonappealable;
- For removal of Street Trees that are not Hazard Trees: prescribe timeframes for an appeal of the Director's decision to the Board of Appeals, specifically that the Board of Appeals shall (1) set the hearing not less than 15 days after the filing of the appeal, (2) take action on the appeal not more than 30 days after such filing, and (3) not accept a motion for rehearing.

For Street Tree removals initiated by other City agencies or commissions, this ordinance would:

- Replace the requirement that hearing notices be published in a newspaper of general circulation with a requirement that the hearing notice be posted to the Department's website; and
- Prescribe timeframes for an appeal of the Director's decision to the Board of Appeals, specifically that the Board of Appeals shall (1) set the hearing not less than 15 days after the filing of the appeal, (2) take action on the appeal not more than 30 days after such filing, and (3) not accept a motion for rehearing.

This ordinance would not change the notice or appeal procedures for Street Tree removals initiated by private parties.

Required Street Trees for Development Projects

This ordinance would also amend the Public Works Code and Planning Code to exempt Accessory Dwelling Units and Junior Accessory Dwelling Units, as defined in Planning Code Section 102, from Street Tree planting requirements.

This ordinance would also enable any development project to pay the In-lieu fee instead of planting the required Street Trees, except for large projects that meet the criteria for Better Streets Plan improvements in Planning Code Section 138.1(c)(2)(A). This ordinance would not change the existing In-lieu fee procedures for those large projects; in those situations, the Director must determine that tree planting is impossible, impractical, and/or unsafe before the applicant can pay the In-lieu fee.

In instances where the Director of Public Works determines that inadequate sidewalk width or interference with driveways, sub-sidewalk basements, or other pre-existing surface, sub-

surface, or above-grade features render installation of the required Street Tree(s) impossible, impractical, and/or unsafe, a development project could elect to provide alternative landscaping that complies with various conditions set forth in the ordinance, including a minimum area of 75 square feet of sidewalk landscaping for each required Street Tree that cannot be planted.

The ordinance also amends the Public Works Code and the Administrative Code to prescribe procedures for the collection and deposit of In-lieu fees into the Adopt-A-Tree Fund.

Background Information

This ordinance contains findings that document how San Francisco's urban forest creates a more walkable, livable, and sustainable city. However, with just over 125,000 trees, San Francisco's tree canopy—measured by the amount of land covered by trees when viewed from above—is just 13.7%, one of the smallest of any major city in the United States. The findings detail how the ordinance balances the need to grow the City's tree canopy with the need to promote efficiency and certainty in the development process. Expanding the availability of the in lieu fee to all new developments and streamlining hearings on City agency removals of street trees successfully balances these needs.

This ordinance (version 2) was substituted on June 30, 2026 for version 1 of the ordinance, introduced on December 9, 2025.

4911-6602-7705, v. 1

Street Trees Legislation - Summary of Proposed Amendments

	Existing Code	**Original Proposal** (12/9/25 Version 1)	**Proposed Amendments** (Substitute Version 2 & proposed Committee amendments)
In-Lieu Fee	All projects subject to tree planting requirements must plant trees unless impossible, impractical, or unsafe.	All projects subject to tree planting requirements may elect to fee out.	Large projects (those subject to Better Streets Plan requirements) would not be able to fee out unless planting is not possible. Smaller projects could still elect to fee out.
Street Tree Removal on City Land	Removals of street trees are subject to: (1) 30-day notice period, (2) appeal to Director of Public Works, and (3) appeal to Board of Appeals.	Eliminated appeals for City-initiated removals on City land.	Appeals are restored. Appeals to the Board of Appeals must be scheduled within 15 days of filing and acted upon within 30 days of filings.
Hazard Tree Removals	Removals of hazard street trees subject to: (1) 15-day notice period, (2) appeal to Director of Public Works, and (3) appeal to Board of Appeals.	Eliminated appeals for removals of hazard street trees.	**[Sup. Mahmood Amendment to be made in Committee]** Removals of hazard street trees subject to: (1) 15-day notice period, (2) appeal to Director of Public Works, but no appeal to Board of Appeals.
Other	-	-	Clarify and reduce redundancy in Planning Code language.

San Francisco Planning

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March 23, 2026

Ms. Angela Calvillo, Clerk
Honorable Mayor Lurie
City and County of San Francisco
City Hall, Room 244
1 Dr. Carlton B. Goodlett Place
San Francisco, CA 94102

Re: **Transmittal of Planning Department Case Number 2025-012149PCA:**
Public Works, Administrative, Planning Codes - Street Trees
Board File No. 251211

Planning Commission Action: **Adopted a Recommendation for Approval with Modification**

Dear Ms. Calvillo and Mayor Lurie,

On March 12, 2026, the Planning Commission conducted a duly noticed public hearing at a regularly scheduled meeting to consider the proposed Ordinance, introduced by Mayor Lurie, which would amend Section 138.1 of the Planning Code to projects to meet street tree obligations through the payment of an in-lieu fee and reference relevant sections of the Public Works Code, also amended by the Ordinance. At the hearing the Planning Commission adopted a recommendation for approval with modification.

The Commission's proposed modifications were as follows:

- Specify that legalizations of unauthorized dwelling units are exempt from street tree planting requirements in Public Works Code section 806(d)(1), in addition to existing provisions exempting Accessory Dwelling Units.

The proposed amendments are not defined as a project under CEQA Guidelines Section 15060(c) and 15378 because they do not result in a physical change in the environment.

Mayor, please advise the City Attorney at your earliest convenience if you wish to incorporate the changes recommended by the Commission.

Please find attached documents relating to the actions of the Commission. If you have any questions or require further information please do not hesitate to contact me.

Sincerely,

Lisa Gluckstein
Manager of Government Affairs

cc: Giulia Gualco-Nelson, Deputy City Attorney
Adam Thongsavat, Aide to Mayor Lurie
John Carroll, Office of the Clerk of the Board

ATTACHMENTS :

Planning Commission Resolution
Planning Department Executive Summary

San Francisco Planning

49 South Van Ness Avenue, Suite 1400
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PLANNING COMMISSION RESOLUTION NO. 21898

HEARING DATE: March 12, 2026

Project Name:	Public Works, Administrative, Planning Codes - Street Trees
Case Number:	2025-012149PCA
Initiated by:	Mayor Lurie
Staff Contact:	Lisa Gluckstein, Legislative Affairs Lisa.Gluckstein@sfgov.org; 628-652-7475

RESOLUTION ADOPTING A RECOMMENDATION FOR APPROVAL OF A PROPOSED ORDINANCE THAT WOULD AMEND THE PUBLIC WORKS CODE TO ALLOW DEVELOPMENT PROJECTS TO SATISFY STREET TREE PLANTING REQUIREMENTS THROUGH PAYMENT OF AN IN LIEU FEE OR PROVIDING ALTERNATIVE LANDSCAPING; EXEMPT ACCESSORY DWELLING UNITS FROM STREET TREE PLANTING REQUIREMENTS; ELIMINATE APPEALS TO THE BOARD OF APPEALS FOR TREE REMOVALS UNDERTAKEN BY CITY DEPARTMENTS AND COMMISSIONS; AND UPDATE IN LIEU FEE REPORTING REQUIREMENTS; AMENDING THE ADMINISTRATIVE CODE TO CREATE A SEPARATE ACCOUNT WITHIN THE ADOPT-A-TREE FUND TO RECEIVE IN LIEU FEES FOR STREET TREE REQUIREMENTS; AMENDING THE PLANNING CODE TO UPDATE STREET TREE APPLICABILITY REQUIREMENTS; AFFIRMING THE PLANNING DEPARTMENT'S DETERMINATION UNDER THE CALIFORNIA ENVIRONMENTAL QUALITY ACT; MAKING FINDINGS OF CONSISTENCY WITH THE GENERAL PLAN, AND THE EIGHT PRIORITY POLICIES OF PLANNING CODE, SECTION 101.1; AND MAKING FINDINGS OF PUBLIC NECCESSITY, CONVENIENCE, AND WELFARE UNDER PLANNING CODE, SECTION 302.

WHEREAS, on December 9, 2025 Mayor Lurie introduced a proposed Ordinance under Board of Supervisors (hereinafter "Board") File Number 251211, which would amend Section 138.1 of the Planning Code to projects to meet street tree obligations through the payment of an in-lieu fee and reference relevant sections of the Public Works Code, also amended by the Ordinance;

WHEREAS, the Planning Commission (hereinafter "Commission") conducted a duly noticed public hearing at a regularly scheduled meeting to consider the proposed Ordinance on March 12, 2026; and,

WHEREAS, the proposed Ordinance has been determined to be categorically exempt from environmental review under the California Environmental Quality Act Section 15378 and 15060(c); and

WHEREAS, the Planning Commission has heard and considered the testimony presented to it at the public hearing and has further considered written materials and oral testimony presented on behalf of Department staff and other interested parties; and

WHEREAS, all pertinent documents may be found in the files of the Department, as the Custodian of Records, at 49 South Van Ness Avenue, Suite 1400, San Francisco; and

WHEREAS, the Planning Commission has reviewed the proposed Ordinance; and

WHEREAS, the Planning Commission finds from the facts presented that the public necessity, convenience, and general welfare require the proposed amendment; and

MOVED, that the Planning Commission hereby adopts a **recommendation for approval with modifications** of the proposed ordinance. The Commission's proposed recommendation is as follows:

- Specify that legalizations of unauthorized dwelling units are exempt from street tree planting requirements in Public Works Code section 806(d)(1), in addition to existing provisions exempting Accessory Dwelling Units.

Findings

Having reviewed the materials identified in the preamble above, and having heard all testimony and arguments, this Commission finds, concludes, and determines as follows:

The Commission finds that the proposed Ordinance allows for increased project flexibility and administrative efficiency while also advancing the City's proactive urban forestry goals. The creation of an in-lieu fee option provides project sponsors—especially those with small-scale residential projects—a predictable alternative to the existing street tree permitting process. This reduces the burden on individual property owners, offering project flexibility that can expedite development. Crucially, the pooled in-lieu fees will be dedicated to a separate account within the Adopt-A-Tree Fund, creating a sustainable funding stream. This resource enhances the Bureau of Urban Forestry's capacity to pursue proactive, city-led tree planting and essential maintenance at scale, which is necessary to achieve the Urban Forest Plan's goal of increasing the city's tree canopy. Furthermore, by directing funds towards Public Works' proactive efforts, the Ordinance advances racial and social equity by allowing the City to pursue planting in low-canopy areas, addressing existing disparities.

General Plan Compliance

The proposed Ordinance and the Commission's recommended modifications are consistent with the following Objectives and Policies of the General Plan:

URBAN DESIGN ELEMENT

Policy 1.4
PROTECT AND PROMOTE LARGE-SCALE LANDSCAPING AND OPEN SPACE THAT DEFINE DISTRICTS AND TOPOGRAPHY.

By creating a predictable in-lieu fee option, the ordinance ensures a steady funding stream for large-scale

City-led tree planting efforts that enhance neighborhood character and citywide landscape identity. Redirecting responsibility from individual property owners to Public Works supports more consistent, coordinated planting aligned with long-term urban design objectives. The ordinance therefore advances the preservation and expansion of district-defining tree canopy in keeping with Policy 1.4.

RECREATION & OPEN SPACE ELEMENT

OBJECTIVE 4
PROTECT AND ENHANCE BIODIVERSITY AND ENCOURAGE SUSTAINABLE PRACTICES

Policy 4.3
Integrate the protection and restoration of local biodiversity into open space construction, renovation, management, and maintenance

The Ordinance promotes Policy 4.3 by enabling Public Works to use in-lieu fees for planting and watering trees for three years, ensuring that new trees receive the early care necessary for long-term ecological health. Allowing alternative landscaping in situations where trees cannot be planted ensures continuous biodiversity-supportive improvements even when project-level constraints exist. These provisions strengthen the City's capacity to restore and manage its urban forest as a cohesive, sustainable system.

HOUSING ELEMENT

Policy 27
Improve coordination, alignment, shared mission, and functionality of post-entitlement permit processes across agencies and jurisdictions to speed housing construction starts, especially for 100% affordable housing and development agreements.

The ordinance supports Policy 27 by simplifying post-entitlement requirements through the option to satisfy tree-planting obligations with an in-lieu fee, avoiding lengthy permitting processes. By reducing inter-agency bottlenecks and creating a clearer, more predictable process for applicants, the ordinance enhances coordination between Planning, Public Works, and the Department of Building Inspection. This streamlined framework helps accelerate construction starts for all projects, including affordable housing, by minimizing unexpected final-stage delays.

Policy 31
Facilitate small and mid-rise multi-family buildings that private development can deliver to serve middle-income households without deed restriction, including through adding units in lower-density areas or by adding ADUs.

By exempting new Accessory Dwelling Units and Junior Accessory Dwelling Units from street tree requirements, the ordinance removes a cost and permitting barrier that can discourage small-scale infill projects. Providing an in-lieu fee alternative for other eligible projects further reduces administrative burdens that often disproportionately affect small and mid-rise multifamily development. These changes help enable modest, incremental housing additions—particularly ADUs and small-scale expansions—consistent with Policy 31's goal of expanding middle-income housing opportunities.

Planning Code Section 101 Findings

The proposed amendments to the Planning Code are consistent with the eight Priority Policies set forth in Section 101.1(b) of the Planning Code in that:

1. That existing neighborhood-serving retail uses be preserved and enhanced and future opportunities for resident employment in and ownership of such businesses enhanced;

   The proposed Ordinance would not have a negative effect on neighborhood serving retail uses and will not have a negative effect on opportunities for resident employment in and ownership of neighborhood-serving retail.

2. That existing housing and neighborhood character be conserved and protected in order to preserve the cultural and economic diversity of our neighborhoods;

   The proposed Ordinance would not have a negative effect on housing or neighborhood character.

3. That the City's supply of affordable housing be preserved and enhanced;

   The proposed Ordinance would not have an adverse effect on the City's supply of affordable housing.

4. That commuter traffic not impede MUNI transit service or overburden our streets or neighborhood parking;

   The proposed Ordinance would not result in commuter traffic impeding MUNI transit service or overburdening the streets or neighborhood parking.

5. That a diverse economic base be maintained by protecting our industrial and service sectors from displacement due to commercial office development, and that future opportunities for resident employment and ownership in these sectors be enhanced;

   The proposed Ordinance would not cause displacement of the industrial or service sectors due to office development, and future opportunities for resident employment or ownership in these sectors would not be impaired.

6. That the City achieve the greatest possible preparedness to protect against injury and loss of life in an earthquake;

   The proposed Ordinance would not have an adverse effect on City's preparedness against injury and loss of life in an earthquake.

7. That the landmarks and historic buildings be preserved;

   The proposed Ordinance would not have an adverse effect on the City's Landmarks and historic buildings.

8. That our parks and open space and their access to sunlight and vistas be protected from

development;

The proposed Ordinance would not have an adverse effect on the City's parks and open space and their access to sunlight and vistas.

Planning Code Section 302 Findings.

The Planning Commission finds from the facts presented that the public necessity, convenience and general welfare require the proposed amendments to the Planning Code as set forth in Section 302.

NOW THEREFORE BE IT RESOLVED that the Commission hereby ADOPTS A RECOMMENDATION FOR APPROVAL WITH MODIFICATIONS of the proposed Ordinance as described in this Resolution.

I hereby certify that the foregoing Resolution was adopted by the Commission at its meeting on March 12, 2026.



Jonas P. Ionin
Commission Secretary

AYES:	McGarry, So, Braun, Campbell
NOES:	Williams, Imperial
ABSENT:	Moore
ADOPTED:	March 12, 2026

San Francisco Planning

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EXECUTIVE SUMMARY
PLANNING CODE TEXT AMENDMENT

HEARING DATE: March 12, 2026

90-Day Deadline: March 19, 2026

Project Name:	Public Works, Administrative, Planning Codes - Street Trees
Case Number:	2025-012149PCA [Board File No. 251211]
Initiated by:	Mayor Lurie / Introduced December 9, 2025
Staff Contact:	Gluckstein, Legislative Affairs sfgov.org; 628-652-7475
Environmental Review:	Not a Project Under CEQA

RECOMMENDATION: **Adopt a Recommendation for Approval**

Planning Code Amendment

The proposed Ordinance would amend the Public Works Code to allow development projects to satisfy street tree planting requirements through payment of an in lieu fee or providing alternative landscaping; exempt accessory dwelling units from street tree planting requirements; and update in lieu fee reporting requirements; amending the Administrative Code to create a separate account within the Adopt-A-Tree Fund to receive in lieu fees for street tree requirements. It would amend the Planning Code to update street tree applicability requirements in line with the aforementioned amendments.

Note that this Ordinance would also modify how appeals to the Board of Appeals for tree removals are undertaken by City departments and commissions, however, that item is beyond the scope of the Commission's review.

The Way It Is Now:

1. The Planning Code requires certain development projects to plant street trees in accordance with the Public Works Code. Under the Public Works Code, one street tree is required for every 20 feet of linear frontage for development projects that (a) construct a new building, (b) add a dwelling unit, (c) add a

curb cut, (d) add a garage, or (e) add 500 gross square feet or more to an existing building.

2. Payment of an in-lieu fee in satisfaction of this tree planting requirement is only authorized when: (1) the project is constructing new accessory dwelling units (ADUs) or the legalizing existing unauthorized dwelling units, (2) the Public Works Director determines that planting of a street tree is impossible, impractical, or unsafe, or (3) the Planning Director and Public Works director agree that overriding City policy renders tree planting inappropriate. Under scenario (3), the Public Works Director may alternatively authorize the planting of alternative landscaping in lieu of a street tree.

3. The Department of Public Works assesses in-lieu fees at the post-entitlement permitting phase prior to the issuance of building permits.

4. In-lieu fees are deposited in the Adopt-A-Tree Fund to be expended solely for the purposes of planting and maintaining trees under the jurisdiction of the Department of Public Works.

The Way It Would Be:

1. New construction Accessory Dwelling Units and Junior Accessory Dwelling Units would be exempt from tree planting requirements under the Public Works Code to align with state law. The criteria for calculating required trees would otherwise remain unchanged.

2. The Planning Code would allow certain development projects to either plant street trees in accordance with existing Public Works Code requirements **or** pay the applicable in-lieu fee ($2,590 per tree for 2025-26). Additionally, in circumstances where tree planting is impossible, impractical, or unsafe, the project would be able to satisfy the tree planting requirement through alternative sidewalk landscaping, subject to Public Works Director specifications.

3. If a project elects to pay the in-lieu fee, the Planning Department would notify the Department of Building Inspection of this fee obligation alongside other development fees.

4. In-lieu fees collected under this program would be deposited into a separate account within the Adopt-A-Tree Fund and would be expended solely for the purposes of planting and watering trees for three years. These fees would be subject to annual Controller's Office reporting.

Background

This Ordinance is part of Mayor Lurie's PermitSF initiative, a citywide effort to modernize and streamline San Francisco's permitting and regulatory processes to reduce delays, improve customer experience, and increase predictability in the City's development review system. The purpose of this Ordinance is to give project sponsors more flexibility in how they meet street tree planting requirements, reduce permitting delays, and allow Public Works to collect fees that support large-scale tree planting efforts.

Issues and Considerations

San Francisco's Urban Forest Plan

Adopted in 2015, San Francisco's Urban Forest Plan establishes a framework for improving the City's tree canopy from 105,000 street trees to 155,000 street trees by 2035. The City adopted this Plan to address the fact that San Francisco has among the smallest tree canopy of major US cities at 13.7%.[1] Additionally, one of the Department's key findings is that the inadequate maintenance funding and fragmented maintenance structure has compromised the health and safety of the City's street trees.

> One of the Department's key findings is that the inadequate maintenance funding and fragmented maintenance structure has compromised the health and safety of the City's street trees.

Emphasizing the value of centralized street tree maintenance and management, the Urban Forest Plan recommends that "[t]he current practice of transferring maintenance responsibility for street trees to private property owners should stop."[2] The proposed Ordinance would align with this overall goal by creating more funding for the Department of Public Works to pursue proactive street tree planting while also placing more trees under its direct responsibility.

> "The current practice of transferring maintenance responsibility for street trees to private property owners should stop." – *excerpt from the Urban Forest Plan*

Project Flexibility

To comply with current street tree planting requirements, a project sponsor must submit a proposed tree and tree well design, seek permit approval from the Bureau of Urban Forestry, construct the proposed tree well, plant the tree, and maintain the young tree through regular watering for at least three years (after which regular watering is typically not necessary). Certain projects subject to tree-planting requirements, such as additions of 500 square feet or more, might not propose alterations to the front façade, setback, or street-adjacent furnishing area. For these projects, requiring a street tree creates a new design and construction obligation that is otherwise unrelated to the project's scope. Allowing an in-lieu fee provides an option to project sponsors who wish to avoid the delay and burden associated with the process of planting a street tree, while still supporting the City's broader urban tree canopy goals.

> Allowing an in-lieu fee provides an option to project sponsors who wish to avoid the delay and burden associated with the process of planting a street tree, while still supporting the City's broader urban

[1] In 2014, the City's urban tree canopy (13.7%), measured by the amount of land covered by trees when viewed from above, was one of the smallest among major U.S. cities, less than Los Angeles (21%), Chicago (17%), and New York (24%). City and County of San Francisco, Planning Department, *Urban Forest Plan (Final)* (San Francisco: City and County of San Francisco, September 23, 2014), accessed March 2, 2026, https://sfplanning.s3.amazonaws.com/default/files/plans-and-programs/planning-for-the-city/urban-forest-plan/Urban_Forest_Plan_Final-092314WEB.pdf, 27.
[2] Ibid., 18.

> tree canopy goals.

Bureau of Urban Forestry Capacity

The Bureau of Urban Forestry (BUF) employs several arborists who staff street tree permitting while also performing a variety of other functions, such as inspections and field work. Because of staffing constraints, down from 6 arborists in 2023 to 3 currently, BUF review of street tree planting permits is a known source of delay for many projects awaiting building permit approvals. Applicants often discover their street tree planting requirements at the very end of the permitting process – leading to frustration and am average 32-day wait for BUF permit approval. Under this proposal, projects may elect to avoid this permitting timeframe by paying the in-lieu fee. Furthermore, reducing the permit review burden on BUF staff allows these arborists to prioritize tree inspection and maintenance work, in addition to planning for and managing contract work for proactive City-led tree planting.

> Because of staffing constraints, review of street tree planting permits is a known source of delay for many projects awaiting building permit approvals.

Other Legislative Changes - Appeals

This Ordinance also proposes two separate changes to the appeals for two types of tree removals, both of which are beyond the scope of the Commission's review. However, a very brief overview of these provisions is provided for context below:

- Public Works removals of hazard trees (i.e., trees that pose an imminent hazard to person or property) would no longer be appealable to the Board of Appeals.
- City-initiated removals of trees on City property would no longer be appealable to the Board of Appeals under the current legislative language. However, staff understands that this provision will be amended to maintain these appeals, subject to certain procedural limitations.

General Plan Compliance

The proposed Ordinance supports multiple General Plan policies by expanding large-scale, City-led tree planting and coordinated urban forest management, thereby enhancing district character, biodiversity, and long-term ecological health. By creating a predictable in-lieu fee option and allowing alternative landscaping, the Ordinance strengthens the City's ability to implement cohesive urban forestry improvements while reducing permitting burdens that can delay housing projects. These streamlining measures also improve inter-agency coordination and remove barriers for small-scale and ADU development, advancing policies that facilitate timely housing delivery and incremental housing production citywide.

Racial and Social Equity Analysis

The proposed Ordinance advances racial and social equity by dedicating in-lieu fees from developers—who benefit from reduced administrative burden—to a fund for proactive, City-led street tree planting and maintenance by the Department of Public Works. This strategy may help address the existing disparity in urban tree canopy, which often aligns with socio-economic and racial factors, by allowing Public Works to prioritize planting in low-canopy areas. The potential negative impact of fewer immediate on-site tree plantings is mitigated by the strategic use of the pooled funds to advance environmental equity at a wider scale, in alignment with the City's environmental justice goals. Furthermore, the Ordinance requires the City to track both fee collection sources and expenditures to ensure tree planting funds are being used appropriately and in accordance with the City's racial and social equity goals.

Implementation

The Department has determined that this Ordinance will impact our current implementation procedures in the following ways:

- Planning Department staff would be responsible for determining whether street tree planting requirements are triggered and would inform project applicants of their tree planting obligations or in-lieu fee obligations.
- If a project applicant elects to proceed with tree planting, Planning would refer the applicant to the Bureau of Urban Forestry for permitting under the existing system;
- If a project applicant elects to proceed with in-lieu fee payment, then the planner would include this fee amount in the Planning Approval Letter alongside other project fee obligations. Payment of these fees must be submitted prior to building permits issuance.

Recommendation

The Department recommends that the Commission *adopt a recommendation for approval* of the proposed Ordinance and adopt the attached Draft Resolution to that effect.

Basis for Recommendation

The Department finds that the proposed Ordinance allows for increased project flexibility and administrative efficiency while also advancing the City's proactive urban forestry goals. The creation of an in-lieu fee option provides project sponsors—especially those with small-scale residential projects—a predictable alternative to the existing street tree permitting process. This reduces the burden on individual property owners, offering project flexibility that can expedite development. Crucially, the pooled in-lieu fees will be dedicated to a separate account within the Adopt-A-Tree Fund, creating a sustainable funding stream. This resource enhances the Bureau of Urban Forestry's capacity to pursue proactive, city-led tree planting and essential maintenance at scale, which is necessary to achieve the Urban Forest Plan's goal of increasing the city's tree canopy. Furthermore, by directing funds towards Public Works' proactive efforts, the Ordinance advances

racial and social equity by allowing the City to pursue planting in low-canopy areas, addressing existing disparities.

Required Commission Action

The proposed Ordinance is before the Commission so that it may adopt a recommendation of approval, disapproval, or approval with modifications.

Environmental Review

The proposed amendments are not defined as a project under CEQA Guidelines Section 15060(c)(2) and 15378 because they do not result in a physical change in the environment.

Public Comment

The Clerk of the Board of Supervisors received approximately 125 public comment letters for this Ordinance. This includes several letters that were transmitted multiple times by the same individuals, and other form letters that were transmitted by many individuals, and a letter from the San Francisco Forest Alliance. The Department reviewed and included for this Commission's review approximately 16 unique letter texts that reflect the letters received. The comment letters also include an Action Network petition for "Protect San Francisco Trees!" with 583 signatories submitted by Joshua Klipp. Those letters are attached.

ATTACHMENTS:

Exhibit A:	Draft Planning Commission Resolution
Exhibit B:	Board of Supervisors File No. 251211
Exhibit C:	Letters of Opposition

Portions of this report were drafted and/or edited with the assistance of Microsoft Copilot, in accordance with the City and County of San Francisco's policy on the use of generative AI tools.

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Carla Short, Director | Director's Office
carla.short@sfdpw.org | T. 628.271.3078 | 49 South Van Ness Ave. Suite 1600, San Francisco, CA 94103

January 27, 2026

Angela Calvillo, Clerk
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, room 250
San Francisco, CA 94103

RE: Addition to Board file 251211 *Public Works, Administrative, Planning Codes - Street Trees*

To the Clerk of the Board of Supervisors:

Board File 251211 is a proposed ordinance introduced on December 9, 2025. The ordinance revises the Public Works, Administrative, and Planning codes. It is intended to improve the City's tree planting and maintenance operations and permit application processes for the public as well as our Bureau of Urban Forestry staff. Part of the revision makes it easier for the public to pay a street tree planting in-lieu fee instead of planting street trees on their own.

For the Board file, attached is a matrix showing the basis for calculating the fee for street tree in-lieu fees pursuant to Public Works Code Section 806. The matrix details the costs that support the fee. (The fee was established in fiscal year 2006-2007 and has grown by the Consumer Price Index since.) The matrix also details the annual inflation adjustments pursuant to Public Works Code Section 2.1.1.

If you have any questions, please contact Ian Schneider in my office at 628-271-3126 or Ian.Schneider@sfdpw.org.

Sincerely,

DocuSigned by:
073CF73A4EA6486...
Carla Short
Director

SAN FRANCISCO

DEPARTMENT OF PUBLIC WORKS

Final Report for:

User Fee Study

June 5, 2024

Prepared by:

NBS
helping communities fund tomorrow

nbsgov.com

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1. EXECUTIVE SUMMARY

NBS performed a User Fee Study (Study) for the San Francisco Department of Public Works (Public Works). The purpose of this report is to present the findings and recommendations of the various fee analyses performed and provide Public Works and the City/County Board of Supervisors with the information needed to update and establish user and regulatory fees for service. Throughout the process, the Study afforded much effort to ensure that not only are the fees and charges reasonable and equitable, but that they also meet industry standards and uphold the statutory requirements of the State of California.

California cities, counties, and special districts may impose user and regulatory fees for services and activities they provide through provisions set forth in the State Constitution, Article XIII C § 1. Under this legal framework, a fee may not exceed the reasonable cost of providing the service or performing the activity. For a fee to qualify as such, it must relate to a service or activity performed at the request of an individual or entity upon which the fee is imposed, or their actions specifically cause the local government agency to perform additional activities. In this instance, the service or underlying action causing the local agency to perform the service is either discretionary and/or is subject to regulation. As a discretionary service or regulatory activity, the user fees and regulatory fees considered in this Study fall outside of the definition and statutory requirement to impose general taxes, special taxes, and fees as a result of property ownership.

The main reason for conducting this Study was twofold: (1) first, to ensure that existing fees do not exceed the costs of providing the service, and (2) second, to provide an opportunity for the Board of Supervisors to re-align fee amounts with localized cost recovery policies.

1.1 Findings

This Study examined user and regulatory fees charged by the Public Works Bureau of Street-Use and Mapping, which includes fees for Permits, Inspection, and Subdivision and Mapping, as well as the Bureau of Urban Forestry. Additionally, the Study included one inspection fee within the Bureau of Street & Environmental Services' Community Preservation and Blight Reduction Act. The Study identified an estimated $16.9 million per year in eligible costs for recovery from fees, compared to approximately $9.5 million currently collected from fees. The following table provides a summary of the Study's results:

Table 1. Report Summary

Fee Category	Annual Estimated Revenues at Current Fee	Annual Estimated Revenues at Full Cost Recovery Fee	Annual Cost Recovery Surplus/ Deficit	Existing Cost Recovery Percentage
Bureau of Street-Use and Mapping				
Permits & Inspection divisions	3,885,875	8,827,262	(4,941,387)	44%
Subdivision and Mapping division	3,705,870	6,117,075	(2,411,205)	61%
Bureau of Urban Forestry	1,232,973	1,316,983	(84,010)	94%
Bureau of Street & Environmental Services - Community Preservation and Blight Reduction Act	690,880	699,093	(8,213)	99%
Total	**$ 9,515,598**	**$ 16,960,412**	**$ (7,444,814)**	**56%**

As shown in Table 1 on the previous page, Public Works is recovering approximately 56% of the costs associated with providing user and regulatory fee-related services. Should the Board adopt fees at 100% of the full cost recovery amounts determined by this Study, an additional $7.4 million in costs could be recovered.

However, Section 2.2.3 later explains, there may be other local policy considerations that support adopting fees at less than the calculated full cost recovery amount. Since this element of the Study is subjective, NBS provided the maximum potential of fee amounts at 100% full cost recovery for Public Works to consider. Once the Board of Supervisors has reviewed and evaluated the results of the Study, Public Works can set fees at appropriate cost recovery levels according to local policy goals and considerations.

1.2 Fee Study Sensitivity Analysis

As part of the scope of this project, NBS subcontracted with a San Francisco local business enterprise (LBE) consulting firm, Urban Analytics, to perform a review of the benefits of different types of fees for service activities through an analysis of potential market sensitivities to those fees and the interaction of those fees with established Public Woks goals and policies. A memorandum provided by Urban Analytics has been provided as an Appendix to this report which documents the results of the sensitivity analysis.

1.3 Report Format

This report documents the analytical methods and data sources used in the Study, presents findings regarding current levels of cost recovery achieved from user and regulatory fees, and provides a comparative survey of fees to neighboring agencies for similar services. The report is organized into the following sections:

- Section 2 - Outlines the general framework, approach, and methodology of the Fee Study.
- Sections 3 through 5 - Discusses the results of the cost of service analysis performed. The analysis includes: (1) fully burdened hourly rate(s); (2) calculation of the costs of providing service; and, (3) the cost recovery performance of each fee category.
- Section 6 - Presents the conclusions of the analysis provided in the preceding sections.
- Appendices to this report - Include additional details of the analysis performed, a comparison of the fees imposed by neighboring agencies for similar services and the Urban Analytics fee study sensitivity analysis.

2. INTRODUCTION AND FUNDAMENTALS

2.1 Scope of Study

The following is a summary of the fees evaluated during the Study:

- Bureau of Street-Use and Mapping
  - Permits & Inspection divisions
  - Subdivisions and Mapping division
- Bureau of Urban Forestry
- Bureau of Street & Environmental Services
  - Community Preservation and Blight Reduction Act

The fees examined in this report specifically exclude development impact fees, utility rates, and any special tax assessments which fall under a different set of statutory and procedural requirements from the body of user and regulatory fees analyzed in this Study. The Study also excludes facility and equipment rental rates, as well as most fines and penalties imposed by Public Works for violations of its requirements or codes.[1]

2.2 Methods of Analysis

Three phases of analysis were completed for Public Works:



2.2.1 COST OF SERVICE ANALYSIS

This cost of service analysis is a quantitative effort that compiles the full cost of providing governmental services and activities. There are two primary types of costs considered: direct and indirect costs. Direct costs are those that specifically relate to an activity or service, including the real-time provision of the service. Indirect costs are those that support the provision of services in general but cannot be directly or easily assigned to a singular activity or service.

Direct Costs:

- **Direct personnel costs –** Salary, wages and benefits expenses for personnel specifically involved in the provision of services and activities to the public.
- **Direct non-personnel costs –** Discrete expenses attributable to a specific service or activity performed, such as contractor costs, third-party charges, and materials used in the service or activity.

[1] According to the California Constitution Article XIII C § 1 (e) (4) and (5), the Public Works is not limited to the costs of service when charging for entrance to or use of government property, or when imposing fines and penalties.

Indirect Costs:

- **Indirect personnel costs –** Personnel expenses supporting the provision of services and activities. This can include line supervision and departmental management, administrative support within a department, and staff involved in technical support activities related to the direct services provided to the public.
- **Indirect non-personnel costs** – Expenses other than labor involved in the provision of services. In most cases, these costs are allocated across all services provided by a department, rather than directly assigned to individual fee/rate categories.
- **Overhead costs** – These are expenses, both labor and non-labor, related to department wide support services. The amount of overhead costs included in this Study were sourced from the Indirect Cost Plan prepared by Public Works. Countywide overhead costs as typically sourced from a Countywide Cost Allocation Plan were omitted from this analysis as directed by Public Works.

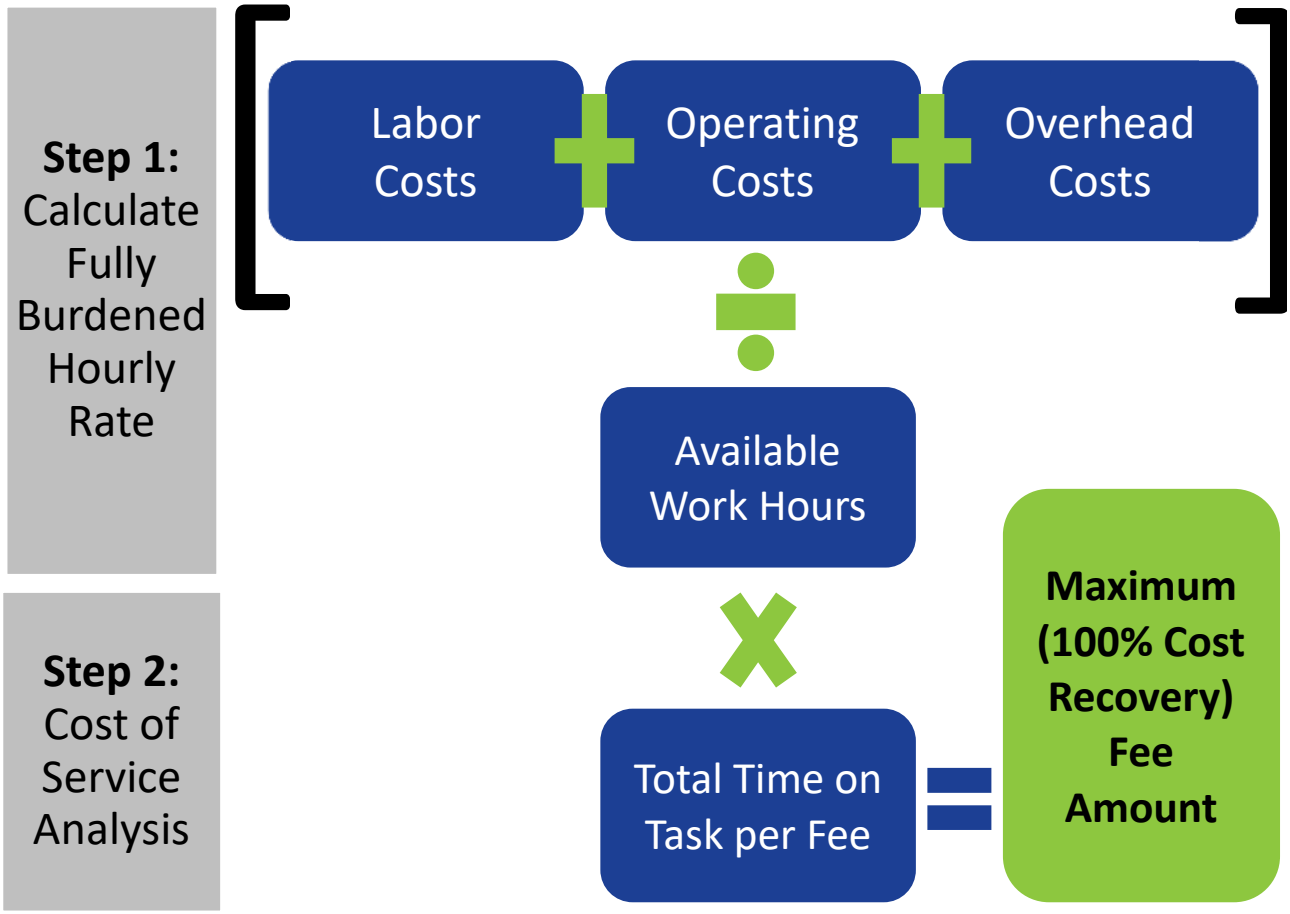
All cost components in this Study use annual (or annualized) figures, representing a twelve-month cycle of expenses incurred in the provision of all services and activities.

Nearly all the fees reviewed in this Study require specific actions on the part of Public Works staff to provide the service or conduct the activity. Since labor is the primary underlying factor in these activities, the Study expresses the full cost of service as a fully burdened cost per labor hour. NBS calculated a composite, fully burdened, hourly rate for each Bureau or division included in the Study. This rate serves as the basis for further quantifying the average full cost of providing individual services and activities. Determining the fully burdened labor rate requires two data sets: (1) the full costs of service, and (2) the number of staff hours available to perform those services. NBS derived the hours available based on the complete list of all employees.

The total number of paid labor hours for each employee was derived from the City & County of San Francisco's Memoranda of Understandings & Labor Agreements. These available hours represent the amount of productive time available to provide both fee-recoverable and non-fee recoverable services and activities. Available labor hours divided into the annual full costs of service equal the composite, fully burdened, labor rate. Some agencies may also use the resulting rates for purposes other than setting fees, such as calculating the full cost of general services or structuring a cost recovery agreement with another agency or third party.

NBS also assisted Public Works in estimating the staff time for the services and activities listed in the published fee schedule. Since Public Works does not systematically track the service time of activities at the individual fee-level, NBS relied on interviews and questionnaires to develop the necessary data sets of estimated labor time. In many cases, Public Works provided estimates of the average amount of time (in minutes and hours) it took to complete a typical service or activity considered on a per-occurrence basis.

It should be noted that the development of these time estimates was not a one-step process but required careful review by both NBS and managers to assess the reasonableness of such estimates. Based on the results of this review, Public Works reconsidered its time estimates until all parties were comfortable that the fee models reasonably reflected the average service level provided. Finally, the fully burdened labor rate(s) calculated in earlier steps were applied at the individual fee level time estimates, yielding an average total cost of providing each fee for service or activity. The graphic below provides a visual representation of the steps discussed in this section.



2.2.2 FEE ESTABLISHMENT

The fee establishment process includes a range of considerations, including the following:

- **Addition to and deletion of fees** – The Study provided the Department with the opportunity to propose additions and deletions to their current fee schedules, as well as re-name, re-organize, and clarify which fees were to be imposed. Many of these fee revisions allowed for better adherence to current practices, as well as the improvement in the calculation, application, and collection of the fees owed by an individual. Some additions to the fee schedule were simply the identification of existing services or activities performed by Public Works staff for which no fee is currently charged.

- **Revision to the structure of fees** – In most cases, the focus was to re-align the fee amount to match the costs of service and leave the current structure of fees unchanged. However, in several cases, fee categories and fee names had to be simplified or re-structured to increase the likelihood of full cost recovery or to enhance the fairness of how the fee is applied to the various types of fee payers.
- **Documentation of the tools used to calculate special cost recovery –**Public Works' fee schedule should include the list of fully burdened rates developed by the Study. Documenting these rates in the fee schedule provides an opportunity for the Board of Supervisors to approve rates for cost recovery under a "time and materials" approach. It also provides clear publication of those rates so that all fee payers can readily reference the basis of any fee amounts. The fee schedule should provide language that supports special forms of cost recovery for activities and services not included in the adopted master fee schedule. In these rare instances, published rates are used to estimate a flat fee or bill on an hourly basis, which is at the department director's discretion.

2.2.3 COST RECOVERY EVALUATION

The NBS fee model compares the existing fee for each service or activity to the average total cost of service quantified through this analysis. Here are the possible outcomes of the fee analysis:

- Cost recovery rate of 0% - This signifies that there is currently no current recovery of costs from fee revenues (or insufficient information available for evaluation).
- Cost recovery rate of 100% - This means that the fee currently recovers the full cost of service.
- Cost recovery rate between 0% and 100% - This indicates partial recovery of the full cost of service through fees.
- Cost recovery rate greater than 100% - This means that the fee exceeds the full cost of service. User fees and regulatory fees should not exceed the full cost of service.

In all cases, the cost recovery rate achieved by a fee should not be greater than 100%. In most cases, imposing a fee above this threshold could change the definition of the charge from a cost of service based fee to a tax which has other procedural requirements, such as ballot protest or voter approval.

NBS provided the framework for setting "recommended" or "target" level of cost recovery for each fee, established at either 100% or any amount less than the calculated full cost of service. Targets and recommendations reflect discretion on the part of the agency based on a variety of factors, such as existing Public Works policies and agency-wide or departmental revenue objectives, economic goals, community values, market conditions, level of demand, and others.

A general method of selecting an appropriate cost recovery target is to consider the public and private benefits of the service or activity in question, such as:

- To what degree does the public at large benefit from the service?
- To what degree does the individual or entity requesting, requiring, or causing the service benefit?

When a service or activity benefits the public at large, there is generally little to no recommended fee amount (i.e., 0% cost recovery), reinforcing the fact that a service which truly benefits the public is best funded by general resources of Public Works, such as revenues from the General Fund (e.g., taxes). Conversely, when a service or activity wholly benefits an individual or entity, the cost recovery is generally closer to or equal to 100% of cost recovery from fees collected from the individual or entity.

In some cases, a strict public-versus-private benefit judgment may not be sufficient to finalize a cost recovery target. Any of the following factors and considerations may influence or supplement the public-versus-private benefit perception of a service or activity:

- If optimizing revenue potential is an overriding goal, is it feasible to recover the full cost of service?
- Will increasing fees result in non-compliance or public safety problems?
- Are there desired behaviors or modifications to behaviors of the service population helped or hindered through the degree of pricing for the activities?
- Does current demand for services support a fee increase without adverse impact to the community served or current revenue levels? In other words, would fee increases have the unintended consequence of driving away the population served?
- Is there a good policy basis for differentiating between the type of user (e.g., residents vs. non-residents, residential vs. commercial, non-profit entities, and business entities)?
- Are there broader Public Works objectives that merit a less than full cost recovery target from fees, such as economic development goals and local social values?

NBS provided the cost of service calculation based on 100% full cost recovery and the framework for Public Works' use to adjust the amount of cost recovery in accordance with its broader goals as they pertain to code compliance, cost recovery, economic development, and social values.

2.2.4 COMPARATIVE FEE SURVEY

Appendix B presents the results of the Comparative Fee Survey for Public Works. Policy makers often request a comparison of their jurisdictional fees to those of surrounding or similar communities. The purpose of a comparison is to provide a sense of the local market pricing for services, and to use that information to gauge the impact of recommendations for fee adjustments.

In this effort, NBS worked with Public Works to choose five comparative agencies – cities of Berkeley, Los Angeles, Oakland, Sacramento and Seattle. It is important to keep the following in mind when interpreting the general approach to, and use of, comparative survey data:

- Comparative surveys do not provide information about cost recovery policies or procedures inherent in each comparison agency.
- A "market-based" decision to price services below the full cost of service calculation is the same as deciding to subsidize that service.
- Comparative agencies may or may not base their fee amounts on the estimated and reasonable cost of providing services. NBS did not perform the same level of analysis of the comparative agencies' fees.
- The results of comparative fee surveys are often non-conclusive for many fee categories. Comparison agencies typically use varied terminology for the provision of similar services.

NBS made every reasonable attempt to source each comparison agency's fee schedule from their respective websites and compile a comparison of fee categories and amounts for the most readily comparable fee items that match the Public Works' existing fee structure.

2.2.5 DATA SOURCES

The following data sources were used to support the cost of service analysis and fee establishment phases of this Study:

- Public Works' Adopted Budget for Fiscal Year 2023-2024 with a COLA adjustment to bring labor costs in line with FY 25.
- A complete list of all Public Works personnel, salary/wage rates, regular hours, paid benefits, and paid leave amounts provided by the Finance Department
- Prevailing fee schedules
- Annual workload data provided by each fee program evaluated in the Study

Public Works' adopted budget serves as an important source of information that affects the cost of service results. NBS did not audit or validate Public Works' financial documents and budget practices, nor was the cost information adjusted to reflect different levels of service or any specific, targeted performance benchmarks. This Study accepts Public Works' budget as a legislatively adopted directive describing the most appropriate and reasonable level of Public Works spending. NBS consultants accept the Board of Supervisors' deliberative process and Public Works' budget plan and further assert that through this legislative process, Public Works has yielded a reasonable and valid expenditure plan to use in setting cost-based fees.

3. BUREAU OF STREET-USE AND MAPPING (BSM)

The Bureau of Street-Use and Mapping (BSM) ensures that residents and visitors in San Francisco experience a safe, accessible, and aesthetically pleasing public right of way. The staff is organized into five divisions: Permits, Mapping, Inspection, Special Projects, and Administration. This Study focused on the Permits, Inspection and Mapping divisions of BSM.

- The Permits & Inspection divisions ensure that City sidewalks and streets are safe and accessible by permitting and inspecting the use of the public right-of-way, including the installation and inspection of sidewalks.
- The Subdivision and Mapping division processes and reviews all subdivision projects that occur in San Francisco, including all condominium conversions. Additionally, the division provides surveying services for all city agencies and maintains the official map of the City and County of San Francisco.

3.1 Cost of Service Analysis

NBS developed composite, fully burdened, hourly rates for the Bureau of Street-Use and Mapping as shown in table 2 below:

Table 2. Fully Burdened Hourly Rate

Cost Element	BSM Public Information/ Phone and Counter Duty	BSM Non-fee Related Services	BSM Permits & Inspection Direct Fees for Service	BSM Subdivision and Mapping Direct Fees for Service	Total
Labor	$ -	$ 2,139,966	$ 6,984,679	$ 2,518,503	$ 11,643,147
Recurring Non-Labor	-	5,658	18,466	6,659	30,783
CCSF Overhead	-	1,279,974	4,177,735	1,506,388	6,964,098
Allocated Common Activities	1,912,998	1,731,322	5,650,897	2,037,574	11,332,791
Department Total	**$ 1,912,998**	**$ 5,156,920**	**$ 16,831,778**	**$ 6,069,123**	**$ 29,970,818**
Fully Burdened Hourly Rate			**$ 229**	**$ 238**	
	Reference: Direct Hours Only		*73,537*	*25,529*	

As shown, the total cost of BSM is approximately $30 million per year. However, the results of the cost of service analysis identified $16.8 million in eligible costs for recovery from fee for service activities provided by the Permits & Inspection divisions, and $6.1 million in eligible costs for recovery from fee for service activities provided by the Subdivision and Mapping division. All subsequent cost of service calculations at the individual fee level for these divisions assume a fully burdened hourly rate of **$229** for the Permits & Inspection divisions, and **$238** for the Subdivision and Mapping division.

Based on interviews with staff, the analysis segregated the total cost of services into four primary services categories: (1) Public Information/Phone and Counter Duty; (2) Non-fee Related Services; (3) Permits & Inspection Direct Fees for Service; and, (4) Subdivision and Mapping Direct Fee for Service. In order to clarify the underlying costs and assumptions used to calculate the fully burdened hourly rate, here is a summary of the descriptions for each cost category:

- **BSM Public Information/Phone and Counter Duty –** Activities associated with responding to phone calls and general information requests that support the development review process. Typically, some portion of costs for the provision of general public information and assistance do not apply toward recovery from fees and are considered a basic function of governmental services to the public. The portion of costs indirectly attributable to fee for service activity has been included in Permitting & Inspection and Subdivision & Mapping Direct Fees for Service columns, while the remaining costs should not be considered in the calculation of fees for services.
- **BSM Non-fee Related Services –** Costs associated with Staff's time spent on non-fee related services. These activities have alternate funding sources, therefore should not be considered in the calculation of fees for services.
- **BSM Permits & Inspection Direct Fees for Service –** This category includes Staff time spent providing routine permitting and inspection fee for service activities, therefore, 100% of these costs are recoverable from fees for service.
- **BSM Subdivision and Mapping Direct Fees for Service –** This category includes Staff time spent providing routine subdivision and mapping fee for service activities, therefore, 100% of these costs are recoverable from fees for service.

The fully burdened hourly rate involves significant analytical and policy-related decisions regarding the inclusion of categorized activity costs. The decision to either include or exclude certain costs toward recovery in fees for service stems from the basic fee setting parameters set forth by industry standard fee calculation methods and the California State Constitution. State statutes require that any new fee that is levied or any existing fee that is increased should not exceed the estimated amount required to provide the service for which the charge is levied.

3.2 Fee Establishment

The following is a summary of the overall changes to the Permits & Inspection fee schedule:

- Deletion of fees that are no longer used or needed:
  - Debris Box
  - Sign Printing
  - News Racks
- Reorganization of fee categories or clarification of fee names to create a more user-friendly fee structure:
  - Banners – split fee into processing vs inspection.
  - Contractor Parking Plan – excavation fee split into separate administrative, inspection and modification fees.
  - Mobile Food Facilities – split new application with one (1) location into separate filing, notification and inspection fees. Added in "Each additional location" and "Modification of location, or hours of operations" fee categories for clarification on how the fees are intended to be charged.
- Addition of new fee categories, notated as "New" in the Current Fee column of Appendix A.1.
  - Major Encroachment – added at risk and City Attorney fee sub-categories.
  - Minor Sidewalk Encroachment – added a public hearing fee.

- Publishing Inspection fees for: nighttime work, overwide driveway, pipe barriers, security bollards, sidewalk repair, and special sidewalk.
- Street Improvement – split minimum submittal fee into a simple vs complex category.
- Street Space – added occupancy assessment fee
- Transient Shelters – added a fee for exiting location when no public notice is required

The following is a summary of the overall changes to the Subdivision and Mapping fee schedule:

- Deletion of fees that are no longer used or needed, such as flood letter request.
- Reorganization of fee categories or clarification of fee names to create a more user-friendly fee structure, such as displaying the additional fee for sidewalk legislation, and street vacation.
- No new fees were added at this time.

3.3 Cost Recovery Evaluation

Appendix A.1 and A.2 presents the results of the detailed cost recovery analysis of fees for the Bureau of Street-Use and Mapping. In the Appendix, the "Cost of Service per Activity" column establishes the maximum adoptable fee amount for the corresponding service identified in the "Fee Name" list.

Currently, approximately 51% of the total cost of providing BSM services is being recovered from fees. As Table 3 shows, approximately $7.6 million is collected per year in revenue at the current fee amounts. At full cost recovery and the same demand level for these services, approximately $14.9 million could be recovered.

Table 3. Cost Recovery Outcomes

Fee Category	Annual Estimated Revenues at Current Fee	Annual Estimated Revenues at Full Cost Recovery Fee	Annual Cost Recovery Surplus/ Deficit	Existing Cost Recovery Percentage
Bureau of Street-Use and Mapping				
Permits & Inspection divisions	3,885,875	8,827,262	(4,941,387)	44%
Subdivision and Mapping division	3,705,870	6,117,075	(2,411,205)	61%
Total	**$ 7,591,745**	**$ 14,944,337**	**$ (7,352,592)**	**51%**

NBS provided a full cost of service evaluation and the framework for considering fees, while it is up to Public Works and the Board to determine the appropriate cost recovery levels at or below full cost amounts.

In addition to the "Annual Estimated Revenues at Current Fee" amount shown above, the Permits & Inspection divisions also collect approximately $7.1 million in revenue from occupancy assessment/street space rentals. NBS did not evaluate these fees based on the stipulations of California Constitution Article XIII C § 1 (e) (4) which may consider these occupancy assessment fees as part of the "entrance to or use of government property" exemption from the definition of a charge as a tax, therefore they would not be limited to the cost of providing services.

4. BUREAU OF URBAN FORESTRY (BUF)

The Bureau of Urban Forestry (BUF) enhances the City's green infrastructure by preserving and growing the trees and plants that make up San Francisco's urban forest. The Bureau also repairs tree-related sidewalk damage and provides emergency tree response.

4.1 Cost of Service Analysis

NBS developed a composite, fully burdened, hourly rate for the Bureau of Urban Forestry as shown in table 4 below:

Table 4. Fully Burdened Hourly Rate

Cost Element	BUF Non-fee Related Services	BUF Direct Permitting & Inspection Fees for Service	Total
Labor	$ 448,145	$ 541,485	$ 989,629
Recurring Non-Labor	36,571	44,189	80,760
CCSF Overhead	196,119	236,966	433,085
Allocated Common Activities	227,544	274,936	502,480
Bureau Total	**$ 908,378**	**$ 1,097,576**	**$ 2,005,954**
Fully Burdened Hourly Rate	**n/a**	**$ 205**	
	Reference: Direct Hours Only	**5,358**	

As shown, the total cost of BUF is approximately $2 million per year. However, the results of the cost of service analysis identified $1 million in eligible costs for recovery from fee for service activities. All subsequent cost of service calculations at the individual fee level for these divisions assume a fully burdened hourly rate of **$205**.

Based on interviews with staff, the analysis segregated the total cost of services into two primary services categories: (1) Non-fee Related Services; and (2) Direct Permitting & Inspection Fees for Service. In order to clarify the underlying costs and assumptions used to calculate the fully burdened hourly rate, here is a summary of the descriptions for each cost category:

- **BUF Non-fee Related Services –** Costs associated with Staff's time spent on non-fee related services. These activities have alternate funding sources, therefore should not be considered in the calculation of fees for services.
- **BUF Direct Permitting & Inspection Fees for Service –** This category includes Staff time spent providing routine permitting and inspection fee for service activities, therefore, 100% of these costs are recoverable from fees for service.

The fully burdened hourly rate involves significant analytical and policy-related decisions regarding the inclusion of categorized activity costs. The decision to either include or exclude certain costs toward recovery in fees for service stems from the basic fee setting parameters set forth by industry standard fee

calculation methods and the California State Constitution. State statutes require that any new fee that is levied or any existing fee that is increased should not exceed the estimated amount required to provide the service for which the charge is levied.

4.2 Fee Establishment

The following is a summary of the overall changes to the Permitting & Inspection fee schedule:

- No fees were deleted at this time
- Reorganization of fee categories or clarification of fee names to create a more user-friendly fee structure:
    - Sidewalk Landscaping – recategorized the list of per application based on property count fees into a "non-construction related" category. To account for the difference in the level of service required for "construction related" activities, a new set of fee categories was added based on lineal feet of frontage.
    - In-lieu Tree Fee – to provide the fee payor with a better understanding of what is included, the fee was broken up into the time staff spends processing the request and then adding in the pass through cost of the tree itself and the cost of watering.
- Addition of new fee categories, notated as "New" in the Current Fee column of Appendix A.3.[2]
    - Construction related sidewalk landscaping
    - New planting (standalone, no tree removal permit)
    - Re-inspection fee / additional site visit

4.3 Cost Recovery Evaluation

Appendix A.3 presents the results of the detailed cost recovery analysis of fees for the Bureau of Urban Forestry. In the Appendix, the "Cost of Service per Activity" column establishes the maximum adoptable fee amount for the corresponding service identified in the "Fee Name" list.

Currently, approximately 94% of the total cost of providing services is being recovered from fees. As Table 5 shows, approximately $1.2 million is collected per year in revenue at the current fee amounts. At full cost recovery and the same demand level for these services, approximately $1.3 million could be recovered.

Table 5. Cost Recovery Outcomes

Fee Category	Annual Estimated Revenues at Current Fee	Annual Estimated Revenues at Full Cost Recovery Fee	Annual Cost Recovery Surplus/ Deficit	Existing Cost Recovery Percentage
Bureau of Urban Forestry	1,232,973	1,316,983	(84,010)	94%

NBS provided a full cost of service evaluation and the framework for considering fees, while it is up to Public Works and the Board to determine the appropriate cost recovery levels at or below full cost amounts.

[2] Refer to Section 2.2, *Methods of Analysis*, for additional discussion on the Study's approach to adding, deleting, and revising fee categories.

5. BUREAU OF STREET & ENVIRONMENTAL SERVICES (SES)

The Bureau of Street & Environmental Services' (SES) Community Preservation and Blight Reduction Act aims to reduce the number of blighted properties in San Francisco neighborhoods. A blighted property is one that is under significant deterioration or disrepair. It is a dilapidated building or an abandoned lot that is inadequately maintained and an eyesore in the neighborhood. The ordinance specifically focuses on conditions of blight visible from the street or sidewalk. These properties can attract illegal activities, cause general neighborhood instability, are a public nuisance, and can endanger the health and safety of its residents and neighbors. Enforcement of anti-blight provisions is vital to ensuring the quality of life in San Francisco and the City can take action to rehabilitate these properties.

5.1 Cost of Service Analysis

Upon notification of a blighted property, Public Works will send an inspector to assess the property to determine if enforcement of the Blight Ordinance is warranted. If violations are found, an action notice will be issued to abate the blighted property and an inspection fee will be assessed. If owners fail to correct the blighted issue, additional notice of violations will be assessed. Due to the punitive nature of most of the charges in the Blight Ordinance, the focus of this Study was the cost of service of the initial inspection fee only.

Based on interviews with the Public Works staff responsible for performing the inspection, the time it takes to complete the initial inspection is approximately 2.5 hours. To determine the total cost of providing this service, the average fully burdened cost per hour of an inspector performing these services was calculated using the base hourly rate of a SES Inspector, multiplied by the bureau and department overhead, as well as the fringe benefits and paid time off overhead rates calculated by Public Works staff in the FY 2022-23 indirect cost plan. For purposes of this analysis, all subsequent fees for service assume a fully burdened hourly rate of **$130.**

5.2 Cost Recovery Evaluation

Appendix A.4 presents the results of the cost recovery analysis of inspection fee assessed as part of the Bureau of Street & Environmental Services' Community Preservation and Blight Reduction Act. In the Appendix, the "Cost of Service per Activity" column establishes the maximum adoptable fee amount for the corresponding service identified in the "Fee Name" list.

Currently, approximately 99% of the total cost of providing services is being recovered from fees. As Table 6 shows, approximately $691,000 is collected per year in revenue at the current fee amounts. At full cost recovery and the same demand level for these services, approximately $700,000 could be recovered.

Table 6. Cost Recovery Outcomes

Fee Category	Annual Estimated Revenues at Current Fee	Annual Estimated Revenues at Full Cost Recovery Fee	Annual Cost Recovery Surplus/ Deficit	Existing Cost Recovery Percentage
Bureau of Street & Environmental Services - Community Preservation and Blight Reduction Act	690,880	699,093	(8,213)	99%

NBS provided a full cost of service evaluation and the framework for considering fees, while it is up to Public Works and the Board to determine the appropriate cost recovery levels at or below full cost amounts.

6. CONCLUSION

Based on the outcomes of the Cost of Service Analysis, Fee Establishment, and Cost Recovery Evaluation presented in this Study, the proposed Master Fee Schedule has been prepared by Public Works for implementation and included in the accompanying Staff Report.

As discussed throughout this report, the intent of the proposed fee schedule is to improve Public Works' recovery of costs incurred to provide individual services, as well as adjust fees where the fees charged exceed the average costs incurred. Predicting the amount to which any adopted fee increases will affect revenue is difficult to quantify. For the near-term, Public Works should not count on increased revenues to meet any specific expenditure plan. Experience with the revised fee amounts should be gained first before revenue projections are revised. However, unless there is some significant, long-term change in activity levels, proposed fee amendments should enhance cost recovery performance over time, providing the ability to stretch other resources further for the benefit of the public at-large.

The Master Fee Schedule should become a living document, but handled with care:

- A fundamental purpose of the fee schedule is to provide clarity and transparency to the public and to staff regarding fees imposed by Public Works. Once adopted by the Board of Supervisors, the fee schedule is the final word on the amount and method in which fees should be charged and supersedes all previous fee schedules. If it is discovered that the master document is missing certain fees, those fees will eventually need to be added to the master fee schedule and should not exist outside the consolidated, master framework.
- Public Works should consider adjusting these user fees and regulatory fees on an annual basis to keep pace with cost inflation. For all fees and charges, for example, an annual Consumer Price Index adjustment could be applied to the new fee schedule. Conducting a comprehensive user fee study is not an annual requirement, and only becomes worthwhile over time as shifts in organization, local practices, legislative values, or legal requirements result in significant change.

As a final note, it is worth mentioning the path that fees, in general, have taken in the State of California. In recent years, there has been more public demand for the precise and equitable accounting of the basis for governmental fees and a greater say in when and how they are charged. It is likely that in the future, user and regulatory fees will require an even greater level of analysis and supporting data to meet the public's growing expectations. An agency's ability to meet these new pressures will depend on the level of technology they invest in their current systems. Continuous improvement and refinement of time tracking abilities will greatly enhance Public Works' ability to set fees for service and identify unfunded activities in years to come.

Disclaimer: In preparing this report and the opinions and recommendations included herein, NBS has relied on a number of principal assumptions and considerations with regard to financial matters, conditions and events that may occur in the future. This information and assumptions, including the Public Works's budgets, time estimate data, and workload information from Public Works staff, were provided by sources we believe to be reliable; however, NBS has not independently verified such information and assumptions. While we believe NBS' use of such information and assumptions is reasonable for the purpose of this report, some assumptions will invariably not materialize as stated herein and may vary significantly due to unanticipated events and circumstances. Therefore, the actual results can be expected to vary from those projected to the extent that actual future conditions differ from those assumed by us or provided to us by others.

APPENDIX A.1

Cost of Service Analysis – Bureau of Street-Use and Mapping – Permits & Inspection Divisions

				Activity Service Cost Analysis			Cost Recovery Analysis		Annual Estimated Revenue Analysis		
Fee No.	Fee Name	Fee Unit of Charge	Notes	Estimated Average Labor Time Per Activity (hours)	Fully Burdened Hourly Rate	Cost of Service Per Activity	Current Fee 2023-24 PW Permit Fee Schedule	Existing Cost Recovery %	Estimated Volume of Activity	Annual Estimated Revenues	
										Current Fee	Full Cost Recovery Fee
I	**STREET-USE**		[4,5]								
1	**Additional Street Space**										
	New Application	each		9.00	$ 229	**$ 2,060**	$ 594	29%	5	$ 2,970	$ 10,300
	Renewal	each		4.00	$ 229	**$ 916**	$ 336	37%	63	$ 21,168	$ 57,680
	per SF/month - assessment (<80' bulk & height)	per SF/month					$ 6.50				
	per SF/month - assessment (over 80' bulk & height)	per SF/month					$ 17				
2	**Banners**		[2]								
	Processing	per 20 banners		2.30	$ 229	**$ 526**	$ 121	23%	652	$ 78,892	$ 343,242
	Inspection	per 20 banners		0.50	$ 229	**$ 114**	$ 208	182%	671	$ 139,568	$ 76,792
3	**Board of Appeals Surcharge**	each					$ 10				
4	**Café Tables & Chair (annual)**										
	New	each		13.00	$ 229	**$ 2,976**	$ 165	6%	186	$ 30,690	$ 553,454
	plus each additional SF	each SF		0.03	$ 229	**$ 7**	$ 9.25	135%	13,198	$ 122,082	$ 90,626
	Renewal	each		2.40	$ 229	**$ 549**	$ 82	15%	465	$ 38,130	$ 255,440
	plus each additional SF	each SF		0.01	$ 229	**$ 2**	$ 8.00	350%	54,267	$ 434,136	$ 124,211
	Requiring Departmental Action	each		6.90	$ 229	**$ 1,579**	$ 165	10%	-	$ -	$ -
	plus each additional SF	each SF		0.05	$ 229	**$ 11**	$ 10.50	92%	-	$ -	$ -

				Activity Service Cost Analysis			Cost Recovery Analysis		Annual Estimated Revenue Analysis		
Fee No.	Fee Name	Fee Unit of Charge	Notes	Estimated Average Labor Time Per Activity (hours)	Fully Burdened Hourly Rate	Cost of Service Per Activity	Current Fee 2023-24 PW Permit Fee Schedule	Existing Cost Recovery %	Estimated Volume of Activity	Annual Estimated Revenues	
										Current Fee	Full Cost Recovery Fee
5	**Commemorative Plaque**	each	[3]	19.60	$ 229	**$ 4,486**	$ 1,833	41%	1	$ 1,833	$ 4,486
6	**Contractor Parking Plan**										
	Street Space	each		4.00	$ 229	**$ 916**	$ 765	84%	1	$ 765	$ 916
	Excavation	each									
	Administrative Fee	each		1.25	$ 229	**$ 286**	$ 168	59%	70	$ 11,760	$ 20,028
	Inspection	each		1.00	$ 229	**$ 229**	$ 390	170%	71	$ 27,690	$ 16,251
	Modification	each		1.25	$ 229	**$ 286**	$ 69	24%	-	$ -	$ -
7	**Consultation / Pre-Application**										
	First 2 hours	flat		2.50	$ 229	**$ 572**	$ 533	93%	4	$ 2,132	$ 2,289
	each additional hour	hourly		1.00	$ 229	**$ 229**	$ 266	116%	-	$ -	$ -
8	**Display Merchandise**										
	Annual	each		4.95	$ 229	**$ 1,133**	$ 178	16%	286	$ 50,908	$ 324,038
	plus each additional SF	each SF		0.08	$ 229	**$ 18**	$ 11.75	64%	9,412	$ 110,591	$ 172,344

				Activity Service Cost Analysis			Cost Recovery Analysis		Annual Estimated Revenue Analysis		
Fee No.	Fee Name	Fee Unit of Charge	Notes	Estimated Average Labor Time Per Activity (hours)	Fully Burdened Hourly Rate	Cost of Service Per Activity	Current Fee 2023-24 PW Permit Fee Schedule	Existing Cost Recovery %	Estimated Volume of Activity	Annual Estimated Revenues	
										Current Fee	Full Cost Recovery Fee
9	**Excavation**										
	Administrative Fee										
	Small project - to 100 SF	per permit		1.80	$ 229	**$ 412**	$ 111	27%	1,382	$ 153,402	$ 569,385
	Medium project - 100 to 1,000 SF	per block		1.50	$ 229	**$ 343**	$ 140	41%	360	$ 50,400	$ 123,600
	Large project - 1,000+ SF	per block		2.50	$ 229	**$ 572**	$ 186	33%	227	$ 42,222	$ 129,895
	General Inspection Fee										
	Small project - to 100 SF	per permit		2.00	$ 229	**$ 458**	$ 600	131%	1,383	$ 829,800	$ 633,107
	Medium project - 100 to 1,000 SF	per day		0.14	$ 229	**$ 32**	$ 92	287%	359	$ 33,028	$ 11,504
	Large project - 1,000+ SF	per day		0.09	$ 229	**$ 21**	$ 136	660%	227	$ 30,872	$ 4,676
	Tank removal, standard side sewer, boring/monitoring wells)	per hour	[6]	1.00	$ 229	**$ 229**	$ 150	66%	364	$ 54,600	$ 83,316
	Utility Inspection Fee										
	Small project - to 100 SF	per permit		2.00	$ 229	**$ 458**	$ 26	6%	-	$ -	$ -
	Medium project - 100 to 1,000 SF	per day		0.14	$ 229	**$ 32**	$ 92	287%	-	$ -	$ -
	Large project - 1,000+ SF	per day		0.16	$ 229	**$ 37**	$ 136	371%	-	$ -	$ -
10	**Flower Markets**	each		5.50	$ 229	**$ 1,259**	$ 1,213	96%	4	$ 4,852	$ 5,036
11	**Free Sample Merchandise**	per day	[9]	1.55	$ 229	**$ 355**	$ 100	28%	52	$ 5,200	$ 18,448
12	**Inspection of Conformity**	each		3.00	$ 229	**$ 687**	$ 300	44%	216	$ 64,800	$ 148,320

				Activity Service Cost Analysis			Cost Recovery Analysis		Annual Estimated Revenue Analysis		
Fee No.	Fee Name	Fee Unit of Charge	Notes	Estimated Average Labor Time Per Activity (hours)	Fully Burdened Hourly Rate	Cost of Service Per Activity	Current Fee 2023-24 PW Permit Fee Schedule	Existing Cost Recovery %	Estimated Volume of Activity	Annual Estimated Revenues	
										Current Fee	Full Cost Recovery Fee
13	**Major Encroachment**		[3]								
	New Application	each		43.00	$ 229	**$ 9,842**	$ 5,748	58%	10	$ 57,480	$ 98,422
	At Risk	each		4.00	$ 229	**$ 916**	NEW	%		$ -	$ -
	City Attorney	actual cost					NEW				
	Annual Assessment Fee (min $100)	per SF/year					$ 5.25				
14	**Minor Sidewalk Encroachment**		[3]								
	New Application	each		22.00	$ 229	**$ 5,036**	$ 1,481	29%	629	$ 931,549	$ 3,167,368
	Public Hearing Required (additional fee)	each		6.00	$ 229	**$ 1,373**	NEW	%		$ -	$ -
	Annual Assessment Fee (min $100)	per SF/year					$ 5.25				
	Existing Conditions or Submittal with SI Permit (except shoring MSE permits)	each		2.00	$ 229	**$ 458**	$ 211	46%	-	$ -	$ -
15	**Mobile Food Facilities**		[6,7]								
	One (1) Location	each								$ -	$ -
	Filing Fee	each		6.00	$ 229	**$ 1,373**	$ 228	17%	135	$ 30,780	$ 185,400
	Notification Fee	each		2.00	$ 229	**$ 458**	$ 277	61%	38	$ 10,526	$ 17,396
	Inspection Fee	each		1.00	$ 229	**$ 229**	$ 528	231%	13	$ 6,864	$ 2,976
	Each additional location										
	Notification Fee	each		2.00	$ 229	**$ 458**	$ 277	61%	40	$ 11,080	$ 18,311
	Inspection Fee - first additional location	each		1.00	$ 229	**$ 229**	$ 264	115%	44	$ 11,616	$ 10,071
	Inspection Fee - each additional location	each		1.00	$ 229	**$ 229**	$ 264	115%	-	$ -	$ -
	Modification of location, or hours of operation										
	Filing Fee	each		4.00	$ 229	**$ 916**	$ 117	13%	-	$ -	$ -
	Notification Fee	each		2.00	$ 229	**$ 458**	$ 277	61%	-	$ -	$ -
	Inspection Fee	each		1.00	$ 229	**$ 229**	$ 264	115%	-	$ -	$ -
	Renewal (no violations within previous year)	each		1.00	$ 229	**$ 229**	$ 183	80%	-	$ -	$ -
	Per Decal (if applicable)	each		0.50	$ 229	**$ 114**	$ 50	44%	82	$ 4,100	$ 9,384

				Activity Service Cost Analysis			Cost Recovery Analysis		Annual Estimated Revenue Analysis		
Fee No.	Fee Name	Fee Unit of Charge	Notes	Estimated Average Labor Time Per Activity (hours)	Fully Burdened Hourly Rate	Cost of Service Per Activity	Current Fee 2023-24 PW Permit Fee Schedule	Existing Cost Recovery %	Estimated Volume of Activity	Annual Estimated Revenues	
										Current Fee	Full Cost Recovery Fee
16	**Nighttime Work (new application)**										
	Permit	each		4.70	$ 229	**$ 1,076**	$ 151	14%	687	$ 103,737	$ 739,060
	Inspection	per night		4.00	$ 229	**$ 916**	NEW	%	-	$ -	$ -
17	**Overwide Driveway (30+ feet)**		[3]								
	New Application	each		6.25	$ 229	**$ 1,431**	$ 1,158	81%	-	$ -	$ -
	Existing Condition	each		2.00	$ 229	**$ 458**	$ 211	46%	14	$ 2,954	$ 6,409
	Annual Assessment Fee	per SF/year					$ 5.25				
	Inspection	each		2.00	$ 229	**$ 458**	$ 371	81%	-	$ -	$ -
18	**Shared Spaces/Parklet**		[11]								
	Tier 1: Public Parklet										
	First parking space	each		13.00	$ 229	**$ 2,976**	$ 1,090	37%	-	$ -	$ -
	Each additional parking space	each		3.00	$ 229	**$ 687**	$ 272	40%	-	$ -	$ -
	Annual license per parking space	each		1.00	$ 229	**$ 229**	$ 109	48%	-	$ -	$ -
	Tier 2: Movable Commercial Parklet										
	First parking space	each		13.00	$ 229	**$ 2,976**	$ 2,180	73%	-	$ -	$ -
	Each additional parking space	each		3.00	$ 229	**$ 687**	$ 1,090	159%	-	$ -	$ -
	Annual license per parking space	each		1.00	$ 229	**$ 229**	$ 1,635	714%	-	$ -	$ -
	Tier 3: Fixed Commercial Parklet										
	First parking space	each		15.00	$ 229	**$ 3,433**	$ 3,270	95%	-	$ -	$ -
	Each additional parking space	each		3.00	$ 229	**$ 687**	$ 1,635	238%	-	$ -	$ -
	Annual license per parking space	each		1.00	$ 229	**$ 229**	$ 2,180	952%	-	$ -	$ -
19	**Pipe Barriers**		[3]								
	New Application	each		4.25	$ 229	**$ 973**	$ 1,040	107%	30	$ 31,192	$ 29,183
	Inspection Fee	per 25 ft		2.00	$ 229	**$ 458**	$ 489	107%	-	$ -	$ -
	Existing Conditions	each		2.00	$ 229	**$ 458**	$ 211	46%	6	$ 1,266	$ 2,747

				Activity Service Cost Analysis			Cost Recovery Analysis		Annual Estimated Revenue Analysis		
Fee No.	Fee Name	Fee Unit of Charge	Notes	Estimated Average Labor Time Per Activity (hours)	Fully Burdened Hourly Rate	Cost of Service Per Activity	Current Fee 2023-24 PW Permit Fee Schedule	Existing Cost Recovery %	Estimated Volume of Activity	Annual Estimated Revenues	
										Current Fee	Full Cost Recovery Fee
20	**Security Bollards (new application)**		[3]							$ -	$ -
	Application Fee	each		8.00	$ 229	**$ 1,831**	$ 3,067	167%	-	$ -	$ -
	Inspection Fee	per 25 ft		4.00	$ 229	**$ 916**	NEW	%	-	$ -	$ -
21	**Sidewalk Repair**	per 100 SF		1.00	$ 229	**$ 229**	$ 25	11%	617	$ 15,425	$ 141,225
	Inspection Fee	each		3.00	$ 229	**$ 687**	NEW	%	-	$ -	$ -
22	**Special Sidewalk**		[3]								
	New Application	each		4.00	$ 229	**$ 916**	$ 594	65%	34	$ 20,196	$ 31,129
	Non-Std Cross Slopes, Existing Conditions/Submittal with SI Permit	each		2.00	$ 229	**$ 458**	$ 211	46%	-	$ -	$ -
	Inspection Fee (Special Coating)	each		6.00	$ 229	**$ 1,373**	NEW	%	-	$ -	$ -
23	**Storage Container (registered companies only)**										
	Annual	each		2.10	$ 229	**$ 481**	$ 841	175%	-	$ -	$ -
	Deposit	each	[10]				$30,000 refundable bond				
	Individual Location										
	1st Day	each		1.00	$ 229	**$ 229**	$ 84	37%	14	$ 1,176	$ 3,204
	2nd & 3rd Day	each		1.00	$ 229	**$ 229**	$ 169	74%	-	$ -	$ -
	Over 3 days	each		1.00	$ 229	**$ 229**	$ 169	74%	-	$ -	$ -
	plus per container / day	per container / day		0.50	$ 229	**$ 114**	$ 84	73%	-	$ -	$ -

				Activity Service Cost Analysis			Cost Recovery Analysis		Annual Estimated Revenue Analysis		
Fee No.	Fee Name	Fee Unit of Charge	Notes	Estimated Average Labor Time Per Activity (hours)	Fully Burdened Hourly Rate	Cost of Service Per Activity	Current Fee 2023-24 PW Permit Fee Schedule	Existing Cost Recovery %	Estimated Volume of Activity	Annual Estimated Revenues	
										Current Fee	Full Cost Recovery Fee
24	**Street Improvement**										
	Minimum Submittal Fee (w/Building Permit App) - Simple	each		11.00	$ 229	**$ 2,518**	$ 1,660	66%	122	$ 202,520	$ 307,169
	Minimum Submittal Fee (w/Building Permit App) - Complex	each		39.00	$ 229	**$ 8,927**	NEW	%	-	$ -	$ -
	Minimum Notice to Repair	each		5.00	$ 229	**$ 1,144**	$ 554	48%	-	$ -	$ -
	Curb Cut Only Annual Assessment Fee (min $100)	per SF/year					$ 5.25				
25	**Street Space**										
	Permit	each		2.00	$ 229	**$ 458**	$ 168	37%	34	$ 5,712	$ 15,564
	Occupancy Assessment	per month/per 20 LF					NEW				
26	**Street Vending**										
	Application	each		6.00	$ 229	**$ 1,373**	$ 454	33%	-	$ -	$ -
	Renewal	each		1.00	$ 229	**$ 229**	$ 106	46%	-	$ -	$ -
27	**Temporary Occupancy**	per day / per block face		1.55	$ 229	**$ 355**	$ 84	24%	92	$ 7,728	$ 32,640
28	**Transit Shelters (registered companies only)**										
	New Location	each		12.30	$ 229	**$ 2,815**	$ 470	17%	26	$ 12,220	$ 73,199
	Existing location (if no public notice required)	each		3.00	$ 229	**$ 687**	NEW	%	-	$ -	$ -
29	**Vault (Transformer) Encroachment**		[3]								
	New Application	each		14.00	$ 229	**$ 3,204**	$ 1,536	48%	49	$ 75,264	$ 157,018
	Annual Assessment Fee	per SF/year					$ 19.75				

				Activity Service Cost Analysis			Cost Recovery Analysis		Annual Estimated Revenue Analysis		
Fee No.	Fee Name	Fee Unit of Charge	Notes	Estimated Average Labor Time Per Activity (hours)	Fully Burdened Hourly Rate	Cost of Service Per Activity	Current Fee 2023-24 PW Permit Fee Schedule	Existing Cost Recovery %	Estimated Volume of Activity	Annual Estimated Revenues	
										Current Fee	Full Cost Recovery Fee
30	**SFMTA Parking Meter Occupancy Fees**	per 25 LF / day					$ 18				
31	For services requested of City staff which have no fee listed in this fee schedule. Additionally, the City will pass-through to the applicant any discrete costs incurred from the use of external service providers if required to process the specific application.	hourly		1.00	$ 229	**$ 229**	$ -	%	-	$ -	$ -
TOTAL										3,885,875	8,827,262

NOTES

[1] Sourced from: 2022-23 Public Works Permit Fee Schedule, effective 7-1-22.

[2] Prorate if less than 20 banners.

[3] Permit may require notarization and recordation. Fees for such requirements are not included.

[4] All permits are subject to Board of Appeal Surcharge ($9) except for Commemorative Plaque, Flower Markets, Inspection of Conformity and Major Encroachments.

[5] Additional fees may apply for any additional time and materials, for processing permits as set forth In the Public Works Code, Section 2.1.3. Any expired or inactivated permits shall be subject to an additional renewal fee. Additional permits and fees may be required by other agencies.

[6] Boring, Monitoring Well, Side Sewer, Tank Removal, General Excavation and Mobile Food Facilities fees vary due to duration and size of the project. Please contact the main office for a plan checker at (415) 554-5810 for assistance.

[7] May require referral to Department of Public Health. The Department of Public Health may charge up to $191 per hour for referrals sent by Public Works.

[8] Separate fees shall be paid to the Department of Health and the Fire Marshal for the annual approvals required by each department for a valid permit. Fees for Department of Public Health are set forth in the Business and Taxation Code.

[9] $500 refundable bond applies

[10] $30,000 refundable bond applies

[11] Published fees are split between SFMTA and SFDPW

APPENDIX A.2

Cost of Service Analysis – Bureau of Street-Use and Mapping – Subdivision and Mapping Division

				Activity Service Cost Analysis			Cost Recovery Analysis		Annual Estimated Revenue Analysis		
Fee No.	Fee Name	Fee Unit of Charge	Notes	Estimated Average Labor Time Per Activity (hours)	Fully Burdened Hourly Rate	Cost of Service Per Activity	Current Fee 2023-24 Subdivision & Mapping Fee Schedule	Existing Cost Recovery %	Estimated Volume of Activity	Annual Estimated Revenues	
										Current Fee	Full Cost Recovery Fee
II	**SUBDIVISION AND MAPPING**										
1	**Application Processing**	each		6.00	$ 238	**$ 1,426**	$ 1,000	70%	-	$ -	$ -
2	**Parcel Map**		[3]								
	Condominium Conversions of 4 Units or Less	each		57.00	$ 238	**$ 13,551**	$ 12,429	92%	147	$ 1,827,063	$ 1,991,993
	New Construction Condominiums & Subdivisions of 4 Units or Less	each		57.00	$ 238	**$ 13,551**	$ 11,518	85%	58	$ 668,044	$ 785,956
	plus per lot	per lot		0.25	$ 238	**$ 59**	$ 50	84%	-	$ -	$ -
3	**Final Map**		[3]								
	Condominium Conversions of 5 or 6 Units	each		94.00	$ 238	**$ 22,347**	$ 12,592	56%	-	$ -	$ -
	plus per lot	per lot		0.25	$ 238	**$ 59**	$ 50	84%	-	$ -	$ -
	plus per lot (air space subdivision)	per lot		2.00	$ 238	**$ 475**	$ 806	170%	-	$ -	$ -
	New Construction Condominiums & Subdivisions of 5 Units or More	each		94.00	$ 238	**$ 22,347**	$ 12,592	56%	6	$ 75,552	$ 134,083
	plus per lot	per lot		0.25	$ 238	**$ 59**	$ 50	84%	-	$ -	$ -
	plus per lot (air space subdivision)	per lot		2.00	$ 238	**$ 475**	$ 806	170%	-	$ -	$ -

				Activity Service Cost Analysis			Cost Recovery Analysis		Annual Estimated Revenue Analysis		
Fee No.	Fee Name	Fee Unit of Charge	Notes	Estimated Average Labor Time Per Activity (hours)	Fully Burdened Hourly Rate	Cost of Service Per Activity	Current Fee 2023-24 Subdivision & Mapping Fee Schedule	Existing Cost Recovery %	Estimated Volume of Activity	Annual Estimated Revenues	
										Current Fee	Full Cost Recovery Fee
4	**Vertical Subdivision Map**		[3,4]								
	Parcel Map (4 Lots or Less)	each		59.00	$ 238	**$ 14,026**	$ 12,852	92%	14	$ 179,928	$ 196,370
	Final Map (5 Lots or More)	each		96.00	$ 238	**$ 22,823**	$ 12,852	56%	-	$ -	$ -
	Each Additional Lot (air space subdivision)	each		2.00	$ 238	**$ 475**	$ 806	170%	-	$ -	$ -
5	**Vesting Tentative Map**	each	[3,4]	98.00	$ 238	**$ 23,298**	$ 13,592	58%	3	$ 40,776	$ 69,894
6	**Amended Map**	each		35.00	$ 238	**$ 8,321**	$ 4,357	52%	-	$ -	$ -
7	**Lot Line Adjustment**	each		57.00	$ 238	**$ 13,551**	$ 4,357	32%	17	$ 74,069	$ 230,367
8	**Certificate of Compliance**	each		35.00	$ 238	**$ 8,321**	$ 3,446	41%	12	$ 41,352	$ 99,849
9	**Certificate of Correction**	each		35.00	$ 238	**$ 8,321**	$ 3,446	41%	-	$ -	$ -
10	**Sidewalk Legislation, Street Vacation**	per block		43.00	$ 238	**$ 10,223**	$ 3,293	32%	106	$ 349,058	$ 1,083,602
	Additional Fee (fronting/re-circulation)	per lot		8.00	$ 238	**$ 1,902**	$ 1,750	92%	4	$ 7,000	$ 7,608

				Activity Service Cost Analysis			Cost Recovery Analysis		Annual Estimated Revenue Analysis		
Fee No.	Fee Name	Fee Unit of Charge	Notes	Estimated Average Labor Time Per Activity (hours)	Fully Burdened Hourly Rate	Cost of Service Per Activity	Current Fee 2023-24 Subdivision & Mapping Fee Schedule	Existing Cost Recovery %	Estimated Volume of Activity	Annual Estimated Revenues	
										Current Fee	Full Cost Recovery Fee
11	**Record of Survey**	each		58.00	$ 238	**$ 13,789**	$ 816	6%	81	$ 66,096	$ 1,116,885
12	**Corner Record**	each	[2]	3.00	$ 238	**$ 713**	$ 25	4%	48	$ 1,200	$ 34,234
13	**Department of Building Inspection (DBI) Review Fee**	each	[6]				$ 538				
14	**Pre-application Meeting or Staff Consultation (first 2 hours)**	flat		2.50	$ 238	**$ 594**	$ 533	90%	-	$ -	$ -
	each additional hour	hourly		1.00	$ 238	**$ 238**	$ 266	112%	-	$ -	$ -
15	**Project Reinstatement (Untermination)**	each		4.00	$ 238	**$ 951**	$ 1,000	105%	8	$ 8,000	$ 7,608
16	**Incomplete Submittal**	each		2.50	$ 238	**$ 594**	$ 500	84%	17	$ 8,500	$ 10,104
17	**Appeal of Tentative Map Decision Fee**	each	[5]	4.00	$ 238	**$ 951**	$ 381	40%	2	$ 762	$ 1,902
18	**Monument Reference**	each		18.00	$ 238	**$ 4,279**	$ 4,070	95%	81	$ 329,670	$ 346,620
19	For services requested of City staff which have no fee listed in this fee schedule. Additionally, the City will pass-through to the applicant any discrete costs incurred from the use of external service providers if required to process the specific application.	hourly		1.00	$ 238	**$ 238**	$ -	%	-	$ -	$ -
TOTAL										3,705,870	6,117,075

				Activity Service Cost Analysis			Cost Recovery Analysis		Annual Estimated Revenue Analysis		
Fee No.	Fee Name	Fee Unit of Charge	Notes	Estimated Average Labor Time Per Activity (hours)	Fully Burdened Hourly Rate	Cost of Service Per Activity	Current Fee 2023-24 Subdivision & Mapping Fee Schedule	Existing Cost Recovery %	Estimated Volume of Activity	Annual Estimated Revenues	
										Current Fee	Full Cost Recovery Fee

NOTES

[1] Sourced from: 2022-23 Public Works Subdivision and Mapping Fee Schedule, effective 7-1-22.

[2] Maximum fee amount is set by State.

[3] Submit two (2) separate checks, payable to San Francisco Public Works or SFPW. One check is a non-refundable application processing fee of $1,000; and the second check is for the remaining map review fee. Please date checks no more than 15 days from the day of application submittal.

[4] Minimum fee. Additional fees may be assessed on time and material basis.

[5] Legislated fee

[6] Passthrough fee for DBI review

APPENDIX A.3

Cost of Service Analysis – Bureau of Urban Forestry

				Activity Service Cost Analysis			Cost Recovery Analysis		Annual Estimated Revenue Analysis		
Fee No.	Fee Name	Fee Unit of Charge	Notes	Estimated Average Labor Time Per Activity (hours)	Fully Burdened Hourly Rate	Cost of Service Per Activity	Current Fee 2023-24 PW Permit Fee Schedule	Existing Cost Recovery %	Estimated Volume of Activity	Annual Estimated Revenues	
										Current Fee	Full Cost Recovery Fee
III	**URBAN FORESTRY**										
1	**Sidewalk Landscaping**										
	Non-Construction Related										
	One (1) Property	per app		2.50	$ 205	**$ 512**	$ 340	66%	123	$ 41,820	$ 62,995
	2-4 Properties	per app		3.50	$ 205	**$ 717**	$ 292	41%	4	$ 1,168	$ 2,868
	5+ Properties	per app		4.50	$ 205	**$ 922**	$ 253	27%	97	$ 24,541	$ 89,423
	Construction Related										
	Single Property / Small Parcel / Residential - Retroactive (no changes required)	per app		2.00	$ 205	**$ 410**	NEW	%	-	$ -	$ -
	Up to 25 lf of frontage	flat		2.50	$ 205	**$ 512**	NEW	%	-	$ -	$ -
	26-75 lf of frontage	flat		3.00	$ 205	**$ 615**	NEW	%	-	$ -	$ -
	76-200 lf of frontage	flat		3.25	$ 205	**$ 666**	NEW	%	-	$ -	$ -
	201+ lf of frontage	flat		3.50	$ 205	**$ 717**	NEW	%	-	$ -	$ -
2	**In-Lieu Tree Fee**										
	DPW Labor	per tree		1.50	$ 205	**$ 307**					
	36 inch box tree	actual cost	[1]			**$ 538**					
	Water -3 years, 1350 gallons per week	actual cost	[1]			**$ 1,600**					
	Subtotal					**$ 2,446**	$ 2,431	99%	360	$ 875,160	$ 880,419
	DPW Labor	per tree		1.50	$ 205	**$ 307**					
	48 inch box tree	actual cost	[1]			**$ 1,658**					
	Water -3 years, 1350 gallons per week	actual cost	[1]			**$ 1,600**					
	Subtotal					**$ 3,566**	$ 2,431	68%	-	$ -	$ -
	DPW Labor	per tree		1.50	$ 205	**$ 307**					
	60 inch box tree	actual cost	[1]			**$ 3,317**					
	Water -3 years, 1350 gallons per week	actual cost	[1]			**$ 1,600**					
	Subtotal					**$ 5,224**	$ 2,431	47%	-	$ -	$ -

				Activity Service Cost Analysis			Cost Recovery Analysis		Annual Estimated Revenue Analysis		
Fee No.	Fee Name	Fee Unit of Charge	Notes	Estimated Average Labor Time Per Activity (hours)	Fully Burdened Hourly Rate	Cost of Service Per Activity	Current Fee 2023-24 PW Permit Fee Schedule	Existing Cost Recovery %	Estimated Volume of Activity	Annual Estimated Revenues	
										Current Fee	Full Cost Recovery Fee
3	**Tree Removal Permit Application (includes New Planting)**										
	Non-Construction Related										
	1 - 3 Trees	flat		3.00	$ 205	**$ 615**	$ 458	75%	31	$ 14,198	$ 19,052
	4-9 Trees	flat		4.00	$ 205	**$ 819**	$ 1,228	150%	19	$ 23,332	$ 15,570
	10+ Trees	flat		5.00	$ 205	**$ 1,024**	$ 1,845	180%	10	$ 18,450	$ 10,243
	Construction Related										
	1 - 3 Trees	flat		4.00	$ 205	**$ 819**	$ 923	113%	237	$ 218,751	$ 194,210
	4-9 Trees	flat		5.00	$ 205	**$ 1,024**	$ 1,228	120%	-	$ -	$ -
	10+ Trees	flat		6.00	$ 205	**$ 1,229**	$ 1,845	150%	-	$ -	$ -
4	**Tree Protection Plan**										
	1-3 Trees	per app		2.00	$ 205	**$ 410**	$ 151	37%	103	$ 15,553	$ 42,202
	4+ Trees	per app		3.00	$ 205	**$ 615**	$ 151	25%		$ -	$ -
5	**New Planting (standalone, no tree removal permit)**										
	Non-Construction Related	each		1.50	$ 205	**$ 307**	NEW	%	-	$ -	$ -
	Construction Related										
	Up to 50 lf of frontage	each		2.50	$ 205	**$ 512**	NEW	%	-	$ -	$ -
	51-125 lf of frontage	each		3.50	$ 205	**$ 717**	NEW	%	-	$ -	$ -
	126-250 lf of frontage	each		5.00	$ 205	**$ 1,024**	NEW	%	-	$ -	$ -
	251+ lf of frontage	each		6.50	$ 205	**$ 1,332**	NEW	%	-	$ -	$ -
6	**Reinspection Fee / Additional Site Visit**	per inspection		2.00	$ 205	**$ 410**	NEW	%	-	$ -	$ -
7	**Billboard Permit**	each	[2]				$ 300				
8	For services requested of City staff which have no fee listed in this fee schedule. Additionally, the City will pass-through to the applicant any discrete costs incurred from the use of external service providers if required to process the specific application.	hourly		1.00	$ 205	**$ 205**	$ -	%	-	$ -	$ -
TOTAL										1,232,973	1,316,983

NOTES

[1] Actual costs are passed through to applicant. NBS did not evaluate.

[2] Fee set by San Francisco Public Works code 805.1. NBS did not evaluate.

APPENDIX A.4

Cost of Service Analysis –

Bureau of Street & Environmental Services – Community Preservation and Blight Reduction Act

				Activity Service Cost Analysis			Cost Recovery Analysis		Annual Estimated Revenue Analysis		
Fee No.	Fee Name	Fee Unit of Charge	Notes	Estimated Average Labor Time Per Activity (hours)	Fully Burdened Hourly Rate	Cost of Service Per Activity	Current Fee	Existing Cost Recovery %	Estimated Volume of Activity	Annual Estimated Revenues	
										Current Fee	Full Cost Recovery Fee
IV	**BLIGHT**										
1	**Blight Violations**		[1]								
	Inspection Fee	per inspection		2.50	$ 130	**$ 324**	$ 320	99%	2,159	$ 690,880	$ 699,093
	Failure to Correct Notice of Violation										
	15 days - 90 days following notice	per day					$ 100				
	91 days - 120 days following notice	per day					$100 - $500				
	121 days or more following notice	per day					$500 - $1,000				
2	For services requested of City staff which have no fee listed in this fee schedule. Additionally, the City will pass-through to the applicant any discrete costs incurred from the use of external service providers if required to process the specific application.	hourly		1.00	$ 130	**$ 130**	NEW	%	-	$ -	$ -
TOTAL										690,880	699,093

NOTES

[1] Includes: Overgrown weeds and grass, Landscaping, Trash, litter and debris, Outside storage of household items, Property blight, Disrepair and exterior property conditions, Graffiti, Abandoned or junk vehicles, Vehicles parked on lawn or unpaved area, Home auto repair

APPENDIX B.1

Comparative Fee Survey – Bureau of Street-Use and Mapping – Permits & Inspection Divisions

City of San Francisco				Comparison Agencies				
Fee No.	Fee Description	Fee Unit / Type	Current Fee / Deposit	Berkeley	LA	Oakland	Sacramento	Seattle
I	**STREET-USE**							
1	**Additional Street Space**							
	New Application	each	$ 594	see street space	see street space	see street space	see street space	see street space
	Renewal	each	$ 336					
	per SF/month - assessment (<80' bulk & height)	per SF/month	$ 6.50	see street space	see street space	see street space	see street space	see street space
	per SF/month - assessment (over 80' bulk & height)	per SF/month	$ 17					
2	**Banners**							
	Processing	per 20 banners	$ 121	$582 (from Planning fee schedule)	Actual Cost	*no comparison available*	New: $600 Renew/Ext: $300	Event Pole Banner Issuance: $300
	Inspection	per 20 banners	$ 208					
3	**Board of Appeals Surcharge**	each	$ 10	*no comparison available*	*no comparison available*	*no comparison available*	*no comparison available*	*no comparison available*
4	**Café Tables & Chair (annual)**							
	New	each	$ 165	*no comparison available*	$1,854 + sewerage facility charge	see street space	Staff issued: $190 City Council approval: $390	see street space
	plus each additional SF	each SF	$ 9.25					
	Renewal	each	$ 82		no fee			
	plus each additional SF	each SF	$ 8.00					
	Requiring Departmental Action	each	$ 165		Actual Cost			
	plus each additional SF	each SF	$ 11					
5	**Commemorative Plaque**	each	$ 1,833	*no comparison available*	*no comparison available*	*no comparison available*	*no comparison available*	*no comparison available*
6	**Contractor Parking Plan**							
	Street Space	each	$ 765	see street space	see street space	see street space	see street space	see street space
	Excavation	each		Base Fee: $34 No Parking Sign: $15 Daily: $15.80 Weekly: $79	*no comparison available*	Short-term (14 days): Metered area: $34.50/meter/day Un-metered area: $17/25 ft/day Signs: $3/sign Long-term (15-180 days): Metered: $1,037/meter/30 days Un-metered: $519/25 ft/30 days	*no comparison available*	*no comparison available*
	Administrative Fee	each	$ 168					
	Inspection	each	$ 390					
	Modification	each	$ 69					

City of San Francisco				Comparison Agencies				
Fee No.	Fee Description	Fee Unit / Type	Current Fee / Deposit	Berkeley	LA	Oakland	Sacramento	Seattle
7	**Consultation / Pre-Application**							
	First 2 hours	hourly (2 hr. min)	$ 533	*no comparison available*	$149/hr	$174 - $199.16 per hour	$120/hr	$269/hr
	each additional hour	hourly	$ 266					
8	**Display Merchandise**			see street space	No investigation: $556 Investigation: $1,854 Board Report Required: Actual Cost ($7,000 min deposit)	see street space	see street space	see street space
	Annual	each	$ 178					
	plus each additional SF	each SF	$ 11.75					
9	**Excavation**			Filing Fee: $22 Base Permit: $127 Plan Check: $190 Insp: $153		Permit (2 hrs insp time): $454.65 Add'l insp: $211.05/hr City-performed repairs: Act Cost + 2% surcharge Admin fee: $1,953 Permit Review <300 ft: $454.65 300+ ft: $1,257.90 ea 300 ft Permit: No Fee Inspection: $180.83/hr (normal hours, $316.05/hr outside normal hours)	Min fee $74 / actual cost	*no comparison available*
	Administrative Fee							
	Small project - to 100 SF	per permit	$ 111		U Permit: $191 E Permit: $438			
	Medium project - 100 to 1,000 SF	per block	$ 140					
	Large project - 1,000+ SF	per block	$ 186		U Permit: Act Cost E Permit: Act Cost			
	General Inspection Fee							
	Small project - to 100 SF	per permit	$ 600		U Permit: $114 E Permit: $114			
	Medium project - 100 to 1,000 SF	per day	$ 92		U Permit: $2.20/sq.ft. E Permit: $2.20/sq.ft.			
	Large project - 1,000+ SF	per day	$ 136		U Permit: Act Cost E Permit: Act Cost			
	Tank removal, standard side sewer, boring/monitoring wells)	per hour	$ 150		see above			
	Utility Inspection Fee							
	Small project - to 100 SF	per permit	$ 26					
	Medium project - 100 to 1,000 SF	per day	$ 92					
	Large project - 1,000+ SF	per day	$ 136					
10	**Flower Markets**	each	$ 1,213	*no comparison available*	No investigation: $556 Investigation: $1,854 Board Report Required: Actual Cost ($7,000 min deposit)	see street space	see street space	$ 181

City of San Francisco				Comparison Agencies				
Fee No.	Fee Description	Fee Unit / Type	Current Fee / Deposit	Berkeley	LA	Oakland	Sacramento	Seattle
11	**Free Sample Merchandise**	each	$ 100	see street space	No investigation: $556 Investigation: $1,854 Board Report Required: Actual Cost ($7,000 min deposit)	see street space	see street space	*no comparison available*
12	**Inspection of Conformity**	each	$ 300	$190/hr	$149/hr	$174/hr	$120/hr	$269/hr
13	**Major Encroachment**							
	New Application	each	$ 5,748	$ 454				
	At Risk	each	NEW					
	City Attorney	each	NEW	Approval Fee: $1,774	No investigation: $556 Investigation: $1,854 Board Report Required: Actual Cost ($7,000 min deposit)	see street space	Non-billable accounts: $300 min Billable accounts: monthly invoicing Temp Street Use: $0-$75	see street space and occupancy use fee
	Annual Assessment Fee (min $100)	per SF/year	$ 5.25					
14	**Minor Sidewalk Encroachment**							
	New Application	each	$ 1,481	$ 454				
	Public Hearing Required (additional fee)	each	NEW					
	Annual Assessment Fee (min $100)	per SF/year	$ 5.25	Approval Fee: $1,228				
	Existing Conditions or Submittal with SI Permit (except shoring MSE permits)	each	$ 211					
15	**Mobile Food Facilities**							
	One (1) Location							
	Filing Fee	each	$ 228					
	Notification Fee	each	$ 277					
	Inspection Fee	each	$ 528					
	Each additional location							
	Notification Fee	each	$ 277			$100/yr or pro-rata Downtown Park Sites: $40/hr/date/site Other Park Sites: $30/hr/date/site		Annual Food-vehicle zone vending (paid parking): $478 (each 4-hr period x each day per week) Annual Food-vehicle zone vending (unpaid parking): $104 (each 4-hr period x each day per week)
	Inspection Fee - first additional location	each	$ 264	*no comparison available*	*no comparison available*		*no comparison available*	
	Inspection Fee - each additional location	each	$ 264					
	Modification of location, or hours of operation							
	Filing Fee	each	$ 117					
	Notification Fee	each	$ 277					
	Inspection Fee	each	$ 264					
	Renewal (no violations within previous year)	each	$ 183					
	Per Decal (if applicable)	each	$ 50					
16	**Nighttime Work (new application)**							
	Permit	each	$ 151	$190/hr	Weekday: $95/hr Weekend/Holiday: $380/hr (4 hr min)	$316.05/hr	$120/hr	$538/hr
	Inspection	per night	NEW					

City of San Francisco				Comparison Agencies				
Fee No.	**Fee Description**	**Fee Unit / Type**	**Current Fee / Deposit**	**Berkeley**	**LA**	**Oakland**	**Sacramento**	**Seattle**
17	**Overwide Driveway (30+ feet)**			Filing Fee: $22 Base Permit: $127 Plan Check: $190	$273 + $0.85 per sq. ft.	Permit: $433 Over 200 ft: $0.93/sq. ft.	Variance: Residential/< 2 lots: $120 Commercial/>2 lots: $320 deposit Appeal: Actual Cost Permit & Inspection: <23 ft: $250 24-35 ft: $325 36-45 ft: $400 Asphaltic Concrete: $175	*no comparison available*
	New Application	each	$ 1,158					
	Existing Condition	each	$ 211					
	Annual Assessment Fee	per SF/year	$ 5.25	see street space	see street space	see street space	see street space	see street space
	Inspection	each	$ 371	Insp: $28 per 100 sq. ft.	*no comparison available*	*no comparison available*	see street space	see street space
18	**Shared Spaces/Parklet**							
	Tier 1: Public Parklet							
	First parking space	each	$ 1,090	*no comparison available*	*no comparison available*	*no comparison available*	Staff issued: $190 City Council approval: $390	*no comparison available*
	Each additional parking space	each	$ 272					
	Annual license per parking space	each	$ 109					
	Tier 2: Movable Commercial Parklet							
	First parking space	each	$ 2,180					
	Each additional parking space	each	$ 1,090					
	Annual license per parking space	each	$ 1,635					
	Tier 3: Fixed Commercial Parklet							
	First parking space	each	$ 3,270					
	Each additional parking space	each	$ 1,635					
	Annual license per parking space	each	$ 2,180					
19	**Pipe Barriers**			*no comparison available*	*no comparison available*	*no comparison available*	*no comparison available*	*no comparison available*
	New Application	each	$ 1,040					
	Inspection Fee	per 25 ft	$ 489					
	Existing Conditions	each	$ 211					
20	**Security Bollards (new application)**			*no comparison available*	*no comparison available*	*no comparison available*	*no comparison available*	*no comparison available*
	Application Fee	each	$ 3,067					
	Inspection Fee	per 25 ft	NEW					

City of San Francisco				Comparison Agencies				
Fee No.	Fee Description	Fee Unit / Type	Current Fee / Deposit	Berkeley	LA	Oakland	Sacramento	Seattle
21	**Sidewalk Repair**	per 100 SF	$ 25	Filing Fee: $22 Base Permit: $127 Insp: $28/100 sf	$273 + $0.85 per sq. ft. No Fee if due to City tree	Voluntary: Repair: Act cost Admin Fee: $454.65 Interest on unpaid balance: 10%/5% low income Mandatory: Repair: Act cost Admin Fee: $454.65 Surcharge: 2% No Fee if due to City tree	Admin Fee: $40 Repair: Act Cost Root Inspection: $100	*no comparison available*
	Inspection Fee	each	NEW					
22	**Special Sidewalk**							
	New Application	each	$ 594	*no comparison available*	see sidewalk	see sidewalk	see street space	*no comparison available*
	Non-Std Cross Slopes, Existing Conditions/Submittal with SI Permit	each	$ 211					
	Inspection Fee (Special Coating)	each	NEW					
23	**Storage Container (registered companies only)**							
	Annual	each	$ 841	see street space	see street space	see street space	see street space	see street space
	Deposit	each	$30,000 refundable bond					
	Individual Location							
	1st Day	each	$ 84					
	2nd & 3rd Day	each	$ 169					
	Over 3 days	each	$ 169					
	plus per container / day	per container / day	$ 84					

City of San Francisco				Comparison Agencies				
Fee No.	Fee Description	Fee Unit / Type	Current Fee / Deposit	Berkeley	LA	Oakland	Sacramento	Seattle
24	**Street Improvement**			$190/hr	Class "A" Permit - $273 Insp: Curb: $3.7/lf Paving/Gutter/Sidewalk/Driveway: $0.85/sf Resurfacing: $3.30/sf Area Drain/Tree well: $15.95 each Pipe: $5.50 each Density Test: $300 ea Relative Compaction: $115 ea Concrete Cylinder Test: $100 ea Class "B" Permit: Actual Cost	$1-$5k: $1,000 $5,001-$10k: $3,046 $10,001-$50k: $3,046 + $73/add'l $1,000 val $50,001-$100k: $5,966 + $52/add'l $1,000 val $100,001-$500k: $8,566 + $47/add'l $1,000 val $500,001-$2.5 mil: $27,366 + $45/add'l $1,000 val $2.5 mil+: $117,366 + $21/add'l $1,000 val	Min fee $74 / actual cost	*no comparison available*
	Minimum Submittal Fee (w/Building Permit App) - Simple	each	$ 1,660					
	Minimum Submittal Fee (w/Building Permit App) - Complex	each	NEW					
	Minimum Notice to Repair	each	$ 554					
	Curb Cut Only Annual Assessment Fee (min $100)	per SF/year	$ 5.25	see street space	see street space	see street space	see street space	see street space
25	**Street Space**			Filing Fee: $22 Base Permit Fee: $127 Temp ROW Inspection: $190 Monthly Fee: $221	No investigation: $556 Investigation: $1,854 Board Report Required: Actual Cost ($7,000 min deposit)	City Engineer Action: New encroach: $1,781 Existing: $3,176 Private Bike Rack: $74 New Bike Share: $1,781 Encroach R3 Occup: $1,781 Amend/Recession: $1,084 City Council Action: $4,980	Encroachment - non-billable account: $300 min deposit Encroachment - billable account: monthly invoicing Encroachment - temp use: $0-$75 Revocable - no Council action: $300 Revocable - Council action - $600	ROW - Simple: $194 ROW - Complex: $698 General Long Term Issuance: $395 General Renewal: $300 Major Permits: $8,262
	Permit	each	$ 168			Obstruction - Short (14 day max): Metered: $34.50/day Un-Metered: $17/25 ft/day Obstruction - Long (15-180 day max): Metered: $1,037/meter/30 days Un-Metered: $519/25 ft/30 days		
	Occupancy Assessment	per month/per 20 LF	NEW	$7.50/LF/Month	*no comparison available*	*no comparison available*	*no comparison available*	Arterial: $0.90 - $1.40/per sf Non-arterial: $0.70 - $1.20 per sf

City of San Francisco				Comparison Agencies				
Fee No.	Fee Description	Fee Unit / Type	Current Fee / Deposit	Berkeley	LA	Oakland	Sacramento	Seattle
26	**Street Vending**							
	Application	each	$ 454	*no comparison available*	*no comparison available*	*no comparison available*	*no comparison available*	Year-Round Street/Sidewalk Activities: $200
	Renewal	each	$ 106					
27	**Temporary Occupancy**	per day / per block face	$ 84	see street space	see street space	see street space	see street space	see street space
28	**Transit Shelters (registered companies only)**							
	New Location	each	$ 470	*no comparison available*	*no comparison available*	*no comparison available*	*no comparison available*	*no comparison available*
	Existing location (if no public notice required)	each	NEW					
29	**Vault (Transformer) Encroachment**							
	New Application	each	$ 1,536	see street space	see street space	see street space	see street space	see street space
	Annual Assessment Fee	per SF/year	$ 19.75	see street space	see street space	see street space	see street space	see street space
30	**SFMTA Parking Meter Occupancy Fees**	per 25 LF / day	$ 18	*no comparison available*	*no comparison available*	*no comparison available*	*no comparison available*	*no comparison available*
31	For services requested of City staff which have no fee listed in this fee schedule. Additionally, the City will pass-through to the applicant any discrete costs incurred from the use of external service providers if required to process the specific application.	hourly	$ -	$ 190	*no comparison available*	*no comparison available*	*no comparison available*	*no comparison available*

APPENDIX B.2

Comparative Fee Survey – Bureau of Street-Use and Mapping – Subdivision and Mapping Division

City of San Francisco				Comparison Agencies				
Fee No.	Fee Description	Fee Unit / Type	Current Fee / Deposit	Berkeley	LA	Oakland	Sacramento	Seattle
II	**SUBDIVISION AND MAPPING**							
1	**Application Processing**	each	$ 1,000	*no comparison available*	*no comparison available*	*no comparison available*	*no comparison available*	*no comparison available*
2	**Parcel Map**							
	Condominium Conversions of 4 Units or Less	each	$ 12,429	*no comparison available*	Prelim Parcel: Map: $8,240 Revision/Mod: $824 Exemption: $1,262 Tent Sub: < 20: $8,240 >= 20: Act Cost Revision/Mod: $1,854	Condominium Conversion: $3,624 Tentative Map: $6,532	Tentative map (parcel, master parcel, sub): $1,000 deposit Extension: $950	*no comparison available*
	New Construction Condominiums & Subdivisions of 4 Units or Less	each	$ 11,518					
	plus per lot	per lot	$ 50					
3	**Final Map**							
	Condominium Conversions of 5 or 6 Units	each	$ 12,592	*no comparison available*	Final Parcel: $8,240 Resubmit: $824 Reversion to acerage: $1,854 Waiver: $1,262	Final map: $4,033.50 first 2.5 hours, $417.90 each additional 2 hrs	Final Parcel: $3,200 deposit Final Sub: $3,800 dep + $25/lot Master Parcel check: $3,800 deposit	*no comparison available*
	plus per lot	per lot	$ 50					
	plus per lot (air space subdivision)	per lot	$ 806					
	New Construction Condominiums & Subdivisions of 5 Units or More	each	$ 12,592		Final Sub: <20: $8,240 >=20: Act Cost Resubmit: $824 Reversion to acerage: $2,549			
	plus per lot	per lot	$ 50					
	plus per lot (air space subdivision)	per lot	$ 806					

City of San Francisco				Comparison Agencies				
Fee No.	Fee Description	Fee Unit / Type	Current Fee / Deposit	Berkeley	LA	Oakland	Sacramento	Seattle
4	**Vertical Subdivision Map**							
	Parcel Map (4 Lots or Less)	each	$ 12,852	*no comparison available*	Airspace: Actual Cost	*no comparison available*	*no comparison available*	*no comparison available*
	Final Map (5 Lots or More)	each	$ 12,852					
	Each Additional Lot (air space subdivision)	each	$ 806					
5	**Vesting Tentative Map**	each	$ 13,592	*no comparison available*	*no comparison available*	*no comparison available*	$950 dep	*no comparison available*
6	**Amended Map**	each	$ 4,357	*no comparison available*	Parcel: $824 Sub: $1,854	$1,709/map	$600 dep	*no comparison available*
7	**Lot Line Adjustment**	each	$ 4,357	$1,743 plus $588 deposit	no comp	$ 320	2-4 parcels: $2,600 > 2 acres: $2,600 dep	$ 1,970
8	**Certificate of Compliance**	each	$ 3,446	*no comparison available*	$ 1,262	First 6 hours: $1,311 Each add'l: $226.80/hr	Lot splits: $1,800 Lot mergers: $2,300 Admin fee waiver: $1,000 dep	*no comparison available*
9	**Certificate of Correction**	each	$ 3,446	*no comparison available*	*no comparison available*	$ 1,157	$600 dep	*no comparison available*
10	**Sidewalk Legislation, Street Vacation**	per block	$ 3,293	*no comparison available*	Actual Cost	City Council: $4,980 City Engineer: $2,564 Shared Access Eng Review: $1,804	$ 2,500	$ 6,500
	Additional Fee (fronting/re-circulation)	per lot	$ 1,750					
11	**Record of Survey**	each	$ 816	*no comparison available*	*no comparison available*	*no comparison available*	*no comparison available*	*no comparison available*
12	**Corner Record**	each	$ 25	*no comparison available*	*no comparison available*	Pre-const: $2,228.10 Post-const: $522.90	*no comparison available*	*no comparison available*
13	**Department of Building Inspection (DBI) Review Fee**	each	$ 538	*no comparison available*	*no comparison available*	*no comparison available*	*no comparison available*	*no comparison available*

City of San Francisco				Comparison Agencies				
Fee No.	Fee Description	Fee Unit / Type	Current Fee / Deposit	Berkeley	LA	Oakland	Sacramento	Seattle
14	**Pre-application Meeting or Staff Consultation (first 2 hours)**	hourly	$ 533	*no comparison available*	$149/hr	$174 - $199.16 per hour	$120/hr	$269/hr
	each additional hour	hourly	$ 266					
15	**Project Reinstatement (Untermination)**	each	$ 1,000	*no comparison available*	*no comparison available*	*no comparison available*	$ 500	*no comparison available*
16	**Incomplete Submittal**	each	$ 500	*no comparison available*	*no comparison available*	*no comparison available*	*no comparison available*	*no comparison available*
17	**Appeal of Tentative Map Decision Fee**	each	$ 381	*no comparison available*	*no comparison available*	*no comparison available*	*no comparison available*	*no comparison available*
18	**Monument Reference**	each	$ 4,070	*no comparison available*	*no comparison available*	$ 6,757	*no comparison available*	*no comparison available*
19	For services requested of City staff which have no fee listed in this fee schedule. Additionally, the City will pass-through to the applicant any discrete costs incurred from the use of external service providers if required to process the specific application.	hourly	$ -	*no comparison available*	*no comparison available*	*no comparison available*	*no comparison available*	*no comparison available*

APPENDIX B.3

Comparative Fee Survey – Bureau of Urban Forestry

City of San Francisco				Comparison Agencies				
Fee No.	Fee Description	Fee Unit / Type	Current Fee / Deposit	Berkeley	LA	Oakland	Sacramento	Seattle
III	**URBAN FORESTRY**							
1	**Sidewalk Landscaping**							
	Non-Construction Related							
	One (1) Property	per app	$ 340		no cost			
	2-4 Properties	per app	$ 292					
	5+ Properties	per app	$ 253					
	Construction Related			*no comparison available*		*no comparison available*	*no comparison available*	*no comparison available*
	Single Property / Small Parcel / Residential - Retroactive (no changes required)	per app	NEW					
	Up to 25 lf of frontage	flat	NEW		*no comparison available*			
	26-75 lf of frontage	flat	NEW					
	76-200 lf of frontage	flat	NEW					
	201+ lf of frontage	flat	NEW					
2	**In-Lieu Tree Fee**	per tree	$ 2,431	*no comparison available*	Development Tree Planting: $2,612 per tree Public Works Tree Planting: $1,945 per tree (reduced by $267 per tree for residential property with 4 or fewer dwelling units)	$619/tree	Trees other than palm trees - $325 per inch DSH Palm Trees - $100 per linear foot	*no comparison available*

City of San Francisco				Comparison Agencies				
Fee No.	Fee Description	Fee Unit / Type	Current Fee / Deposit	Berkeley	LA	Oakland	Sacramento	Seattle
3	**Tree Removal Permit Application**							
	Non-Construction Related							
	1 - 3 Trees	flat	$ 458	*no comparison available*	Broadhead/Palm: $343 <10: 2% surcharge Oak Trees: $1,084	Non-development: 1-10: $503.53 11+: $503.53 + $10/tree Development: 1-10: $503.53 11-100: $503.53 + $10/tree 100+: $503.53 + $125.83/hr	$50 application fee	Performing • a street tree removal, • a street tree planting, • major pruning of street tree branches or roots greater than 2" diameter, or • major pruning comprising more than 15% of foliagebearing area: no cost Work is on an arterial street and will take more than 2 hours per day: $599 + Street Use fees + $98 review fee Work is on a non-arterial street and will take more than 8 hours per day:$599 + Street use fees Work is in Hub Area or High Impact Area downtown: $98 Review fee
	4-9 Trees	flat	$ 1,228					
	10+ Trees	flat	$ 1,845					
	Construction Related							
	1 - 3 Trees	flat	$ 923					
	4-9 Trees	flat	$ 1,228					
	10+ Trees	flat	$ 1,845					

City of San Francisco				Comparison Agencies				
Fee No.	Fee Description	Fee Unit / Type	Current Fee / Deposit	Berkeley	LA	Oakland	Sacramento	Seattle
4	**Tree Protection Plan**							
	1-3 Trees	per app	$ 151	*no comparison available*	*no comparison available*	*no comparison available*	*no comparison available*	*no comparison available*
	4+ Trees	per app	$ 151					
5	**New Planting (standalone, no tree removal permit)**							
	Non-Construction Related		NEW	*no comparison available*	*no comparison available*	*no comparison available*	*no comparison available*	*no comparison available*
	Construction Related							
	Up to 50 lf of frontage	each	NEW	Tree planting in public-right of-way: City plants a tree or residents can plant their own tree All trees considered City property Pruning to be done by City Staff Resident will water for at least 3 years (approx 20 gal per week for 7 mo)	15 gallon: $427 24" box size: $434	Concrete cutting: Actual Cost 15 gallon: $490.26 24" box size: $814.39	Corner lot: $200 per tree Interior lot: $100 per tree	no cost
	51-125 lf of frontage	each	NEW					
	126-250 lf of frontage	each	NEW					
	251+ lf of frontage	each	NEW					
6	**Reinspection Fee / Additional Site Visit**	per inspection	NEW	*no comparison available*	*no comparison available*	*no comparison available*	*no comparison available*	*no comparison available*
7	**Billboard Permit**	each	$ 300	*no comparison available*	*no comparison available*	*no comparison available*	*no comparison available*	*no comparison available*
8	For services requested of City staff which have no fee listed in this fee schedule. Additionally, the City will pass-through to the applicant any discrete costs incurred from the use of external service providers if required to process the specific application.	hourly	$ -	*no comparison available*	*no comparison available*	*no comparison available*	*no comparison available*	*no comparison available*

APPENDIX C

Fee Study Sensitivity Analysis

Urban Analytics

Memorandum

To: Bruce Robertson, Deputy Director for Financial Management and Administration, San Francisco Department of Public Works
From: David Mealy
RE: San Francisco Department of Public Works Fee Study Sensitivity Analysis
Date: May 23, 2023
CC: Nicole Kissam, NBS; Lauren Guido, NBS

Introduction

As part of the scope of the Fee Study for the San Francisco Department of Public Works (the Department), NBS and Urban Analytics were asked to facilitate the Department's review of the benefits of different types of fees for service activities through an analysis of potential market sensitivities to those fees and the interaction of those fees with established Department goals and policies. This memorandum sets out the results of our sensitivity analysis.

Summary

Permit fees are a cost recovery mechanism for public agencies, compensating for the time and materials needed to ensure projects meet public safety and regulatory requirements. Fee reductions, deferrals, waivers and rebates are employed in San Francisco and elsewhere to further particular public policies, provide needs-based assistance on a case-by-case basis, offset past inequities for defined populations and as an emergency response tool. Revenue forgone from fee reduction, waivers and rebates can be treated as non-recoverable, be capped to limit budget impact, be offset by outside funding, be provided in return for other impact mitigation, or simply be treated as a cost necessary to achieve larger public policy goals; however, the forgone revenue cannot be recaptured from increased fees on other fee-payers.

San Francisco has implemented a number of innovative policies to reduce permitting costs in response to the economic hardships caused by the COVID-19 pandemic, including permit streamlining, notification waivers and business license, permit and tax waivers. Some of these and other policies have been extended post-pandemic to ameliorate the impact fees may have on particular public policy goals intended to rebuild San Francisco's economic resilience and increase housing supply.

Background

The initial scope for this task was developed in conjunction with Department staff in late 2019, a time when soaring costs for both housing and commercial space were raising concerns about the affordability of the City for residents and small businesses. The focus of this portion of the fee study at the time was on potential impacts related to the retention of both businesses and affordable housing in the City.

In the intervening three years, the shelter-in-place requirements brought on by the COVID pandemic upended the local economy by virtually eliminating most local activity related to office, retail, restaurant, tourism, hospitality, the arts and sports for much of that period. The pandemic also brought to the fore social equity issues around exposure to COVID for essential service workers, often people of color living in close quarters because of the lack of housing affordability. Beyond the pandemic, racial justice and systemic racism became a major and ongoing public concern with the deaths of numerous Black Americans at the hands of law enforcement as well as with racist attacks here and elsewhere on Asian Americans and Pacific Islanders.

The City established the Office of Racial Equity (ORE) as a division of the Human Rights Commission in 2019 and required all departments within the City to prepare a Racial Equity Action Plan in two phases. The first phase, completed in January 2021, focused on the internal dynamics and operations of City departments and the second phase focusses on how they deliver services and community programs. The ORE is charged with implementing, among other things, a Racial Equity Policy Analysis Tool for Legislation at the Board of Supervisors to illuminate the impact of policy on communities of color as well as a Budget Equity Tool to assess how the City budget decisions and priorities benefit and/or burden communities, specifically communities of color.

The challenges of retaining small businesses and residents that were top-of-mind in 2019 remain a major concern today. These issues have been exacerbated by the pandemic-caused economic shutdown and subsequent layoffs in technology, restaurant, hospitality and other industry sectors, leading in part to a 7.5% decline in San Francisco's population[1] – conditions that are a near inverse of

the overheated economy three years ago. The following analysis will focus on particular tools – cost-recovery adjustments, waivers, deferrals and rebates – related to permit fees that have been employed by San Francisco and other cities.

Analysis

User fees and regulatory fees in California must be adopted by the elected governing body during a public hearing[2] and may not exceed the full cost of providing services for which the fee is charged[3]. In other words, the cost recovery rate achieved by a fee may not be greater than 100%. Local governments will typically select cost recovery targets that meet local priorities. Targets can be applied to fee programs such as recreation services, or to individual fees such as a building permit for a water heater.

A general means of selecting an appropriate cost recovery target is to consider the public and private benefits of the service or activity in question:

- To what degree does the public at large benefit from the service?
- To what degree does the individual or entity requesting, requiring, or causing the service benefit?

When a service or activity completely benefits the public at large, significantly lowered fee amounts as relates to costs of providing services typically apply. A low or 0% cost recovery policy for a service or fee program reflects a policy directive to subsidize a service, utilizing general funds from taxes or other sources than fees to finance the services provided. Conversely, when a service or activity completely benefits an individual or entity, there is generally closer or equal to 100% of cost recovery from fees collected from the individual or entity.

Each governing body establishes fee amounts in accordance with local community goals including code compliance, financial constraints, economic development, social values, and equity considerations. Once fees are established, waivers, deferrals, reductions and rebates are all additional tools and incentives that can be applied in response to particular circumstances such as economic need, racial and social equity or disaster response.

Targeted Fee Mitigation

While the Covid pandemic is generally considered to be behind us, and the public health shut-down orders have ended, the City's economy is still reeling from the pandemic for several reasons: most businesses had to close for some time during the pandemic and many never re-opened; some re-

opened but owe back rent and City fees that were deferred; many businesses are open but don't have clientele, staff, cash flow, tourist spending, etc. that they had before the pandemic began.

According to a recent report by the San Francisco Controller's Office[4], businesses located in the downtown core were decimated by the pandemic and some have not rebounded,[5] with office vacancies above 25%. A significant number of office workers have been laid off, not fully returned to downtown offices or are working hybrid schedules while many employers have given up or sublet their San Francisco office leases or shut down altogether Although the public-health crisis is largely over, many San Francisco businesses of all types, especially downtown and in industrial areas, small and homegrown, and those in low-income communities, are still struggling and likely will be for the foreseeable future.

To identify where businesses most in need of economic support are located, the San Francisco County Transportation Authority developed a map identifying "communities of concern" by several demographic measures at a census block group level that is useful for this purpose[6]. In addition, the San Francisco Controller's Office released The Status of the Re-Opening of the San Francisco Economy in November 2022[7] that shows new business licenses by type pre- and post-Covid. A 2015 collaboration between U.C. Berkeley's Urban Displacement Project and the Mayor's Office of Housing and Community Development produced a map of gentrification and displacement risk by census tract[8]. The San Francisco Office of Cannabis' Equity Applicant program uses a map to qualify applicants by residency in particular census tracts with 17% or more of households at or below the federal poverty level[9]. There are a number of broad strategies in furtherance of racial and social equity goals in Oakland and Alameda County described in reports from PolicyLink[10] and the Dellums Institute[11].

The San Francisco Department of Public Health tracking of Covid by neighborhood[12] shows the highest rates of infection, hospitalizations and death were and continue to be in low-income communities of concern. The data also shows significant overlap between negative economic impacts from the pandemic with low-income communities of concern that also experienced the City's highest rates of Covid infection and death. As the City evaluates ways to mitigate the Department's fee impacts a focus should be maintained on historically underserved, low-income, disproportionately BIPOC (Black, Indigenous and People of Color) neighborhoods as defined by SFCTA, SFDPH, and others.

In addition to geographic targeting of fee mitigation, it is also important to look at the variety and types of businesses that interface with the Department, pay permit fees, and may also be impacted

by the post-Covid struggle to regain a foothold in the City. Many retailers, food and hospitality, and sales/service providers downtown, in neighborhood commercial districts, and especially in communities of concern, still do not have sufficient clientele, staff or cash flow to be stable or thrive.

Restaurants (primarily) were thrown a lifeline during the pandemic by being allowed to open "Shared Spaces" or "parklets" on City streets and sidewalks. The Department administers this program which has evolved over time in terms of locations, construction and material requirements, permit costs, etc. The initial permit fees were waived during the pandemic and legislation was recently introduced to eliminate permit fees for "curbside" Shared Spaces entirely[13]. Other recently passed legislation extends the grace period for an additional 120 days for permit applicants to operate under pandemic Shared Spaces permits and convert the shared spaces use into a post-pandemic permit.

Many businesses quickly opened shared spaces with materials on hand, only to find after opening that they didn't meet the evolving criteria (for example, spaces on the street near intersections had to remove the upper "ceilings" so fire trucks could navigate around corners safely)[14]. The cost of building the spaces, then altering them, was too expensive for some businesses, and many were removed or abandoned. But these spaces effectively saved the life of San Francisco neighborhoods by enabling residents to gather safely outdoors, eat together with family and friends, and bring activity back to the streets. While not without controversy, the Shared Spaces program (also the JAM program – Just Add Music – that allows live music in Shared Spaces) was a success story that came out of the pandemic and helped keep neighborhood commercial districts alive. Whether the recently-introduced legislation passes, fee mitigation could be prioritized in low-income communities of concern that had a harder time building and maintaining Shared Spaces due to long-standing poor street conditions and exacerbated economic challenges. The same prioritization could be applied to fee mitigation for stand-alone outdoor tables and chairs.

Food trucks were key to feeding residents safely during the pandemic, either individually or collectively in outdoor food hubs. While they also come with some controversy (some feel they compete unfairly with near-by brick-and-mortar restaurants), food trucks can add economic and social life to City streets, in parks, and in the downtown core. Fee mitigations could be applied to permit applications for food trucks located in communities of concern, in neighborhood parks, and downtown to help bring vitality to areas that are struggling or that need more "eyes on the streets".

Street vendors also fall within the Department's permitting purview. The City has stepped up permit requirements and enforcement recently due to complaints about an increase in unpermitted and unmanaged street vendors around the City. These actions have been noted by the City's Office of

Racial Equity as problematic because street vendors may be targeted unfairly due to ethnicity, immigrant status and/or locations. The Office issued an analysis[15] that discourages permit requirements/enforcement and instead recommends designing enforcement based on the needs of the vendors.

Businesses in industrial areas zoned as PDR (Production, Distribution and Repair) - are experiencing a lack of basic City services (street and sidewalk construction, repair and maintenance, parking enforcement, timely SF311 report responses, pedestrian infrastructure upkeep, safety oversight, etc.) that are prioritized in commercial and residential areas in part because of pandemic-related budget and staff shortages. This leads to economic hardship for PDR businesses as well as potential danger to workers and clients.

PDR areas often are located in communities of concern that have been historically underserved long before the pandemic. For example, in the Bayview, many streets are deemed "unaccepted" as public rights-of-way by the City and therefore are not maintained by City agencies including the Department. As a result, public infrastructure and roadway conditions do not meet City standards nor serve employers and workers in these areas. These conditions themselves may have occurred due to under-investment, red-lining and other longstanding policies that were (and continue to be) the product of social inequality and racism[16]. Businesses on these and other streets in industrial areas rely on the Department for basic upkeep of public rights-of-way but often do not receive the services that their commercial and residential counterparts receive, even though they are subject to the same permit fees and taxes. Many of these PDR businesses are food-service related (for example non-profits like Meals on Wheels and the SF Produce Market, family-owned firms like BiRite and Legacy Businesses like Wilcox Foods) while others are large anchor businesses like Amazon and Prologis; many have workers that arrive at night and by public transportation and most have delivery and distribution requirements that rely on public infrastructure.

While the Department issues permits for General Excavation and Major Encroachments for new building construction, the November 2022 SF Controller's Economic Report highlighted a weakening housing market and decline in residential permit activity. Housing-related fee mitigation opportunities could help reverse this trend. The Board of Supervisors recently passed legislation to allow 4 and 6-unit dwellings in RH (residential housing) zones throughout the City. The legislation is intended to increase housing availability and affordability for City residents. However, the City's Office of Racial Equity reviewed the legislation[17] and noted concerns that low-income communities of color may be inadvertently negatively impacted by this legislation because the cost would be so high

that only the most expensive units could be built, perpetuating exclusionary zoning and worsening the City's racial wealth gap.

Other Forms of Fee Mitigation

Annually in May, the Department and DBI waive 18 of the 23 permit fees normally charged for awning replacement and pedestrian lighting as part of a Small Business Month support program. These waivers apply to small businesses (100 or fewer employees) submitting over-the-counter permit applications for these storefront improvements during May; the applicant submits a simple one-line affidavit attesting to their employee count[18]. The City has also implemented the "First Year Free" program to waive certain first-year permit, license and business registration fees from November 2021 through June 2023[19].

In 2020, the City implemented voter-approved Proposition H, the Save Our Small Businesses Initiative, imposing a number of amendments to the Planning Code and the Business and Tax Regulations Code[20]. These include a coordinated, simplified and expedited 30-day review process among City departments for storefront commercial uses principally permitted in Neighborhood Commercial Districts and Neighborhood Commercial Transit (NCT) Districts, elimination of neighborhood notifications for most storefront land use changes in Neighborhood Commercial Districts, and other changes intended to provide small businesses with added flexibility in adapting their operations to current conditions. To the extent that they reduce the number of fee-based permits required for covered projects, these changes could have the effect of reducing fees [21]. The Initiative implemented a waiver for fees charged by any City department for additional reviews that result from errors in that department's interpretation of code requirements or their determination of required approvals [22].

The City has instituted a number of programs offering financial assistance to small businesses affected by the pandemic. Among these is a program funding business license and registration fee deferrals for restaurants, subsequently turned into one-year fee waivers, and two-year business license and registration fee waivers for entertainment venues; both types of businesses also received waivers of their payroll taxes for 2020 [23]. These fee waivers are limited to businesses with qualifying permit types and gross receipts under certain amounts.

San Francisco also offers a cannabis equity program similar to those in Los Angeles, Oakland and elsewhere that includes priority permit processing and application and cannabis business permit fee waivers[24].

On March 23, 2023, Mayor Breed announced a new legislative proposal of over 100 changes in the Planning Code to facilitate easier permitting for small businesses, encourage economic recovery and growth, and fill commercial vacancies. This comes after passing Prop H in 2020 (Save Our Small Business Initiative) and the Small Business Recovery Act (expanded provisions in Prop H to NCTs and other commercial areas, added use flexibility, deleted the definition for a few uses so they fall under General Retail, etc.). According to the Mayor's office, "…*since the City began implementing Proposition H in January 2021, over 3,500 businesses have benefited from the program, which allows more commercial projects to be processed within a shorter timeframe as over-the-counter permit applications are processed immediately upon submission*". In addition, Prop H and the Small Business Recovery Act enabled the Office of Small Businesses to add two new Small Business Permit Specialist positions in March 2022 that have supported over 870 business owners with researching permit requirements, serving as a main point of contact for permits being routed through multiple agencies, and resolving permitting questions. A new Permit Center[25] opened in July 2021 and offers 23 distinct service areas through the Planning Department, Department of Building Inspection, Department of Public Health and Department of Public Works, among others. The Mayor's office says, "*By centralizing services in one place, customers can move between permitting departments efficiently, resulting in a better experience and improved government function. Since the start of this year, the Permit Center has served an average of 191 customers per day and provides on average 531 services daily"*.

As of April 2023, the Mayor's new legislative proposal had not been introduced at the Board of Supervisors so the additional code changes are not yet available for review. In her announcement[26] the Mayor gives some information as to how her proposal will be applied to permit changes to expand small business reforms tailored to neighborhood commercial areas – they include:

- Reduce the number of barriers small businesses experience when trying to open a new storefront or expand into a new space;
- Provide small business entrepreneurs greater flexibility to adapt to the changing times caused not only by the pandemic, but also due to shifts in consumer behavior as seen globally;
- Allow more businesses to open without going through the months-long Conditional Use Authorization process by principally permitting more uses throughout the City, and reducing the ability for appeals to cause even longer delays;
- Allow more business use types to open on the ground floor to provide more options in filling vacant commercial ground floor spaces;

- Address challenges for venues that provide entertainment and/or alcohol, as well as for businesses that offer outdoor patios for patrons

These all appear to be changes to Planning/Building permit processes but there may be changes to the Department permitting included as well. It should also be noted that these changes are focused on easing permitting for small businesses, while the Department permit fee mitigations we are discussing may apply to other sorts of businesses as well as small businesses.

As noted previously, San Francisco recently implemented business license and registration fee waivers as well as payroll tax waivers for entertainment venues and restaurants in response to the widespread economic damage done to those business sectors by the pandemic. These waivers represent foregone general fund revenue in an amount that was somewhat predictable based on the number of permits for establishments that fall within the revenue limits, and were authorized by the Board of Supervisors as a citywide response to a citywide issue. The City also allows annual fee waivers for certain storefront improvements by small businesses, at a minimal cost to the City.

Conclusions

Fee waivers and reductions through permit consolidation has been a prominent strategy with respect to small businesses as the City emerges from the pandemic. This strategy can be extended to meet racial and social equity goals as well by, among other means, geographic targeting of fee waivers and permit streamlining.

While the actual delineation of neighborhoods and communities would be determined in close collaboration with individuals, organizations and representatives in those communities, several tools are available to facilitate such targeting.

Examples of equity programs that could incorporate fee waivers include:

- Legacy and Anchor Business Retention:
    - Legislation passed in 2021 established a Neighborhood Anchor Business Registry which is managed, in addition to the Legacy Business Program, by the Office of Small Business for businesses located at or near their original location for over 15 years. Assistance offered to Anchor Businesses must be consistent with the City's racial equity and language access goals. Permit fee waivers or rebates could be offered to Anchor Businesses located in communities of concern.

- Anti-Displacement:
    - Aging-in-place programs: fee waivers for improvements required to enable elderly residents to remain in their homes or with their families; the target communities could be geographic areas identified as experiencing displacement having large elderly populations.
    - Retention of long-time residents: waivers of permit fees for long-time residents buying homes in their neighborhoods, targeting communities experiencing high levels of displacement with residential longevity established through public records, neighborhood organizations or other means.
- Anti-Racism:
    - First-time homebuyers from previously redlined areas, areas that experienced displacement through urban renewal and redevelopment, segregated public housing developments or other areas in which homeownership was closed off for communities of color could be provided with fee waivers for home renovations for a period of time after a home purchase; eligibility criteria would be developed in conjunction with the communities affected.

Waivers and reductions have been demonstrated as reasonable to effective, especially in communities of concern. Fee deferrals are not recommended because many businesses still owe what they deferred during the pandemic and may never be able to pay, let alone future deferred fees. Fee rebates are not very helpful because they require paying the full fees at the outset, and many businesses (some new and some existing but struggling) still can't afford them.

Gross receipts may not be an appropriate measure for fee mitigations post-pandemic because most businesses took a big hit during Covid and many have not fully come back, so their gross receipts may not be an accurate measure for the foreseeable future. On the other hand, fee mitigation could be directed to businesses that stayed afloat but whose gross receipts dropped by a significant percentage between 2019 – 2023 (50% for example).

As discussed previously, businesses that are deemed small (less than 100 employees), Legacy Businesses and Anchor Businesses could be prioritized for Department fee waivers or reductions, especially in communities of concern, or where new business licenses are still lagging post-pandemic according to the SF Controller's Office.

Recognizing that Department fees are only part of the permit and regulatory fees that apply to most commercial and residential projects, fee waivers implemented solely by the Department in the

absence of similar waivers of other departmental fees would be less effective than a coordinated fee waiver program across all departments. Coordinated fee reductions through permit consolidation, streamlining and expediting, such as those implemented through Proposition H, would serve a similar end. The "First Year Free" small business fee waivers program may serve as a model for the application of fee waivers in other circumstances, including meeting City goals for racial and social equity.

Permit fee waivers that are part of broader multi-departmental programs to achieve economic, racial and social equity goals will require Citywide administration to establish eligibility criteria and provide consistent and funded program administration across departments. There are a number of programs in San Francisco – pandemic-related business assistance and public health outreach, cannabis equity, affordable housing, homeless assistance – that are interdepartmental in nature and may provide useful models.

[1] The San Francisco Standard It's Official: A Quarter Million People Fled the Bay Area Since Covid, March 31, 2023
[2] California Government Code 66016
[3] California Constitution Article XIII C, Section 1
[4] San Francisco Controller's Office Status of the San Francisco Economy, January 2023
[5] Yahoo.com Houston, Dallas Lead the Country in Office Attendance and Empty Office Space, April 16, 2023
[6] San Francisco County Transportation Authority Equity Priority Communities map
[7] San Francisco Controller's Office Status of the Re-Opening of the San Francisco Economy, November 2022
[8] Urban Displacement Project, U.C. Berkeley Mapping Displacement, Gentrification and Exclusion in the San Francisco Bay Area, 2015
[9] San Francisco Office of Cannabis Equity Applicant Eligibility Criteria
[10] PolicyLink and the City of Oakland, A Roadmap Towards Equity: Housing Solutions for Oakland, California, 2015
[11] The Dellums Institute for Social Justice, Saving Homes Today: Immediate Anti-Displacement Solutions for the Alameda County Housing Bond, April 2016
[12] San Francisco Department of Public Health Covid-19 Case Maps
[13] San Francisco Board of Supervisors Shared Spaces legislation
[14] Impacts on small businesses developed through conversations with Dee Dee Workman, Workman Associates San Francisco, May 2023; Ms. Workman is a policy advisor to San Francisco's small business community.

[15] ORE Racial Equity Impacts - Street Vendor Regulation
[16] Unaccepted Streets in Bayview Hunters Point
[17] ORE Racial Equity Impacts - Density Exceptions in Residential Districts
[18] Small Business Month Fee Waivers Affidavit
[19] San Francisco Office of the Treasurer and Tax Collector First Year Free
[20] Proposition H Implementation Press Release, November 19, 2020
[21] Conversation with Dee Dee Workman, Ibid.
[22] San Francisco Municipal Code, Article 1, Section 32(f), added by Proposition H, effective 12/18/2020
[23] News Release: Mayor London Breed's Legislation Providing Fee Waivers and Deferrals for Small Businesses Passes at Board of Supervisors, Jan 5 2021

[24] San Francisco Police Code Section 1604
[25] SF.GOV: San Francisco Permit Center
[26] San Francisco Office of the Mayor Small Business Permitting Improvements and Permit Center, March 23, 2023

San Francisco Infrastructure Nexus Analysis

DECEMBER 2021

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Acronyms

ACS ..... American Community Survey
AICCIE ..... Annual Infrastructure Construction Cost Inflation Estimate
BART ..... Bay Area Rapid Transit
BSP ..... Better Streets Plan
CIP ..... Capital Improvement Program
CPC ..... Capital Planning Committee
DCYF ..... Department of Children, Youth and Their Families
DTX ..... Downtown Extension
EMS ..... Emergency Medical Services
FAR ..... Floor Area Ratio
GSF ..... Gross Square Feet
LEHD ..... Longitudinal Employer-Household Dynamics
LOS ..... Level of Service
PDR ..... Production, Distribution, and Repair
SFDPW ..... San Francisco Department of Public Works
SFFD ..... San Francisco Fire Department
SFHSA ..... San Francisco Human Services Agency
SFMTA ..... San Francisco Municipal Transportation Agency
SFOECE ..... San Francisco Office of Early Care and Education
SFPL ..... San Francisco Public Library
SFRPD ..... San Francisco Recreation and Parks Department
SOGR ..... State Of Good Repair
SPU ..... Service Population Unit(s)
SUD ..... Special Use District
TIDF ..... Transportation Impact Development Fee
TSF ..... Transportation Sustainability Fee

1 Introduction

In 2019, the San Francisco Planning Department, the Office of Resilience and Capital Planning, and the City Attorney's Office retained Hatch Consulting to update the nexus analysis for the City and County of San Francisco ("City"). This nexus analysis update accompanies the *2021 San Francisco Infrastructure Level of Service Analysis* report also prepared by Hatch, which established the levels at which various infrastructure elements are provided across the City. The level of service ("LOS") targets for infrastructure presented in this report build directly on the standards developed as part of the *2021 San Francisco Infrastructure Level of Service Analysis* report, as well as existing nexus studies for certain infrastructure types in San Francisco.

1.1 Report Purpose

The purpose of this report is to document the nexus, or relationship, between new development in the City and the need for additional facilities for: recreational and open space, child care, complete streets, transit, library, and fire department infrastructure. As new residential and non-residential development occurs, it brings an increased demand for new (or expanded and improved) community infrastructure. This analysis measures the need for community infrastructure using a methodology that meets the requirements for development impact fees under applicable law, including the California Mitigation Fee Act. The analysis estimates the impacts created by new development on the City's needs for new facilities and community infrastructure that contribute to the livability and overall quality of life in San Francisco.

The citywide nexus analysis, building upon existing adopted nexus studies, aims to develop an objective methodology for evaluating impact fees, thus justifying the City's future administration of impact fees, and meet the requirements of Article 4 of the Planning Code.

This study satisfies the requirements of Section 410 of the City Planning Code, which requires that all nexus studies be updated on a five-year basis: the nexus analysis presented in this report aims to justify most impact fees in Article 4 of the Planning Code going forward, except those pertaining to affordable housing and community stabilization. The nexus analysis complies with the requirements of California's Mitigation Fee Act, and state and federal constitutional law.

1.1.1 Report Structure

The remainder of the introduction will provide background on nexus fees, catalogue San Francisco's existing impact fees, outline the nexus fee determination methodology, and summarize the maximum supportable nexus fees. The following chapters of the report address each of the six infrastructure elements: (1) recreational and open space, (2) child care, (3) complete streets, (4) transit, (5) library, and (6) fire department infrastructure.

1.2 Background on Development Impact Fee Programs

Although local governments began charging impact fees in the 1920s as a way to finance infrastructure, in 1987, the California legislature passed the Mitigation Fee Act (Assembly Bill 1600 or the Act) to establish principles governing impact fee exactions and, to some extent, codify existing constitutional requirements. Government Code Sections 66000-66025 establish legal requirements to implement a development fee program for fees that meet the terms of the Act. According to the Act, to establish a development fee program, a jurisdiction must legislatively accept a nexus study that identifies:

- The **purpose** of any fees;
- How fees will be **used**;
- A **reasonable relationship** between the fee-funded infrastructure and the type of development paying the fee;

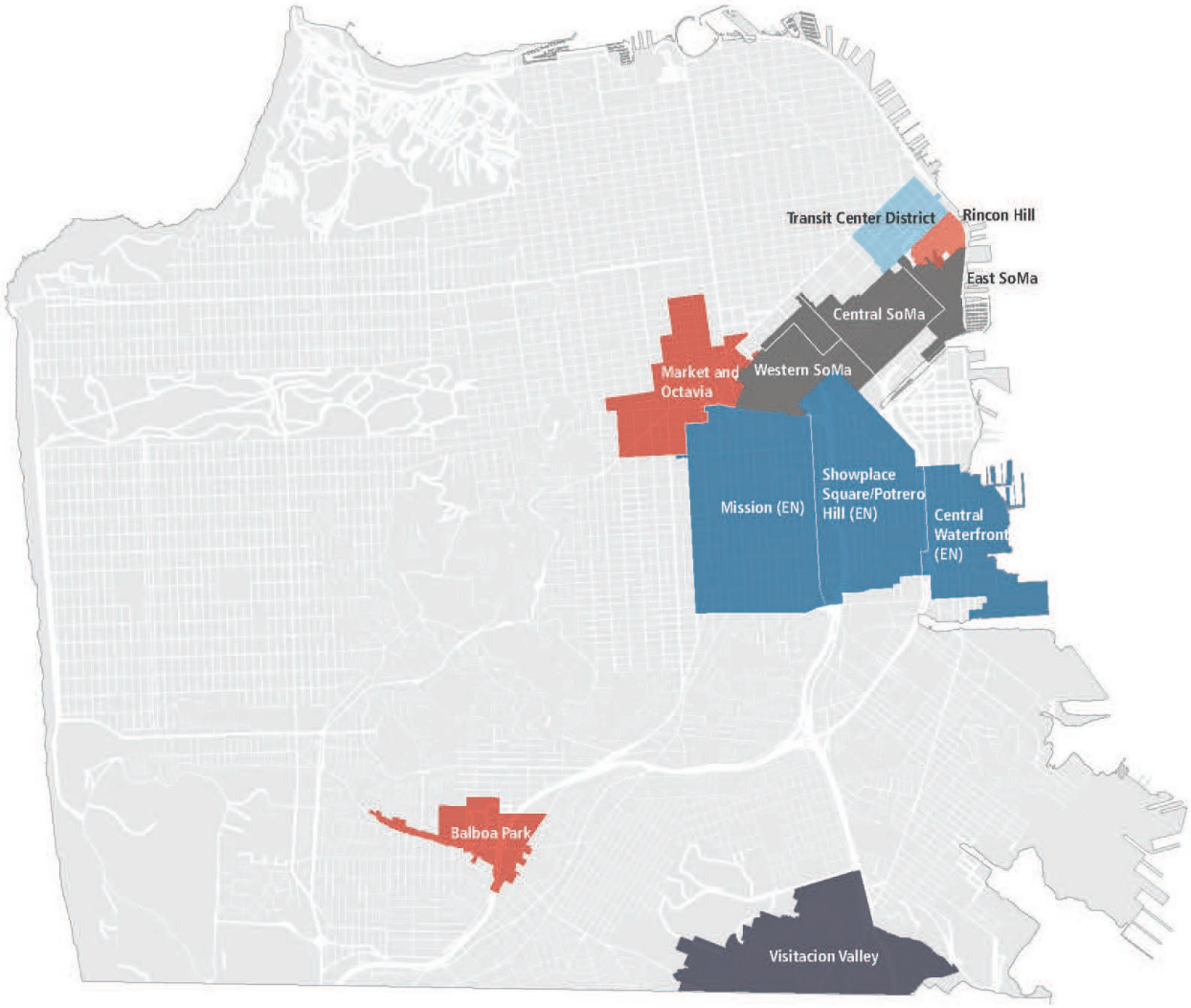
- A reasonable relationship between the **need** for particular infrastructure and the type of development paying the fee; and
- A reasonable relationship between the amount of the fee and the **proportion** of the cost specifically attributed to development.

1.2.1 Existing Development Impact Fees

Table 1 catalogues San Francisco's current impact fees in San Francisco for the infrastructure components studied in this report (recreational and open space, child care, complete streets, and transit infrastructure). Fire department infrastructure and libraries do not currently have impact fees in San Francisco, but are also studied in this report.

Fees in San Francisco typically fit into one of two categories: citywide fees that usually address a single improvement type, and geographically-based Area Plan fees where a single fee usually includes multiple improvement types. Any development that is subject to impact fees must pay the fees for any Area Plan within which it is located (infrastructure categories in which Area Plan-based impact fees can be spent sometimes overlap, and certain parts of the City do not have any Area Plan fees), in addition to citywide fees. Figure 1 shows the location of Area Plan fee areas across the City. Note that in areas where the geographically-based Area Plan fee includes a child care component, the citywide child care fee is reduced proportionally.

FIGURE 1: MAP OF AREA PLAN FEE AREAS[1]



In Table 1, single-issue fees for any of the relevant infrastructure items are reported, and fees with multiple improvement types are apportioned by infrastructure item.[2] At the bottom, Table 1 displays the maximum total fee charged in each infrastructure category. For certain infrastructure categories, multiple fees may be charged. In these cases, Table 1 highlights the fees that combine to form the maximum possible fee.

[1] This map of area plan fee areas was provided by Mat Snyder, SF Planning staff, on January 14, 2021.
[2] Apportionment of community infrastructure fees was provided by Mat Snyder, SF Planning staff, on December 6th, 2019.

TABLE 1: EXISTING RELATED IMPACT FEES IN SAN FRANCISCO (2019)[3]

Fee Area	Recreational and Open Space	Child Care	Complete Streets	Transit	Total Impact Fee
Residential Fees ($/GSF)					
Child Care: Citywide	-	$2.15	-	-	**$2.15**
Transit Center - Transportation[4]	-	-	$5.00	$9.00	**$14.00**
Transit Center - Open Space	$3.38	-	-	-	**$3.38**
Transportation Sustainability Fee	-	-	$0.32	$9.98	**$10.29**
Balboa Park	$3.66	$1.89	$4.80	$1.64	**$12.00**
Eastern Neighborhoods	$12.00	$1.64	$7.83	$2.53	**$24.00**
Market/Octavia	$2.98	$1.14	$6.25	$3.12	**$13.49**
Market/Van Ness SUD	$5.00	$2.01	$10.48	$5.00	**$22.49**
Rincon Hill	$2.17	-	$10.73	-	**$12.90**
Visitacion Valley	$2.27	$1.51	$3.09	-	**$6.87**
Central SoMa - Infrastructure[5]	$10.47	-	-	$9.53	**$20.00**
Maximum Fee	**$22.47**	**$2.15**	**$17.04**	**$22.04**	-
Commercial Fees ($/GSF)					
Child Care: Citywide	-	$1.85	-	-	**$1.85**
Downtown Park Fee	$3.00	-	-	-	**$3.00**
Union Square Park Fee	$6.00	-	-	-	**$6.00**
Transit Center - Transportation[4]	-	-	$11.00	$21.00	**$32.00**
Transit Center - Open Space	$12.00	-	-	-	**$12.00**
Transportation Sustainability Fee	-	-	$0.74	$23.30	**$24.04**
Balboa Park	$0.69	$0.36	$0.90	$0.31	**$2.25**
Eastern Neighborhoods	$1.33	$0.44	$7.52	$11.72	**$21.00**

[3] The cells highlighted in yellow show fees that combine to form the maximum possible fee. Source: San Francisco Citywide Development Impact Fee Register, January 1, 2019, and the San Francisco Planning Department. The City annually adjusts all development impact fees using an Annual Infrastructure Construction Cost Inflation estimate (AICCIE), as per Article 4 of the Planning Code. Although this report is being published in 2021, the substantive fee calculations were performed in 2019, so the body of this report lists all fees at their 2019 rates. The addendum at the end inflates the fees to their 2021 values.

[4] The Transit Center – Transportation fee increases as a building's Floor Area Ratio (FAR) increases. The fee amounts listed here are based on an FAR of 32.75, rounded up to the nearest dollar. The 32.75 FAR was provided by Planning as the largest FAR planned for the area to which the fee applies.

[5] Pursuant to Planning Code section 431 et seq. the Central SoMa Infrastructure fee may be used for public transit, recreation, and open space improvements. In Ordinance No. 47-21, the Board of Supervisors amended Section 433.4 to clarify that the permissible uses of the Central SoMa Infrastructure fee includes recreation and open space infrastructure projects, as envisioned by the Central SoMa Implementation Strategy. Therefore, the Central SoMa Infrastructure Fee is apportioned as shown here. For additional detail, refer to the 'Note-to-File: Distribution of Funds Collected from the Central SoMa Infrastructure Fee' from SF Planning included in section 10.3 of the Appendix.

Market/Octavia	$0.75	-	$3.27	$1.07	**$5.10**
Market/Van Ness SUD	$4.73	-	$7.10	$10.65	**$22.49**
Rincon Hill	$2.17	-	$10.73	-	**$12.90**
Visitacion Valley	$2.27	$1.51	$3.09	-	**$6.87**
Central SoMa - Infrastructure	-	-	-	$41.50	**$41.50**
Maximum Fee	**$15.00**	**$1.85**	**$11.74**	**$76.52**	-

1.2.2 Nexus Methodology

The nexus analysis establishes the relationship between new development and the increased demand for certain categories of infrastructure needed to serve the new development. Impact fees can be calculated several ways, but the foundation of all methodologies is determining an appropriate level of infrastructure for future development, the cost to provide this infrastructure, and a reasonable relationship between growth and cost, by which to apportion the cost burden.

With the exception of child care, this study uses a Level Of Service (LOS) based approach to derive a maximum supportable fee. For the Recreational and Open Space, Complete Streets, Transit, Libraries, and Fire Department infrastructure categories, the infrastructure LOS is determined based on current provision of an infrastructure type relative to each resident or service population unit (SPU). An explanation of service population is provided in the next section. A per-unit provision standard is established by the City – for example, a certain number of acres of open space per SPU – and subsequent development may be required to fund the maintenance of that standard (i.e., development may be charged the cost of maintaining that standard for the new residents or service population units it will draw). The nexus represents the maximum fee that could potentially be charged to new development based on that development's share of the cost to provide this level of service. As long as the standard is not above the existing LOS conditions (i.e., as long as the existing LOS is not deficient per the standard), new development may bear the full burden of providing the LOS associated with its development. The City, however, may choose to adopt a lower fee than the maximum determined in this study.

The *2021 San Francisco Infrastructure Level of Service Analysis* report sets the foundation for the nexus analysis, by exploring various metrics and LOS standards for select infrastructure items, and by providing a comprehensive study of San Francisco's infrastructure elements, current LOS provision, long-term aspirations, and short-term infrastructure LOS targets. The short-term targets are the standards used for the nexus analysis. These standards were developed through a review of existing City policies, interviews with City departments, and research on best practices.

The child care fee uses a linkage approach to the nexus analysis. This approach does not consider the current LOS, but rather charges new development for the cost of meeting the new demand created by that development. For more information on the linkage methodology, including a discussion on the usage of the linkage methodology, see the Child Care Facilities section.

1.2.3 Service Population

Three of the included nexus analyses (recreational and open space, complete streets, and fire department facilities) rely on the "service population" concept for their LOS. Service population is a relatively standardized concept, which determines the level of capital infrastructure demand placed on given infrastructure by additional development, including both residents and employees. Service population can be estimated either at a building level, by estimating the typical population and/or worker density of the building use, or at a citywide level. For the purposes of this study, the city's total service population is calculated as one times the resident population plus half of the employment population (1:0.5 ratio). This discounting represents an

industry standard discount factor for employees in service population calculations.[6]

This methodology accounts for the infrastructure need generated both at an individual's place of work and at their place of residence (e.g. required parks and sidewalks near their homes and near their offices). While employees require similar capital improvements (e.g., parks and sidewalks) as residents, the employee factor has been discounted (to 0.5) to reflect a conservative approach to employee capital infrastructure demand. This 1:0.5 ratio serves as the basis for the service population calculations.

1.3 Infrastructure Categories

A nexus between development and maximum supportable impact fees has been determined for the following infrastructure types:

- Recreational and Open Space
- Child Care
- Complete Streets
- Transit
- Libraries
- Fire Department

The first four infrastructure elements (recreational and open space, child care, complete streets, and transit) represent infrastructure categories where existing impact fees are charged. The last two elements (libraries and fire department facilities) represent infrastructure categories where the City does not have existing impact fees.

1.3.1 Citywide Approach to Impact Fees

Although many existing impact fees result from the City's planning processes in various Area Plans, and thus are neighborhood-specific, this nexus study is conducted at a citywide level, and where relevant accounts for the various neighborhood specific fees. While the implementation of fee programs may vary based on specific considerations of individual Area Plans, a citywide nexus model provides a consistent nexus architecture that affords the City an over-arching structure and a program that can easily be administered and updated (with revised cost and demographic inputs) on a five-year basis.

1.3.2 Infrastructure Metrics and Target Years

For each infrastructure element, the metrics and the target year are shown in Table 2. Each infrastructure category is based on demographic projections through 2025, the year of the "short-term target" in the *2021 San Francisco Infrastructure Level of Service Analysis* report, except Transit, which uses the year 2040.

TABLE 2: LOS METRICS FOR INFRASTRUCTURE CATEGORIES[7]

Infrastructure Element	Metric	Target Level of Service	Target Year for Nexus Evaluation
Recreational and Open Space	City-owned open space per 1,000 service population units	3 acres	2025
Child Care	Child care demand created by new development	100% of demand created by new	2025

[6] For further information, see the *2021 San Francisco Infrastructure Level of Service Analysis* report.
[7] Source: *2021 San Francisco Infrastructure Level of Service Analysis* report

		development	
Complete Streets	Square feet of Complete Streets Sidewalk[8] per 1,000 service population units	118 square feet	2025
Transit	Revenue service hours per average daily vehicle (transit & auto) trip	1.45 hours	2040
	Share of total daily transit passenger miles in crowded conditions	15%	2040
Libraries	Square feet of library space per resident	0.6 square feet	2025
Fire Department Facilities	Fire department facilities[9] per 1,000 service population units	0.034 fire department facilities	2025

1.3.3 Growth Projections

This nexus analysis contains projections and estimates of employment and population growth within San Francisco through 2025 and 2040. The 2025 estimates, which are used in the maximum supportable fee calculations, are intended to reflect a typical five-year period of City growth based on the long-term 2040 population and employment estimates. The forecasts are based on reasonable assumptions for population and employment growth, but the actual population and employment growth may vary. While the nexus analysis is based on projected population and employment growth, those projections are used to calculate impact fees on a per-square-foot basis. Differences between the projected and actual population and employment growth may result in proportional changes to the amount of fees collected. Regardless of projected population and employment growth, the impact fees charged will be proportional to actual new development to ensure development pays its share for needed infrastructure improvements, and the services delivered will be proportional as well.

The nexus analysis is predicated on a demographic forecast that helps determine the need for future infrastructure. The following population and employment projections from 2019 through 2040 (Table 3) were provided by the City. The projections below are consistently applied throughout the nexus analysis because as new residential and non-residential development occurs, it brings an increased demand for new (or expanded and improved) community infrastructure.

[8] See definition of Complete Streets Sidewalk in Section 4.2.1.

[9] Fire department facilities consist of fire houses, department vehicles, an ambulance deployment center. For more information, see Table 39.

TABLE 3: POPULATION AND EMPLOYMENT PROJECTIONS FOR SAN FRANCISCO (2019 – 2040)[10]

Year	2019	2025	2040
Population			
Total Residents	908,336	981,920	1,169,485
Employment			
Jobs	768,360	823,505	872,510

1.3.4 Additional Assumptions

In addition to the population and employment projections presented above, there are a number of other assumptions that are applied in the nexus analysis for each infrastructure category. For example, this nexus analysis ascribed demand for infrastructure on a gross square footage (GSF) basis that is consistent with current density assumptions (residents or employees per GSF). These assumptions are summarized in Table 4.

TABLE 4: GENERAL NEXUS ASSUMPTIONS

*	Measure	Value	Source/Calculation
Residential Assumptions			
A	Residents per service population unit	1	*2021 San Francisco Infrastructure Level of Service Analysis*
B	Residents per housing unit	2.26	Demographic data from San Francisco Planning Department (2019)
C	GSF per average residential housing unit (new construction)	1,000	New Construction Average Housing Unit Size Memorandum (2020)
D	GSF per residential service population	443	C / B
Commercial Assumptions			
E	Employees per service population unit	0.5	*2021 San Francisco Infrastructure Level of Service Analysis*
F	GSF commercial space per employee	310	Table 44
G	GSF per commercial service population	620	G / E

1.3.4.1 Administrative Costs

For each fee calculation, five percent of the calculated cost is added to cover administrative services, as directed by the San Francisco Planning Department, which oversees the fee calculation. Five percent reflects the average administrative cost across all citywide and neighborhood impact fees.[11] This is consistent with the *2014 San Francisco Citywide Nexus Analysis.*

[10] Source: San Francisco Planning Department. Projections included number of households and jobs, in addition to a total population estimate for 2040. The Hatch team used the projected number of households in 2025, along with the average household size in 2019 and 2040, to estimate the total population in 2025.

[11] The San Francisco Planning Department verified that five percent is the average administrative cost for impact fees in an email from Mathew Snyder on September 4th, 2019.

1.3.4.2 Gross Square Feet

Consistent with current City practices, all fees are presented in terms of infrastructure cost ($) relative to gross square foot (GSF) of new development. For neighborhoods that have a considerably lower or higher number of GSF per residential housing unit than assumed in Table 4, the Planning Department reserves the right to recalculate fees for the relevant geographically-based Area Plan fees based on adjusted assumptions.

1.4 Summary of Citywide Impact Fees

The impact fees determined in this nexus analysis are tabulated below (Table 5).

TABLE 5: MAXIMUM SUPPORTABLE CITYWIDE IMPACT FEES PER GSF (2019)

Citywide Nexus Fees	Maximum Supportable Fee
Recreational and Open Space	
Residential ($/GSF)	$46.22
Non-Residential ($/GSF)	$33.05
Child Care	
Residential ($/GSF)	$2.47
Non-Residential ($/GSF)	$4.86
Complete Streets: Citywide	
Residential ($/GSF)	$16.19
Non-Residential ($/GSF)	$11.58
Complete Streets: Downtown	
Downtown Area: Residential ($/GSF)	$19.42
Downtown Area: Non-Residential ($/GSF)	$13.89
Transit	
Residential ($/GSF)	$24.24
Production, Distribution, and Repair (PDR) ($/GSF)	$46.82
Non-Residential (ex. PDR) ($/GSF)	$83.75
Libraries	
Residential ($/GSF)	$2.50
Non-Residential ($/GSF)	N/A
Fire Department Facilities	
Residential ($/GSF)	$1.51
Non-Residential ($/GSF)	$1.08

1.4.1 Comparison of Maximum Supportable Impact Fees with Existing Impact Fees

The maximum supportable citywide impact fees exceed the existing impact fees, including Area Plan fees, in every category. Additionally, the maximum supportable citywide impact fees exceed the existing impact fees by at least 10 percent, as shown in Table 6. Note that both existing and maximum supportable impact fees are expressed in $/GSF.

TABLE 6: COMPARING MAXIMUM SUPPORTABLE CITYWIDE FEES TO EXISTING FEES (2019)

	Maximum Supportable Fee (determined by this Nexus)	Highest Existing Fee (2019 fee rates)	Percent of Existing Fee Covered by Maximum Supportable Nexus (Maximum/Existing)
Recreational and Open Space			
Residential ($/GSF)	$46.22	$22.47[12]	206%
Non-Residential ($/GSF)	$33.05	$15.00	220%
Child Care			
Residential ($/GSF)	$2.47	$2.15	115%
Non-Residential ($/GSF)	$4.86	$1.85	263%
Complete Streets: Non-Downtown			
Residential ($/GSF)	$16.19	$8.15	199%
Non-Residential ($/GSF)	$11.58	$8.25	140%
Complete Streets: Downtown			
Residential ($/GSF)	$19.42	$17.04	114%
Non-Residential ($/GSF)	$13.89	$11.74	118%
Transit			
Residential ($/GSF)	$24.24	$22.04[12]	110%
PDR ($/GSF)	$46.82	$9.45	495%
Non-Residential (ex. PDR) ($/GSF)	$83.75	$76.52	110%
Libraries			
Residential ($/GSF)	$2.50	N/A	N/A
Non-Residential ($/GSF)	N/A	N/A	N/A
Fire Department Facilities			
Residential ($/GSF)	$1.51	N/A	N/A
Non-Residential ($/GSF)	$1.08	N/A	N/A

2 Recreational and Open Space

This chapter summarizes the nexus analysis for recreation and open space. After providing a brief background, this chapter will outline the relevant growth assumptions, the LOS standard developed in the associated *2021 San Francisco Infrastructure Level of Service Analysis*, the methodology used to determine the maximum supportable impact fee, and the final determination of the maximum supportable impact fee.

[12] Note: Pursuant to Planning Code section 431 et seq. the Central SoMa Infrastructure fee may be used for public transit, recreation, and open space improvements. In Ordinance No. 47-21, the Board of Supervisors amended Section 433.4 to clarify that the permissible uses of the Central SoMa Infrastructure fee include recreation and open space infrastructure projects, as envisioned by the Central SoMa Implementation Strategy. As stated in section 10.3 of the Appendix in the 'Note-to-File: Distribution of Funds Collected from the Central SoMa Infrastructure Fee', of the $20 Residential Central SoMa Infrastructure fee for Tier B projects (in 2019 dollars) no more than $9.53 would go toward transit, leaving at least $10.47 to go toward Recreation and Open Space.

2.1 Introduction

2.1.1 Recreational and Open Space Background

Recreational and open space is a common, City-provided, public amenity. San Francisco, like most cities, aims to provide adequate quality open space for the public health and quality of life of its citizens and workforce. As new residential and non-residential development occurs, it brings an increased demand for new (or expanded and enhanced) open space. This relationship between new development, an influx of residents and workers, and a demand for open space provides the nexus for an impact fee.

In addition to serving the residential population, the City has a longstanding commercial development impact fee, the Downtown Park Fee, initiated in 1985, which supports recreation space in the Downtown area for the neighborhood's daytime employee population.[13] In adopting the Downtown Park Fee, the Board of Supervisors recognized that continued office development in the Downtown area increases the daytime population and creates a need for additional public park and recreation facilities in the Downtown. The Board recognized at the time that, while the open space requirements imposed on individual office and retail developments through the Planning Code addressed the need for plazas and other local outdoor sitting areas to serve employees and visitors in the district, such open space could not provide the same recreational opportunities as a public park. The City thus created the Downtown Park fund in order to provide the City and County of San Francisco with the financial resources to acquire and develop public park and recreation facilities necessary to serve the burgeoning daytime population in the Downtown area. The City continued its commitment to ensuring that recreational and open space facilities increased apace with new commercial development when it adopted open space fees on commercial development as a part of various Area Plans such as Market/Octavia, Eastern Neighborhoods, Balboa Park and Visitacion Valley (Table 1).

Providing recreational and open space – such as baseball diamonds, soccer fields, parks, playgrounds, tennis courts, flower gardens, community gardens, and greenways – is a capital-intensive undertaking, especially in San Francisco where land availability is low and land prices are high. Recreational and open space fees, charged to new development, are collected to fund the acquisition and construction of new or expanded recreation capacity for the additional residents and workers directly attributable to new development.

Note that the terms "park space" and "open space" may be used in this chapter as shorthand to denote any and all recreational and open space.

2.1.2 Purpose and Use of Revenues

The primary purpose of the recreational and open space development impact fee revenue is to fund expansion of San Francisco's park capacity to meet the demand from new development. Recreational and open space capacity can be increased either through the acquisition and construction of new park land, or through capacity enhancements to existing open space. Both types of open space investments increase the capacity of San Francisco's open space network to accommodate new development. Examples of how development impact fees would be used include:

- Acquisition and construction of new park and recreation land;
- Lighting improvements to existing parks, which extend hours of operation on play fields and allow for greater capacity;
- Recreation center construction, or adding capacity to existing facilities; and

[13] Planning Code Section 412. http://www.amlegal.com/nxt/gateway.dll/California/planning/article4developmentimpactfeesandprojectr?f=templates$fn=default.htm$3.0$vid=amlegal:sanfrancisco_ca$anc=JD_412

- Converting passive open space[14] to active open space[15] through addition of trails, play fields, playgrounds, etc.

The recreational and open space impact fee aims to ensure that new development contributes its fair share of funding to recreation and open space. Because the LOS metric upon which the nexus is developed directly ties infrastructure to the service population, there is a clear relationship between new development, which increases housing and employment space, and an increase in demand for recreation capacity.

As with all impact fees, the fee may not be used to address existing infrastructure deficiencies, and as such, no portion of the funds will be used for SFRPD's deferred maintenance tasks. Unlike capacity enhancements that make the open space usable by more people, deferred maintenance efforts simply restore open space to its initial capacity. For example, as noted above, a park enhancement might be adding lighting to a tennis court, which extends the effective hours of operation of the tennis court, allowing more people to use the court. By contrast, reflooring a tennis court as part of a maintenance effort simply maintains the tennis court's capacity, and thus would not be a permitted use of funds in the development impact fee context.

This nexus analysis examines how much would have to be charged to new development to satisfy 100 percent of the development-based demand for open space. This study estimates the maximum supportable fee based on the relationship between the cost to provide open space and the LOS provision to accommodate new development. However, the City may choose to adopt a lower fee as appropriate.

2.2 Nexus Determination

The maximum supportable fee calculation for recreation and open space infrastructure combines the proposed recreation and open space LOS metric with residential and job growth projections and the cost to provide recreation and open space.

2.2.1 LOS Metric

Although recreational and open space infrastructure comprises a wide range of components, from playgrounds, lawn areas, and recreation centers to baseball diamonds and forested areas, the LOS metric put forth in the *2021 San Francisco Infrastructure Level of Service Analysis* – acres of open space per service population unit – encompasses, undifferentiated, all types of park-related improvements.

As noted in the *2021 San Francisco Infrastructure Level of Service Analysis*, the City currently provides 3 acres of open space per 1,000 service population units, and aims to maintain this provision into the future.[16] This metric assumes that for each new service population unit, the City will provide an equivalent level of service, whether it comes in the form of new open space or capacity improvements to existing open space (see Nexus Methodology & Fee Calculation section below for more detail).

2.2.2 Growth Projections

The horizon for projected growth in demand for recreational and open space is 2025. Between 2019 and 2025, San Francisco is projected to gain 73,584 more residents and 55,145 more jobs (Table 7). Note that, although

[14] Lawn or forested areas dedicated for "general enjoyment of outdoors," as per SFRPD's Parks Acquisition Policy (August 2011).
[15] Recreational space constructed to accommodate "team sports and athletics, children's play areas, courses and courts, bike, pedestrian and equestrian paths", as per SFRPD's Parks Acquisition Policy (August 2011).
[16] City-provided park land includes land owned or controlled by the Recreation and Parks Department, the Department of Public Works, the Port, the Municipal Transportation Agency, the Public Library, the Public Utilities Commission, the Office of Community Investment and Infrastructure, the Treasure Island Development Authority, and the Transbay Joint Powers Authority.

the development and fee collection is projected to occur between 2019 and 2025, infrastructure acquisition and development cannot occur until after fee collection, and may not be completed by 2025.

TABLE 7: GROWTH PROJECTIONS FOR RECREATIONAL AND OPEN SPACE (2019 - 2025)[17]

	2019	2025	Growth (2019 - 2025)	Percent Increase
Population				
Residents	908,336	981,920	73,584	8.1%
Employment				
Jobs	768,360	823,505	55,145	7.2%
Service Population Units (SPU)				
SPU[18]	1,292,516	1,393,673	101,157	7.8%

2.2.3 Nexus Methodology & Fee Calculation

The fee calculation methodology (Table 8) calculates the total cost of increasing open space acreage for the increase in service population (2019-2025), and distributes the cost between residential and non-residential land uses based on their associated contributions to total incremental service population growth. The residential fee is based on the percentage of service population units arising from the new resident population; the non-residential (commercial) fee is based on the percentage of service population units arising from the increase in employee population.

Note that, to maintain the LOS at 3 acres of open space per 1,000 service population units, an equivalent of 301 new acres of open space would need to be constructed (Table 8, Row G). Given the size of San Francisco, the building density, absolute land availability, and expensive land costs, constructing 301 new acres of open space within San Francisco by 2025 is infeasible. SFRPD and the Planning Department have determined that for purposes of this analysis, the City can reasonably acquire 1.6 new acres of open space within San Francisco by 2025.[19] The remaining 299 acres demanded by the LOS (301 minus 1.6, rounded) will be accommodated not through the construction of new park acres, but through the capacity improvement of existing acres, as described in Section 2.1.2. The capacity improvements on existing acres must add capacity to the existing land (refer to Purpose and Use of Revenues section above).

TABLE 8: NEXUS METHODOLOGY FOR RECREATIONAL AND OPEN SPACE FEE

*	Measure	Value	Source/Calculation
Service Population			
A.1	Current residential population (2019)	908,339	Table 7
A.2	Projected residential population growth (2019-2025)	73,584	Table 7
B.1	Current service population (2019)	1,292,516	Table 7
B.2	Projected service population growth (2019-2025)	101,157	Table 7
Unit Conversions			
C	GSF of residential development per SPU	443	Table 4

[17] Based on population projections from Table 3.
[18] Equal to the number of residents plus half the number of jobs (number of residents + 0.5 * number of jobs).
[19] This determination was made based on open space acquisition over the past 10 years through the Interagency Plan Implementation Committee, and includes a discount for open space that may be acquired through other funding sources.

D	GSF of commercial development per SPU	620[20]	Table 4
Metric			
E	Total acres of open space (all City owners, 2019)	3,844	SFRPD
F	Acres of park improvements per 1,000 Service Population Units	3.0	*2021 San Francisco Infrastructure Level of Service Analysis*
Cost			
G	Incremental acres of open space required to maintain LOS (2019-2025)	301	(B.2 / 1,000) * F
H	Feasible new acres of open space (2019-2025)	1.6	Historical acquisitions, from SF Planning
I	Acres of open space to be improved[21]	299	G - H
J	City estimate of unit acquisition cost ($/acre of open space acquired)	$5,267,880	Historical acquisition prices from SFRPD
K	City estimate of unit improvement cost ($/acre of open space improved)	$6,534,000	Email from Stacy Bradley, SFRPD staff, 11/21/2019
L	Total cost for new open space	$19,219,508	H * (J + K)
M	Total Cost for improved open space	$1,955,073,503	I * K
N	Cost attributable to incremental growth	$1,974,293,011	L + M
O	Administrative costs (5% of fee)	$98,714,651	SF Planning
P	Total attributable cost with administrative costs	$2,073,007,662	N + O
Maximum Supportable Impact Fees			
Residential ($/GSF)		**$46.22**	P / (B.2 * C)
Non-Residential ($/GSF)		**$33.05**	P / (B.2 * D)

2.3 Nexus Findings

Based on the approach in Table 8, the maximum estimated cost of providing recreational and open space is $46.22 per gross square foot of residential development, and $33.05 per gross square foot of non-residential development.

As Table 9 demonstrates, both determined maximum supportable fees are more than 10 percent above the highest existing fee for recreation and open space.

[20] Note that the number of square feet per service population unit, as defined in Table 4, takes into account the 0.5 employees per service population unit ratio for purposes of determining the maximum fee.
[21] See explanation of improvement that expands capacity in Section 2.1.2.

TABLE 9: COMPARING PROPOSED MAXIMUM SUPPORTABLE RECREATION AND OPEN SPACE FEES TO EXISTING (2019) FEES

	Proposed (Max)	Existing (Max)	Percent of Existing Fee Covered by Maximum Supportable Nexus (Maximum/Existing)	Proposed Max > 10% Above Existing
Residential ($/GSF)	$46.22	$22.47[22]	206%	YES
Non-Residential ($/GSF)	$33.05	$15.00	220%	YES

3 Child Care Facilities

This chapter summarizes the nexus analysis for child care infrastructure. After providing a brief background, this chapter will outline the relevant growth assumptions, the LOS standard developed in the associated *2021 San Francisco Infrastructure Level of Service Analysis*, the methodology used to determine the maximum supportable impact fee, and the final determination of the maximum supportable impact fee.

3.1 Introduction

3.1.1 Child Care Facilities Background

For families with children – especially those with children under the age of thirteen – child care is a key concern. In San Francisco, with high housing costs, many families have working parents and, therefore, require non-parent child care. The City has long recognized the importance of child care as a community-serving amenity, and first adopted a child care inclusionary zoning ordinance with an in-lieu fee option for certain non-residential uses in 1985.[23] The child care fee was expanded to include residential development in 2016.[24] In addition to the City's child care ordinance, there are four Plan Areas with Community Infrastructure Impact Fees that include a child care component – Market/Octavia, the Eastern Neighborhoods, Visitacion Valley, and Balboa Park. These fees are used to help provide facilities for child care demand resulting from new commercial and residential developments.

As new non-residential and residential development occurs, it attracts new residents and employees, some of whom have children who require non-parent child care. There is a relationship, or nexus, between new development, an influx of residents and workers, and a demand for child care facilities. The nexus provides a theoretical maximum for the impact fee. While child care is not a mandated public service, the City is involved in supporting the provision of licensed child care options by helping to fund capital projects that create new child care slots in the City.

3.1.2 Purpose and Use of Revenues

The primary purpose of the child care development impact fee is to fund expansion of San Francisco's child care capacity to meet the demand from new development. That is, impact fee revenues are intended to be used to mitigate the child care demands of the increasing population. Monies from the child care impact fee may only be used to fund capital child care projects and facilities.

[22] Note: The permissible uses of the Central SoMa Infrastructure fee includes recreation and open space infrastructure projects, as envisioned by the Central SoMa Implementation Strategy. As noted in Table 1 of this report, the highest existing fee for recreation and open space includes $10.47 of the $20 Residential Central SoMa Infrastructure fee for Tier B projects (in 2019 dollars).

[23] The original ordinance (Ord. 411-85, App. 9/6/82) only applied to hotel and office development. See Section 414 of the City Planning Code for more information.

[24] Ordinance 002-16, enacted on 1/19/2016.

This nexus is limited to new demand for infants, toddlers, and preschool-age child care only. The nexus does not address the child care needs of school-age children (ages 5 to 17). Although there is a need for additional school-age child care capacity in the City, those needs tend to be for operations assistance, not for additional facilities. After-school care is typically provided at existing school sites, using school facilities. Given that impact fee revenues must be spent on capital costs to maintain or increase the supply of facilities, expanding such operational assistance would not be an appropriate use of nexus funds. At this time, the City does not intend to assist in the creation of new facilities providing after-school care; instead, the City intends to use other funding sources to assist the operation of after-school programs.[25]

This study estimates the maximum supportable fee based on the relationship between new development and the costs to provide additional child care and the demand created by new development. However, the City may choose to adopt a lower fee as appropriate.

3.2 Nexus Determination

The maximum supportable fee calculation for child care combines the child care demand estimation with residential and employment growth projections and the cost to provide licensed child care.

3.2.1 Linkage Analysis

The child care fee uses a linkage approach to the nexus analysis. A linkage analysis for the nexus determination addresses the indirect social impacts caused by the addition of residents and businesses associated with new development, as compared to the direct public facility impacts addressed by traditional development fees.[26] Indirect impacts typically addressed by a linkage analysis include the additional affordable housing and expanded licensed child care required to accommodate new development. Whereas local agencies use revenue from traditional impact fees to expand public facilities, they use linkage fee revenue to incentivize the expansion of social services such as housing and child care. Although linkage fees were novel in the 1980s, professional practice now deems that "there are no fundamental differences between linkage and impact fees" other than the types of services and facilities funded by each.[27] The nexus analysis for both types of fees relies on an estimate of demand for services and facilities generated by new development, the available supply of those services and facilities, and new development's proportionate share of the expansion of those services and facilities.

Although the most common type of linkage fee is the affordable housing linkage fee on nonresidential development, several cities impose linkage fees for child care facilities. The City of Palm Desert imposes a child care linkage fee on nonresidential development only while the cities of Santa Monica and South San Francisco impose the fee on both residential and nonresidential development. In a similar manner, the child care linkage approach to the San Francisco nexus analysis demonstrates that new development brings an increased demand for expanded child care facilities to provide non-parent child care for families in new development. The City does not directly provide these facilities but provides financial incentives for construction and operation of child care slots to serve low-income families. As demonstrated in the *2021 San Francisco Infrastructure Level of Service Analysis*, current licensed child care facilities meet 19 percent of infant/toddler care demand and 88 percent of preschool demand. The lack of sufficient capacity to meet existing demand demonstrates the need for new development to fund additional child care capacity.

[25] *San Francisco Early Care and Education Needs Assessment*, 2017.
[26] William W. Abbott, et al., *Exactions and Impact Fee in California*, Solano Press Books, 2012, pp. 26-27.
[27] Ibid. See also Nelson, Arthur C., James C. Nicholas, and Julian C. Juergensmeyer, *Impact Fees: Principals and Practice of Proportional-Share Development Fees*, Routledge, 2019, p.107.

3.2.2 Growth Projections

The horizon for projected growth in demand for child care infrastructure is 2025. Unlike other infrastructure categories, which are required by residents and employees at multiple locations (both at home and at work), child care facilities are required in only one location per child in need of care. As a result, a service population-based nexus (like recreational and open space) is not relevant to child care. Instead, the child care nexus is based on future child care demand estimates. Between 2019 and 2025, new development in San Francisco is projected to generate demand for 486 new licensed infant and toddler child care slots and 1,119 new licensed preschooler child care slots.[28] Note that, although the development and fee collection is projected to occur between 2019 and 2025, infrastructure acquisition and development cannot occur until after fee collection, and may not be completed by 2025.

TABLE 10: GROWTH PROJECTIONS AND DEMAND ESTIMATES FOR CHILD CARE (2019 – 2025)

	2019	2025	Growth (2019 - 2025)	Percent Increase
Population				
Residents	908,336	981,920	73,584	8.1%
Resident Children	48,377	52,296	3,919	8.1%
Employment				
Jobs[29]	768,360	823,505	55,145	7.2%
Jobs Held by Non-Residents	463,040	496,272	33,232	7.2%
Children of Non-Resident Employees Seeking Care	23,152	24,814	1,662	7.2%
Child Care Demand Estimates (for Licensed Care)				
Resident Children Aged 0-2 Requiring Care	5,999	6,485	486	8.1%
Resident Children Aged 3-5 Requiring Care	13,813	14,932	1,119	8.1%
Non-Resident Children Aged 0-5 Requiring Care	23,152	24,814	1,662	7.2%

3.2.3 Nexus Methodology & Fee Calculation

The child care nexus analysis seeks to estimate the cost to the City of meeting new demand for child care in San Francisco as the demand for child care grows over time (as population and employment grows), and to assign this cost to residential and non-residential construction on a per-square foot basis. It then calculates the capital costs required to provide these child care spaces to accommodate the new population, based on the City's cost of funding new child care facilities. Lastly, the costs are assigned to new housing units and new non-residential development on a per-square-foot basis.

The residential child care fee is calculated to account for children of all San Francisco residents who work within the City, including those San Francisco residents who work within the City and seek child care near their place of work. This is because the childcare nexus evaluates childcare demand on a citywide basis, and not by

[28] See the *2021 San Francisco Infrastructure Level of Service Analysis* for a detailed explanation of the child care demand calculations and assumptions. The methodology is summarized in Appendix Section **Error! Reference source not found.**.

[29] The child care demand methodology and calculations, summarized in Table 11, Table 12, and Table 13, assumes that 5 percent of non-resident workers coming in to the City will seek licensed care for a child in the City. This is based on the 2014 San Francisco Nexus Study methodology.

discrete neighborhoods. Thus, residential development creates the citywide need for child care to serve children of resident workers, regardless of the location of the parents' employment within San Francisco. The commercial child care fee does not include any demand from resident children in order to avoid double-counting.

TABLE 11: NEXUS METHODOLOGY FOR RESIDENT INFANT AND TODDLER (0-2) CHILD CARE FEE

Step	Description	Value	Source/Calculation
Total Resident-Children (0-2)			
1	Residents	908,336	SF Planning Estimates
1A	Resident children 5 and under	48,377	SF Planning Estimates[30]
1B	Percent of resident children 5 and under who are between 0-2	54%	2017 ACS 5-Year Estimates, B09001
1C	Resident children 0-2	26,124	1A * 1B
Resident-Children (0-2) Needing Care			
1D	Percent of resident children 0-2 in working households	71%	2017 ACS 5-Year Estimates, B23008
1E	Number of resident children 0-2 in working households	18,637	1C * 1D
Resident-Children (0-2) Needing Licensed Care Outside of San Francisco			
1F	Percent of SF Residents who are employed	58%	Total Employed SF Residents (504,914) (source: 2017 ACS 5-Year Estimates, DP03) divided by Total SF Residents (864,263) (source: 2017 ACS 5-Year Estimates, S0101)
1G	Employed SF Residents	530,662	1 * 1F
1H	Percent of Employed Residents working outside SF	24%	2017 ACS 5-Year Estimates, S0801
1I	Employed SF Residents working outside SF	125,767	1G * 1H
1J	Percent of Workers who seek child care where they work rather than where they live	5%	2014 San Francisco Nexus Study[31]
1K	Resident children (all 0-5) needing child care outside SF (assumes one child per working adult)	6,288	1I * 1J
1L	Resident children (0-2) needing child care outside SF	3,396	1B * 1K
Resident-Children (0-2) Needing Licensed Care in San Francisco			
1M	Remaining resident children (0-2) potentially	22,728	1C – 1L

[30] The number of children in each age group (i.e., 0-2, 3-4, 5) from the 2017 ACS 5-Year Estimates, B09001 was apportioned to the total SF resident population to determine the number of resident children in each age group.
[31] Based on the 2014 San Francisco Nexus Study, South San Francisco Child Care Facilities Impact Fee Nexus Study and surveys of corporate employees and other child care studies, reviewed by Brion & Associates, including Santa Monica's New Child Care Fee Nexus Study (as cited in Table 6 of Child Care Nexus Study for San Francisco by Brion & Associates); this study assumes one child needing care per employee).

	needing child care		
1N	Percent of young children in households with all working parents	71%	2017 ACS 5-Year Estimates, B23008
1O	Resident children (0-2) with working parents	16,215	1M * 1N
1P	Percent of children (0-2) with working parents needing licensed care	37%	2014 San Francisco Nexus Study[32]
1Q	Resident children (0-2) needing licensed care in SF	5,999	1O * 1P
Resident Children (0-2) Childcare Fee			
1R	Cost of child care slot	$50,000	Email from Graham Dobson, SFOECE Staff, September 17 2019
1S	Total cost of child care slots near residents	$299,972,268	1Q * 1R
1T	Child care slot cost per resident	$330.24	1S / "1"
1U	Resident per unit	2.26	Table 4: B
1V	Child care slot cost per unit	$746.35	1T * 1U
1W	Square feet per unit	1,000	Table 4: C
1X	Child care slot cost per square foot	$0.75	1V/ 1W

TABLE 12: NEXUS METHODOLOGY FOR RESIDENT PRESCHOOLER (3-5) CHILD CARE FEE

Step	Description	Value	Source/Calculation
Total Resident-Children (3-5)			
2	Residents	908,336	SF Planning Estimates
2A	Resident children 5 and under	48,377	SF Planning Estimates[33]
2B	Percent of resident children 5 and under who are aged 3-5	46%	2017 ACS 5-Year Estimates, B09001
2C	Resident children 3-5	22,253	A*B
Resident-Children (3-5) Needing Care			
2D	Percent of resident children 3-5 in working households	71%	2017 ACS 5-Year Estimates, B23008
2E	Number of resident children 3-5 in working households	15,876	2C * 1S
Resident-Children (3-5) Needing Licensed Care Outside of San Francisco			
2F	Percent of SF Residents who are employed	58%	Total Employed SF Residents (504,914) (source: 2017 ACS 5-Year Estimates, DP03) divided

[32] Based on the 2014 San Francisco Nexus Study, 37% of children (0-2) with working parents need licensed care (as cited in Table 7 of Child Care Nexus Study for San Francisco by Brion & Associates, which is based on a detailed review of 12 child care studies, including impact fee studies; demand factors developed in concert with Dept. of Human Services and DCYP). DCYP refers to the San Francisco Department of Children, Youth and Their Families (DCYF).

[33] The number of children in each age group (i.e., 0-2, 3-4, 5) from the 2017 ACS 5-Year Estimates, B09001 was apportioned to the total SF resident population to determine the number of resident children in each age group.

			by Total SF Residents (864,263) (source: 2017 ACS 5-Year Estimates, S0101)
2G	Employed SF Residents	530,662	2E * 2F
2H	Percent of Employed Residents working outside SF	24%	2017 ACS 5-Year Estimates, S0801
2I	Employed SF Residents working outside SF	125,767	2G * 2H
2J	Percent of Workers who seek child care where they work rather than where they live	5%	2014 San Francisco Nexus Study[34]
2K	Resident children (all 0-5) needing child care outside SF (assumes one child per working adult)	6,288	2I * 2J
2L	Resident children (0-5) needing child care outside SF	2,893	2B * 2K
Resident-Children (3-5) Needing Licensed Care in San Francisco			
2M	Remaining resident children (0-5) potentially needing child care	19,361	2C - 2L
2N	Percent of young children in households with all working parents	71%	2017 ACS 5-Year Estimates, B23008
2O	Resident children (3-5) with working parents	13,813	2M * 2N
2P	Percent of children (3-5) with working parents needing licensed care	100%	2014 San Francisco Nexus Study[35]
2Q	Resident children (3-5) needing licensed care in SF	13,813	2O * 2P
Resident Children (3-5) Childcare Fee			
2R	Cost of child care slot	$50,000	Email from Graham Dobson, SFOECE Staff, September 17 2019
2S	Total cost of child care slots near residents	$690,626,843	2Q * 2R
2T	Child care slot cost per resident	$760.32	2S / "2"
2U	Resident per unit	2.26	Table 4: B
2V	Child care slot cost per unit	$1,718.33	2T * 2U
2W	Square feet per unit	1,000	Table 4: C
2X	**Child care slot cost per square foot**	**$1.72**	**2V / 2W**

[34] Based on the 2014 San Francisco Nexus Study, South San Francisco Child Care Facilities Impact Fee Nexus Study and surveys of corporate employees and other child care studies, reviewed by Brion & Associates, including Santa Monica's New Child Care Fee Nexus Study (as cited in Table 6 of Child Care Nexus Study for San Francisco by Brion & Associates); assumes one child needing care per employee.

[35] Based on the 2014 San Francisco Nexus Study, 100% of children (3-5) with working parents need licensed care (as cited in Table 7 of Child Care Nexus Study for San Francisco by Brion & Associates, which is based on a detailed review of 12 child care studies, including impact fee studies; demand factors developed in concert with Dept. of Human Services and DCYP). DCYP refers to the San Francisco Department of Children, Youth and Their Families (DCYF).

TABLE 13: NEXUS METHODOLOGY FOR CHILDREN OF WORKERS (0-5) CHILD CARE FEE

Step	Description	Value	Source/Calculation
Non-Resident Children (0-5) Needing Licensed Care in San Francisco			
3A	SF Workers who live elsewhere	463,040	Percent of jobs filled by non-SF residents (60%) (source: LEHD 2015) * SF Jobs (2019) (768,360) (source: SF Planning)
3B	Percent of Workers who live elsewhere and seek child care in SF	5%	2014 San Francisco Nexus Study[36]
3C	Number of Workers who live elsewhere and seek child care in SF	23,152	3A * 3B
Non-Resident Children (0-5) Childcare Fee			
3D	Cost per child care slot	$50,000	Table 12 and 13: D
3E	Total cost of slots for workers who live outside SF	$1,157,600,000	3C * 3D
3F	Number of SF Workers	768,360	SF Planning
3G	GSF per worker	310	Table 4: F
3H	SF of commercial development	238,191,600	3F * 3G
3I	**Total Cost per SF (children 3-5)**	**$4.86**	**3E / 3H**

3.3 Nexus Findings

Based on the above methodology, the maximum estimated nexus is $2.47 per gross square foot for residential buildings and $4.86 per gross square foot for non-residential buildings (Table 14). Charging both residential and commercial development the maximum supportable fee would not result in double-counting the impact on child care because the total impact has been allocated proportionally to the two development types.

TABLE 14: MAXIMUM SUPPORTABLE IMPACT FEES FOR CHILD CARE

	Maximum Supportable Citywide Fee
Residential Demand	
Child Care for Infant and Toddler Care (0-2) ($/GSF)	$0.75
Child Care for Preschool Care (3-5) ($/GSF)	$1.72
Non-Residential Demand	
Child Care for Infant, Toddler, and Preschool Care (0-5) ($/GSF)	$4.86
Total Child Care Fee	
Residential ($/GSF)	$2.47
Non-Residential ($/GSF)	$4.86

[36] Based on the 2014 San Francisco Nexus Study, based on South San Francisco Child Care Facilities Impact Fee Nexus Study and surveys of corporate employees and other child care studies, reviewed by Brion & Associates, including Santa Monica's New Child Care Fee Nexus Study (as cited in Table 6 of Child Care Nexus Study for San Francisco by Brion & Associates); assumes one child needing care per employee. The assumptions from the 2014 San Francisco Nexus Study source have been used as a review of various nexus studies and the research conducted for these studies confirms that these are widely used, standard assumptions.

As Table 15 demonstrates, both the highest current residential and non-residential fees are less than the maximum amount supported by the nexus analysis by more than 10 percent.

TABLE 15: COMPARING PROPOSED MAXIMUM SUPPORTABLE CHILD CARE FEES TO EXISTING (2019) FEES

	Proposed (Max)	Existing (Max)	Percent of Existing Fee Covered by Maximum Supportable Nexus (Maximum/Existing)	Proposed Max > 10% Above Existing
Residential ($/GSF)	$2.47	$2.15	115%	YES
Non-Residential ($/GSF)	$4.86	$1.85	263%	YES

4 Complete Street Infrastructure

This chapter summarizes the nexus analysis for complete streets infrastructure. After providing brief background, this chapter will outline the relevant growth assumptions, the LOS standard developed in the associated *2021 San Francisco Infrastructure Level of Service Analysis*, the methodology used to determine the maximum supportable impact fee, and the final determination of the maximum supportable impact fee.

4.1 Introduction

4.1.1 Complete Streets Background

Complete streets infrastructure encompasses a wide range of right-of-way facilities and plays an important role in the City's transportation goals, health and safety promotion, and environmental objectives. In 2010, the City of San Francisco published the Better Streets Plan (BSP) with design and maintenance guidelines for the pedestrian environment. Constructing "complete streets"[37] – considering safety, creation of social space on the sidewalk, and pedestrian aesthetic – is broadly the main motivator underlying the BSP recommendations. City stakeholders rely heavily on the BSP as their foremost streetscape policy document, representing thorough analysis and design and engineering considerations.

As new residential and non-residential development occurs, it brings an increased demand for new (or expanded and improved) complete streets infrastructure. This relationship between new development, an influx of residents and workers, and a demand for complete streets infrastructure provides the nexus for an impact fee. Providing complete streets is a capital-intensive undertaking. Complete streets impact fees, imposed on new development, help fund the construction of new and enhanced complete streets infrastructure for the additional residents and workers directly attributable to new development.

Note that this nexus analysis represents the first time the City of San Francisco has combined all of the complete streets components into a single nexus metric. In the *2014 San Francisco Citywide Nexus Analysis*,

[37] Complete Streets are defined as streets which "are safe, comfortable, and convenient for travel for everyone, regardless of age or ability – motorists, pedestrians, bicyclists, and public transportation riders." Metropolitan Transportation Commission, "MTC One Bay Area Grant: Complete Streets Policy Development Workshop." October 16, 2012. Section 2.4.13 of San Francisco's Public Works Code outlines San Francisco's complete streets policy, which includes the construction of transit, bicycle, stormwater, and pedestrian environment improvements, where pedestrian environment improvements are defined as sidewalk lighting, pedestrian safety measures, traffic calming devices, landscaping, and other pedestrian elements as defined in the Better Streets Plan.

"streetscape and pedestrian infrastructure" was a separate category from bicycle infrastructure. Although the terms streetscape and pedestrian infrastructure indicate more than sidewalk improvements (encompassing BSP elements such as lighting, landscaping, and safety measures[38]), "complete streets" encompasses sustainable street elements more broadly, including bike lanes, sidewalk paving and gutters, lighting, street trees and other landscaping, bulb-outs, and curb ramps. The "Complete Streets Sidewalk" metric, used to encompass all of these streetscape improvements and assign their costs to sidewalk square footage as a single all-encompassing metric, is described in more detail in Section 4.2.1.

4.1.2 Purpose and Use of Revenues

The purpose of the complete streets development impact fee is to fund capital improvements to San Francisco's complete streets infrastructure. As discussed in the BSP, the City aims to improve the pedestrian environment for all of San Francisco's residents and employees. Acceptable uses of the fees include (but are not limited to) sidewalk paving, lighting installation, pedestrian signalization of crosswalks or intersections, street tree planting, bulb-out construction, street furnishing, landscaping, traffic calming, bike lane improvements, and other streetscape improvements cited in the BSP or Public Works Code (Section 2.4.13).

In addition to the complete streets infrastructure impact fee analyzed here, Planning Code Section 138.1 contains urban design requirements that authorize the Planning Department to require a project to provide physical complete streets improvements in certain instances. Due to the fact that Section 138.1 improvements are a type of complete streets infrastructure, the complete streets nexus calculation includes a 9.2 percent deduction to account for potential Section 138.1 improvements, as shown in Section 4.2.5. This deduction is based on a sampling of 88 projects under development as of the second quarter of 2019, and represents the value of complete streets improvements they were required to provide as a percentage of the maximum complete streets impact fee they could have been charged under the methodology described in Section 4.2.5. The data and calculation were provided by the San Francisco Planning Department.

The maximum supportable impact fee aims to ensure that new development contributes its fair share of funding to complete streets improvements. Because the LOS metric upon which the nexus is based addresses demand of the entire service population, existing and projected, there is a clear relationship between new development, which increases housing and employment space, and an increase in demand for complete streets infrastructure.

This study estimates the maximum supportable impact fee based on the relationship between the cost to provide complete streets infrastructure and the LOS provision to accommodate new development. However, the City may choose to adopt a lower fee as appropriate.

4.2 Nexus Determination

The maximum supportable fee calculation for complete streets infrastructure combines the proposed complete streets infrastructure provision LOS metric with total population and employment growth projections and the cost to provide complete streets infrastructure.

4.2.1 LOS Metric

Because complete streets infrastructure encompasses a wide range of components, the LOS metric put forth in the *2021 San Francisco Infrastructure Level of Service Analysis* – square feet of Complete Streets Sidewalk per service population unit – serves as a proxy for all types of complete streets improvements, and reflects the level of investment that the City has committed to making in the sustainable street environment.

"Complete Streets Sidewalk" is a term that denotes sidewalk with some amount of sustainable street

[38] *San Francisco Better Streets Plan*, 2010.

infrastructure, including components such as lighting, pedestrian signals, street trees, bulb-outs, sidewalk furniture, bike lanes, and any other pedestrian elements defined in the Better Streets Plan (BSP) or Section 2.4.13 of San Francisco's Public Works Code. While the proscription for Complete Streets Sidewalk is not uniform across San Francisco (i.e. the BSP calls for different complete streets infrastructure improvements depending on the site considerations, the street type, the traffic patterns, and so on), the intent of the BSP is to improve all of San Francisco's streetscape.[39] Therefore, the basic square footage of sidewalk is denoted "Complete Streets Sidewalk" to reflect the investments the City is committed to make in the pedestrian and bicycle right-of-way in terms of complete streets infrastructure.

4.2.2 Growth Projections

The horizon for projected growth in demand for complete streets infrastructure is 2025. Between 2019 and 2025, San Francisco is projected to gain 73,584 residents and 55,145 jobs (Table 16). Note that, although the development and fee collection is projected to occur between 2019 and 2025, infrastructure acquisition and development cannot occur until after fee collection, and may not be completed by 2025.

TABLE 16: GROWTH PROJECTIONS FOR COMPLETE STREETS INFRASTRUCTURE (2019 - 2025)[40]

	2019	2025	Growth (2019 - 2025)	Percent Increase
Population				
Residents	908,336	981,920	73,584	8.1%
Employment				
Jobs	768,360	823,505	55,145	7.2%
Service Population Units (SPU)				
SPU	1,292,516	1,393,673	101,157	7.8%

4.2.3 Complete Streets Costs

In order to assign a development cost to the new infrastructure, a value of $64 per square foot of Complete Streets Sidewalk is applied. This number is based on San Francisco's current inventory of selected complete streets elements, and the cost of building those elements.[41] Table 17 illustrates the full calculation.

TABLE 17: SELECT COMPLETE STREETS ELEMENTS AND COSTS

Infrastructure Category	Unit Type	Amount	Unit Cost	Total Cost	Source
Sidewalk Area	Square Feet	152,044,639	$35	$5,321,562,350	SFDPW
Sidewalk Curb & Gutter	Linear Feet	11,969,859	$110	$1,316,684,523	SFDPW
Street Trees	Count	125,891	$2,150	$270,665,650	SFDPW
Curb Ramps	Count	28,826	$32,000	$922,432,000	SFDPW
Class I Bikelanes	Linear Miles	62	$596,250	$37,021,163	SFRPD
Class II Bikelanes	Linear Miles	139	$400,000	$55,768,000	SFMTA
Class III Bikelanes	Linear Miles	209	$200,000	$41,700,000	SFMTA
Class IV Bikelanes	Linear Miles	20	$800,000	$15,896,000	SFMTA

[39] San Francisco Planning Code, Section 138.1.
[40] Based on population projections from Table 3.
[41] This inventory is based on data from the San Francisco Planning Department, Department of Public Works, Public Utilities Commission, and Municipal Transportation Agency.

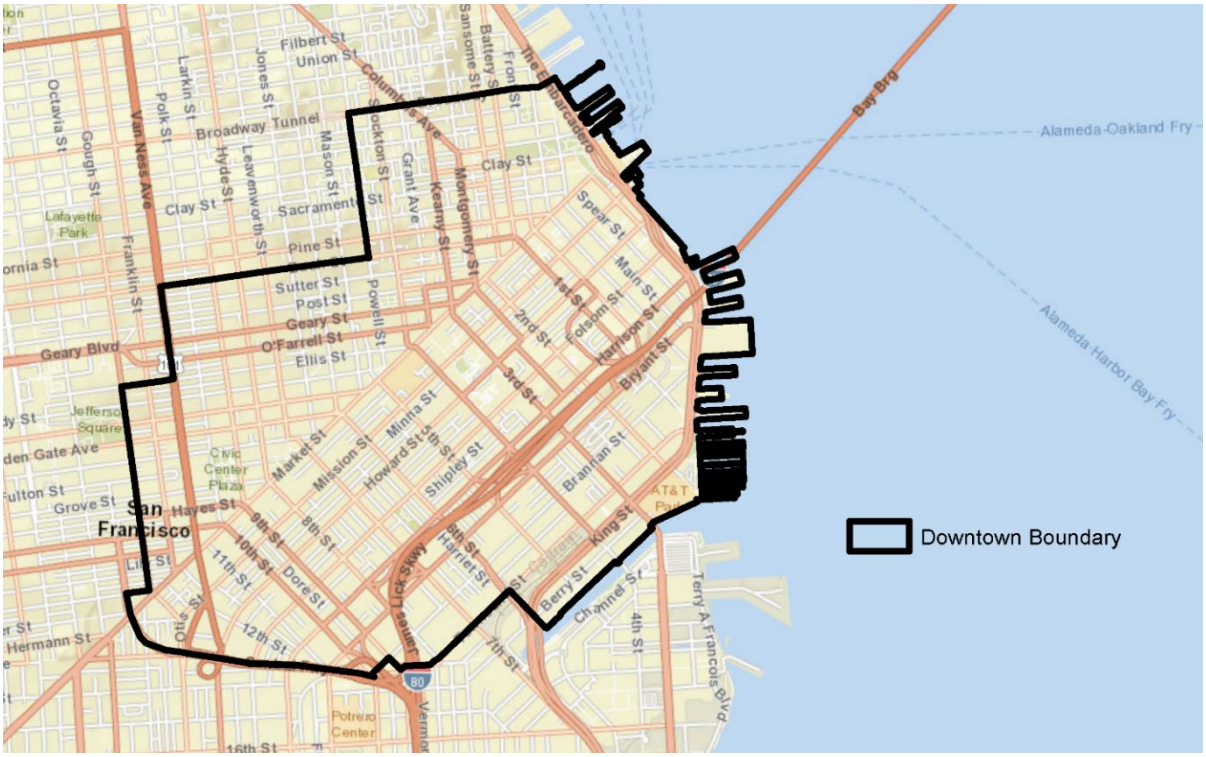
Street Lights	Count	24,046	$42,000	$1,009,932,000	SFDPW
Bulbouts	Count	1,095	$673,545	$737,531,775	SFDPW
Total Infrastructure Cost				$9,729,193,461	
Total Square Feet of Complete Streets Sidewalk				152,044,639	
Complete Streets Cost per Improved Sidewalk Square Foot				$64	

4.2.4 The Downtown Boundary

The cost of building complete streets infrastructure improvements, more so than for other infrastructure categories examined in this analysis, varies significantly by location. Sub-sidewalk basements, underground utilities, and overhead trolley coach wires are just some of the obstacles that may exist in the right of way and make building complete streets infrastructure more complex and expensive. More densely populated neighborhoods tend to have a higher density of these obstacles, making complete streets infrastructure more costly to build in these neighborhoods.

In order to account for this variation in cost, the complete streets fee calculation includes a 20 percent markup for the downtown area (see Table 18) based on information from the Department of Public Works, shown below in Figure 2. Representative complete streets projects located in the downtown area were determined to have costs 20 percent higher, on average, than projects deemed to be representative of typical citywide costs.[42] The downtown area boundary was determined in consultation with the San Francisco Planning Department and includes the most densely populated parts of the City, including areas that are expected to become more densely populated by 2025.

FIGURE 2: THE COMPLETE STREETS DOWNTOWN BOUNDARY



[42] Confirmed in an email from SFDPW staff on December 16th, 2019.

4.2.5 Nexus Methodology & Fee Calculation

The fee calculation methodology (Table 18) calculates the total cost of providing adequate complete streets elements for San Francisco's service population (2019-2025). The residential fee is based on the percentage of service population units arising from the new resident population, and the non-residential (commercial) fee is based on the percentage of service population units arising from the employee population.

TABLE 18: NEXUS METHODOLOGY FOR COMPLETE STREETS INFRASTRUCTURE FEE

*	Measure	Value	Source/Calculation
Service Population			
A.1	Current residential population (2019)	908,339	Table 16
A.2	Projected residential population growth (2019-2025)	73,584	Table 16
B.1	Current service population (2019)	1,292,516	Table 16
B.2	Projected service population growth (2019-2025)	101,157	Table 16
Unit Conversions			
C	GSF of residential development per SPU	443	Table 4
D	GSF of commercial development per SPU	620	Table 4
Metric			
E	Total square feet of Complete Streets Sidewalk citywide	152,044,639	*2021 San Francisco Infrastructure Level of Service Analysis*
F	Square feet of Complete Streets Sidewalk per SPU	118	*2021 San Francisco Infrastructure Level of Service Analysis*
Cost			
G	Unit cost ($/square foot of Complete Streets Sidewalk)	$64	Complete Streets Breakdown
H	Total cost for new streetscape improvements	$761,438,279	B.2 * F * G
I	Cost attributable to incremental growth	$761,438,279	H * 100%
J	Discount for Better Streets Plan Improvements	9.2%	SF Planning[43]
K	Discounted attributable cost	$691,419,165	I * (1 - J)
L	Administrative costs (5% of fee)	$34,570,958	SF Planning
M	Total attributable cost with administrative costs	$725,990,123	K + L
Maximum Supportable Impact Fees: Citywide			
Residential ($/GSF)		$16.19	J / (B.2 * D)
Non-Residential ($/GSF)		$11.58	J / (B .2* C)
Maximum Supportable Impact Fees: Downtown			
Downtown Markup		20%	Email from SFDPW staff, 12/16/2019
Residential ($/GSF)		$19.42	
Non-Residential ($/GSF)		$13.89	

[43] Based on complete streets improvements required of projects under construction in Q2 2019. See Section 4.1.2 for more details.

4.3 Nexus Findings

Based on the approach in Table 18, the maximum supportable citywide impact fees for complete streets infrastructure are $16.19 per gross square foot for residential development and $11.58 per gross square foot for non-residential development. The maximum supportable downtown impact fees are $19.42 per gross square foot for residential development and $13.89 per gross square foot for non-residential development.

TABLE 19: MAXIMUM SUPPORTABLE IMPACT FEES FOR COMPLETE STREETS INFRASTRUCTURE

	Maximum Supportable Citywide Fee
Total Complete Streets Fee: Citywide	
Residential ($/GSF)	$16.19
Non-Residential ($/GSF)	$11.58
Total Complete Streets Fee: Downtown	
Residential ($/GSF)	$19.42
Non-Residential ($/GSF)	$13.89

As Table 20 demonstrates, the maximum supportable impact fee is above the highest fee currently charged for both residential and non-residential development, citywide and in downtown. Furthermore, the maximum supportable impact fee is more than 10 percent higher than each existing fee.

TABLE 20: COMPARING PROPOSED MAXIMUM SUPPORTABLE COMPLETE STREETS INFRASTRUCTURE FEES TO EXISTING (2019) FEES

	Proposed (Max)	Existing (Max)	Percent of Existing Fee Covered by Maximum Supportable Fee (Maximum/Existing)	Proposed Max > 10% Above Existing
Citywide				
Residential ($/GSF)	$16.19	$8.15	199%	YES
Non-Residential ($/GSF)	$11.58	$8.25	140%	YES
Downtown				
Residential ($/GSF)	$19.42	$17.04	114%	YES
Non-Residential ($/GSF)	$13.89	$11.74	118%	YES

5 Transit Infrastructure

5.1 Introduction

This chapter summarizes the nexus analysis for transit infrastructure. After providing a brief background, this chapter will outline the relevant growth assumptions, the LOS standard developed in the associated *2021 San Francisco Infrastructure Level of Service Analysis*, the methodology used to determine the maximum supportable impact fee, and the final determination of the maximum supportable impact fee.

The Transportation Sustainability Fee (TSF) is a citywide development fee that funds costs associated with increased transit service provided by the San Francisco Municipal Transportation Agency (SFMTA) to accommodate development impacts. The TSF is an update of the former Transit Impact Development Fee (TIDF) which was initially adopted in 1981 and applied only to downtown office development. In 2004 the City

substantially revised and expanded the TIDF to apply to most nonresidential development citywide. In 2015 the City revised its transportation fee, introducing the Transportation Sustainability Fee, that, among other things, introduced the transportation fee to residential development, and would over time, replace the existing TIDF fee for commercial development. The TSF establishes the maximum justifiable fee that the City may charge for transit infrastructure. The TSF applies to development in all areas of the City, in addition to an Area Plan with a separately specified transit fee. Area Plan transit fees and the TSF added together may not exceed the nexus amount to ensure compliance with the Mitigation Fee Act.

5.1.1 Transit Infrastructure Background

San Francisco has a mature, built-out transportation network providing rights-of-way (streets, sidewalks, bike paths, and separate light rail corridors) for all modes of travel. On a typical weekday, this network accommodates about 3.2 million trips to, from, or within the City.[44] The SFMTA is responsible for regulating or providing all modes of surface transportation within the City including public transit, bicycling, pedestrian planning (partnering with the Department of Public Works), accessibility, parking and traffic management, and taxi regulation. The transportation system is the citywide network of public facilities[45] that support transportation services for all modes of travel (auto, transit, bicycle, and pedestrian). The SFMTA seeks to provide mobility for its customers through whatever mode they choose.

The Municipal Railway (Muni) is San Francisco's extensive local transit system and is the largest SFMTA operating division. San Francisco is the nation's second most densely populated major city, and Muni is one of the most heavily ridden transit systems in the country on a per capita basis. The system has over 700,000 boardings on an average weekday. Muni focuses on serving downtown employment centers during the morning and afternoon peak periods and also provides cross-town and neighborhood service. With over 70 bus routes and rail lines nearly all city residents are within two blocks of a Muni stop. With nearly 1,000 vehicles, the Muni fleet is unique and includes historic streetcars, biodiesel and electric hybrid buses, electric trolley coaches, light rail vehicles, paratransit cabs and vans, and cable cars.

The City is a major regional destination for employment, shopping, tourism, and recreation. As a result, connections with other parts of the Bay Area are also critical components of the City's transportation system. Due to constraints from water bodies and topography, regional gateways for road vehicles are limited to the Golden Gate Bridge to the north, the Bay Bridge to the east, and two highways (Interstate 280 and Hwy. 101) extending south. Caltrans owns and operates the freeways and funds maintenance of the local highway network within San Francisco, including Hwy. 101 (including Van Ness Avenue and Lombard Street), Hwy. 280, Hwy. 1, and Route 35 (Skyline Boulevard).

There is also a transit rail tunnel under the Bay operated by Bay Area Rapid Transit (BART) and terminals to accommodate ferry travel. The primary regional transit operators that serve the City include:

- Alameda-Contra Costa Transit District ("AC Transit" serving Alameda and Contra Costa counties)
- Bay Area Rapid Transit District ("BART" serving Alameda, Contra Costa, and San Mateo counties)
- Golden Gate Bridge, Highway and Transportation District ("Golden Gate Bus" and "Golden Gate Ferry" serving Marin and Sonoma counties)
- Peninsula Corridor Joint Powers Board ("Caltrain" serving San Mateo and Santa Clara counties)
- San Mateo County Transit District ("SamTrans" serving San Mateo County).
- San Francisco Bay Area Water Emergency Transportation Authority ("WETA" or "San Francisco Bay Ferry"

[44] San Francisco Transportation Sustainability Fee (TSF) Nexus Study, May 2015. The data cited refers to "trips", not "trip ends", as explained in the *Trip Generation* section of Chapter 2.

[45] Private parking lots, shuttles, ride hailing companies, garages, and a few private streets are the only non-public components of the City's transportation facilities.

serving Alameda, Marin, and San Mateo counties)

5.1.2 Purpose and Use of Revenues

The City's transportation system is already highly congested, including significant transit crowding, under current conditions. Congestion occurs particularly during morning and afternoon commute hours in the same eastern areas of the City that are also expected to experience the most development. Pedestrian and bicycle activity will also increase in congested areas. This increased travel activity will directly affect the performance of the City's transportation system and constrain the City's ability to achieve its transportation system goals.

As a dense and built-out urban environment, the City does not have the option of physically expanding its roadways to accommodate more automobiles. Instead, the City's *Transit First* policy directs investments to transit, bike, and pedestrian modes of travel to improve transportation services within the City and shift travel away from the use of single-occupant autos.[46] These investments include increased transit capacity to relieve crowding on key lines as well as pedestrian and bicycle improvements to support increased walk and bike trips. This investment policy thus benefits all travel modes. Those choosing to travel by transit, bicycle, or walking benefit from improvements to the facilities associated with these modes. Those choosing to drive benefit from the congestion reduction caused by the increased use of transit, bicycle, or pedestrian modes associated with these improvements.

To determine the maximum possible transit fee supported by the nexus, this analysis updates two components of the TSF: one component to fund transit capital maintenance, and one component to fund transit capital facilities, discussed below. Each component is calculated separately and then summed to calculate the TSF. Taken together these two components represent the potential use of fee revenues from either the TSF or any of the Area Plan transit fees. Though the TSF is calculated based on transit maintenance and facilities, fee revenues may be used for pedestrian and bicycle improvements to complement revenue from the Complete Streets fee, including Area Plan complete street fees. Increased pedestrian and bicycle activity have the effect of reducing both auto congestion and transit overcrowding, both of which improve transit levels of service.

5.1.2.1 SFMTA Transit Capital Maintenance Component

The transit capital maintenance component of the TSF is based on the same methodology used in the *2015 TSF Nexus Study* updated using the most currently available input data. Revenues are used for capital maintenance operating costs to improve vehicle reliability thereby expanding transit services. The relationship between development and the transit capital maintenance component is summarized below:

- Need for transit capital maintenance: The impact of development on the need for additional transit capital maintenance is based on maintaining the existing transit level of service (transit LOS) as growth occurs. The existing transit LOS is the current ratio of the supply of transit services (measured by transit revenue service hours) to the level of transportation demand (measured by number of auto plus transit trips). As development generates new trips, the SFMTA must increase the supply of transit services and therefore capital maintenance expenditures to maintain the existing transit LOS.
- Use of TSF transit capital maintenance revenue: The benefit to development from the use of fee revenues comes from improving transit vehicle maintenance that increases the availability of vehicles to increase transit service. SFMTA's transit vehicles include motor coaches (buses), trolley coaches (electric buses), light rail vehicles, historic streetcars, and cable cars. Improved vehicle maintenance directly increases revenue service hours by reducing the amount of time that a vehicle is out of service. Fee revenues associated with the Transit Capital Maintenance Component may not fund capital facilities costs to avoid overlap with the transit capital facilities component of the TSF (see description

[46] City and County of San Francisco, *1996 Charter* (as amended through November 2013), Section 8A.115.

of use of revenues in Section 5.1.2.2, below), nor costs in the two categories excluded from the level of service calculation in Table 5.3 (non-vehicle maintenance costs and general administration).

5.1.2.2 Transit Capital Facilities Component

The transit capital facilities component of the TSF is based on the same methodology used in the *2015 TSF Nexus Study*, updated to include the most currently available input data. This component is based on new development's fair share of transit expansion capital project costs based on the most current list of planned capital projects and programs, constrained to reasonably anticipated funding including the TSF. Examples include transit fleet expansion, improvements to increase SFMTA transit speed and reliability, and improvements to regional transit operators such as Caltrain. The relationship between development and the transit capital facilities component of the TSF is summarized below:

- Need for expanded transit capital facilities: Development increases the need for expanded transit facilities due to increased transit and auto trips. The fair share cost of planned transit facilities is allocated to new development based on trip generation from new development as a percent of total trip generation served by the planned facility, including existing development.
- Use of TSF transit capital facilities component revenue: Fee revenues will benefit new development by funding new or expanded transit capital facilities that will support increased transit services.

5.2 Nexus Determination

5.2.1 Growth Projections

The TSF nexus analysis is based on citywide development estimates for 2019 and development projections for 2040 to be consistent with projections used for regional transportation planning and provided by the Association of Bay Area Governments (ABAG). These 21-year projections are consistent with the summary projections presented in Section 1.3.3 and used elsewhere in this report, but they are broken down differently for the purposes of the transit infrastructure category. Estimates of growth in dwelling units and jobs, the metrics used to estimate impacts on the transportation system, are summarized in Table 21. In the appendix, Table 44 and Table 45 provide additional detail on the source of the 2019 estimates and 2040 projections.

TABLE 21: GROWTH PROJECTIONS FOR TRANSIT INFRASTRUCTURE (2019 – 2040)[47]

			2019 – 2040 Growth	
	2019	2040	Amount	Percent
Residential				
Households	402,772	483,693	80,921	20%
Housing Units	402,800	509,200	106,400	26%
Vacancy Rate	0.0%	5.0%		
Nonresidential (Jobs)				
Management, Information & Professional Services	422,273	498,633	76,360	18%
Retail/Entertainment	118,350	117,192	(1,158)	(1%)
Cultural/Institution/Education	91,319	90,848	(471)	(1%)
Medical and Health Services	49,064	67,292	18,228	37%
Visitor Services	25,581	24,788	(793)	(3%)
Production, Distribution, Repair	61,773	73,757	11,984	19%
Total Employment	768,360	872,510	104,150	14%

[47] Table 44 and Table 45.

The growth projections summarized in Table 21 are converted to motorized vehicle trip generation and summarized in Table 22. In the appendix, Table 44 through Table 46 provide detail on the calculation of trip generation based on the land use data and the trip generation rates shown in Appendix Table 47.

TABLE 22: SUMMARY OF TRIP GENERATION[48]

	Trip Generation 2019	Trip Generation 2040	Growth in Trip Generation
Housing	2,066,000	2,439,000	373,000
Nonresidential (ex. PDR)	5,018,000	5,304,000	286,000
Production, Distribution, Repair (PDR)	237,000	282,000	45,000
Total	7,321,000	8,025,000	704,000

5.2.2 LOS Metric

5.2.2.1 SFMTA Transit Capital Maintenance Component

As explained in the *2021 San Francisco Infrastructure Level of Service Analysis*, the LOS metric for transit capital maintenance is the current ratio of the supply of transit services (measured by transit revenue service hours) to the level of transportation demand (measured by number of auto plus transit trips). The calculation includes both transit and auto trips because an increase in the former generates additional demand for transit, and an increase in the latter generates additional transit delays due to increased auto congestion causing a need for additional transit service. The current LOS standard is 1.45 revenue service hours per 1,000 daily trips.

5.2.2.2 Transit Capital Facilities Component

As explained in the *2021 San Francisco Infrastructure Level of Service Analysis*, the LOS metric for transit capital facilities is measured in terms of passenger miles traveled in crowded versus uncrowded conditions systemwide on an average daily basis. The analysis in that report indicated that in 2040, despite improvements in transit infrastructure, crowding will increase to 20 percent from the existing LOS standard of 15 percent.

5.2.3 Nexus Methodology & Fee Calculation

5.2.3.1 Transit Capital Maintenance Component

The TSF accommodates the impact of development by funding additional SFMTA transit capital maintenance to maintain the existing SFMTA transit LOS. As discussed above, transit LOS is based on the existing number of revenue service hours per trip (amount of transit service divided by transit plus auto person trips). The net cost per revenue service hour is shown in Table 23. Non-vehicle maintenance costs and general administrative costs are deducted because these costs are not directly related to providing expanded transit service. Fare box revenue is also deducted because transit system users from development projects would pay fares to offset costs. Other SFMTA funding is not deducted because it is not restricted to uses that increase service. Capital expenditures and funding are not included in the transit capital maintenance component of the TSF. The transit capital impacts of development are addressed separately in the transit capital facilities component of the TSF (see next section).

[48] Table 44, Table 45, and Table 46: San Francisco Development and Trip Generation 2040.

TABLE 23: NET ANNUAL COST PER REVENUE SERVICE HOUR[49]

	Formula		Amount
Total Operating Costs	a		$819,700,000
Excluded Operating Costs & Deduct Farebox Revenue			
Non-Vehicle Maintenance	b	$ (82,900,000)	
General Administration	c	(145,400,000)	
Farebox Revenue	d	(197,000,000)	
Subtotal	e = b + c + d		(425,300,000)
Net Annual Costs	f = a + e		$394,400,000
Average Daily Revenue Service Hours	g		10,646
Net Annual Cost per Daily Revenue Service Hour	h = f / g		$37,047

The maximum justified fee for the transit capital maintenance component is based on the net annual cost per revenue service hour converted to a cost per trip. The cost per trip takes into account that the fee is paid once when a development project receives a building permit, but transit service must be provided for years following to serve that development project. The net annual cost per trip is multiplied by a net present value factor representing the funding needed over a 45-year period to provide the additional transit service. These calculations are shown in Table 24, with supporting calculations shown in the appendix, Table 48 and Table 49.

TABLE 24: TRANSIT CAPITAL MAINTENANCE COST PER TRIP[50]

	Formula	Amount
Net Annual Cost per Revenue Service Hour	*a*	$37,047
Revenue Service Hours per 1,000 Average Daily Trips	*b*	1.45
Net Annual Cost per Average Daily Trip[51]	*c = a * b / 1,000*	$53.72
Net Present Value Factor[52]	*d*	73.93
Total Cost per Trip	*e = c * d*	$3,972

The maximum justified transit capital maintenance component of the TSF is based on the cost per trip shown in Table 24 multiplied by the trip generation rates for each economic activity category from Table 46: San Francisco Development and Trip Generation 2040 46. Because cost inputs from Table 24 are based on 2017 data, the fee is inflated to 2020 using the City's annual infrastructure construction cost inflation index. The maximum justified fee is shown in Table 25. The variance in the fee by economic activity category based on trip generation, and the scaling of the fee based on the size of the development project, supports a reasonable relationship between the amount of the fee and the share of transit capital maintenance attributable to each development project.

[49] U.S. Department of Transportation, Federal Transit Administration, National Transit Database, 2017 Annual Database Operating Expense (https://www.transit.dot.gov/ntd/data-product/2017-annual-database-operating-expense); Table 21.

[50] *2021 San Francisco Infrastructure Level of Service Analysis*, Table 18; Table 23 and Table 49.

[51] Auto and transit trips only. Excludes bicycle and pedestrian trips.

[52] Net present value factor represents the multiplier for $1.00 in annual costs to be fully funded over a 45-year period, given interest earnings and inflation.

TABLE 25: TRANSIT CAPITAL MAINTENANCE COMPONENT MAXIMUM JUSTIFIED FEE[53]

Economic Activity Category	Cost per Trip	Trip Generation Rate (per 1,000 sq. ft.)	Maximum Justified Transit Capital Maintenance Fee (2017$) (per sq. ft.)	Maximum Justified Transit Capital Maintenance Fee (2020$) (per sq. ft.)
Residential	$3,972	3.48	$13.82	$16.34
Nonresidential (ex. PDR)	$3,972	12.02	$47.74	$56.46
Production, Distribution, Repair (PDR)	$3,972	6.72	$26.69	$31.56

5.2.3.2 Transit Capital Facilities Component

The impact of increased trip generation from development on the need for expanded transit capital facilities is accommodated by a list of major proposed projects and programs drawn from the SFMTA's most recent long-range plan, the Transportation 2045 report (T2045). Only projects and programs that directly address transit overcrowding by maintaining or expanding transit facilities or that otherwise improve transit service are anticipated to be funded in part by TSF revenue are included in this nexus analysis. The total cost of each project or program is allocated to new development and the TSF is based on one of the following two fair share cost allocation methods:

- Method 1: If the project or program includes both replacement and expansion of an existing transit facility then the total cost is allocated to trips generated by existing and new (2019-2040) development because all development is assumed to be associated with the need for the project or program. Existing development is based on 2019 land use and new development includes all development, Citywide.
- Method 2: If the project or program only provides expanded transit capacity needed to serve demand from new development then the total cost is allocated only to trips generated by new development, because only new development is associated with the need for the project or program.

As shown in Table 26, Method 1 results in an allocation of 8.8 percent of the total cost to new development and the TSF. Method 2 results in an allocation of 100 percent of total cost to new development and the TSF.

TABLE 26: TRIP GENERATION SHARES[54]

Development	Trip Generation	Method 1 Growth Share of 2040 Total	Method 2 Growth Only
2019 Development	7,321,000	91.2%	NA
2019-2040 Development	704,000	8.8%	100.0%
2040 Development	8,025,000	100.0%	NA

The planned projects and programs used to calculate the transit capital facilities component of the TSF are

[53] Table 24, Table 46: San Francisco Development and Trip Generation 2040, and One SF, *2020 Annual Infrastructure Construction Cost Inflation Estimate*, October 21, 2019.

[54] Table 44, Table 45, and Table 46: San Francisco Development and Trip Generation 2040.

shown in Table 27. The planned facilities and costs are identified in supporting documents for the T2045 report (*San Francisco Transportation 2045 Task Force Report*, January 2018). All costs reflect 2017 dollars. The planned projects and programs are shown in three major facility categories:

- Muni Fleet, Facilities and Infrastructure
- Transit Optimization and Expansion
- Regional Transit and Smart Systems Management

Total costs are reduced by 19 percent (to 81 percent of total) to adjust from a 2045 to a 2040 planning horizon, consistent with the growth projections used in this analysis. Furthermore, based on the 2045 projections of costs and funding, currently anticipated funding from existing revenue sources is about 30 percent of total estimated costs. Therefore, total costs are reduced to a level where existing anticipated revenue sources excluding TSF revenue are 70 percent of total costs. Remaining costs would be funded by the TSF and new revenue sources to be identified over the 20-year period.

TABLE 27: TRANSIT CAPITAL FACILITIES ($ MILLION)[55]

Expenditure Category / Project or Program	Total 2045 Cost (in millions)	Total 2040 Cost (in millions)	Total 2040 Cost (Revised)[56] (in millions)
Muni Fleet, Facilities and & Infrastructure			
Facilities, New	$1,111	$900	$141
Facilities, State of Good Repair	3,593	2,910	1,471
Fixed Guideway, State of Good Repair	1,363	1,104	853
Fleet, New	827	670	289
Fleet, State of Good Repair	5,862	4,748	2,234
Subtotal	$12,756	$10,332	$4,988
Transit Optimization & Expansion			
Core Capacity & Transit Enhancements	$1,743	$1,412	$1,177
Major Capital Projects	$5,853	$4,741	$1,397
Muni Forward	525	425	87
Subtotal	$8,121	$6,578	$2,661
Regional Transit & Smart Systems Management			
Caltrain Modernization & SOGR, SF share	$285	$231	$130
BART Vehicles (SF Share)	200	162	-
Downtown Caltrain Extension (DTX) (SF share)	387	313	43
Smart Technology	210	170	54
Transportation Demand Management	145	117	41
Subtotal	$1,227	$994	$268
Total	$22,103	$17,904	$7,917

[55] SFMTA supporting documents prepared for the *San Francisco Transportation 2045 Task Force Report*, January 2018. "SOGR" is "State of Good Repair".

[56] To reflect funding constraints, total 2040 costs are reduced so that reasonably anticipated funding by 2040 (see Table 29), exclusive of TSF revenue and new revenue sources to be identified, is 70 percent of costs.

Table 28 displays the reasonably anticipated funding from existing transit capital facilities revenue sources other than TSF revenue for each of the projects and programs listed in Table 27. Other anticipated sources of revenue include federal, state, regional and local revenues, and were identified in supporting documents for the T2045 report. The “Local” column in the table does not include TSF funding.

The total CIP cost is then allocated to new development and existing development based on the allocation methods discussed above depending on whether the capital improvement item is needed solely as a result of new development, or if the improvement is needed to serve both existing and future development. This allocation is detailed in Table 29.

TABLE 28: TRANSIT CAPITAL FACILITIES ANTICIPATED FUNDING ($ MILLION)[57]

Expenditure Category / Project or Program	Federal	State	Regional	Local[58]	2045 Total Anticipated Funding	2040 Total Anticipated Funding[59]
Muni Fleet, Facilities & Infrastructure						
Facilities, New	$ -	$123	$ -	$ -	$ 123	$ 99
Facilities, State of Good Repair	583	267	-	422	1,272	1,030
Fixed Guideway, State of Good Repair	262	212	100	163	737	597
Fleet, New	81	123	-	45	249	202
Fleet, State of Good Repair	1,203	267	-	460	1,931	1,564
Subtotal	$2,130	$991	$100	$1,090	$4,311	$3,492
Transit Optimization and Expansion						
Core Capacity & Transit Enhancements	$659	$246	$ -	$113	$1,017	$824
Major Capital Projects	628	442	-	137	1,207	978
Muni Forward	-	-	-	75	75	61
Subtotal	$1,288	$688	$ -	$325	$2,300	$1,863
Regional Transit and Smart Systems Management						
Caltrain Modernization & SOGR (SF share)	$20	$49	$ -	$42	$112	$91
BART Vehicles (SF share)	-	-	-	-	-	-
Downtown Caltrain Extension (DTX) (SF share)	-	-	-	37	37	30
Smart Technology	-	-	26	21	47	38
Transportation Demand Management	-	30	-	6	36	29
Subtotal	$20	$79	$26	$105	$231	$188
Total	$3,438	$1,758	$126	$1,521	$6,842	$5,543

[57] SFMTA supporting documents prepared for the *San Francisco Transportation 2045 Task Force Report*, January 2018. "SOGR" is "State of Good Repair".
[58] Excludes TSF revenue.
[59] T2045 costs reduced 19 percent to reflect 2040 planning horizon.

TABLE 29: TRANSIT CAPITAL FACILITIES FAIR SHARE COST ALLOCATION ($ MILLION)[60]

Expenditure Category / Project or Program	Total CIP Cost (in millions)	Alloca-tion Method[61]	Fair Share Cost Allocation	Existing Development (2019)	Potential TSF Cost Share
Muni Fleet, Facilities & Infrastructure					
Facilities, New	$ 141	2	100.0%	$ -	$ 141
Facilities, State of Good Repair	1,471	1	8.8%	1,342	129
Fixed Guideway, State of Good Repair	853	1	8.8%	778	75
Fleet, New	289	2	100.0%	-	289
Fleet, State of Good Repair	2,234	1	8.8%	2,037	197
Subtotal	$4,988			$4,157	$ 831
Transit Optimization and Expansion					
Core Capacity & Transit Enhancements	$1,177	2	100.0%	$ -	$1,177
Major Capital Projects	1,397	2	100.0%	-	1,397
Muni Forward	87	1	8.8%	-	87
Subtotal	$2,661			$ -	$2,661
Regional Transit and Smart Systems Management					
Caltrain Modernization & SOGR (SF share)	$ 130	1	8.8%	$ 119	$ 11
BART Vehicles (SF share)	-	2	100.0%	-	-
Downtown Caltrain Extension (DTX) (SF share)	43	1	8.8%	39	4
Smart Technology	54	1	8.8%	49	5
Transportation Demand Management	41	1	8.8%	37	4
Subtotal	$ 268			$244	$ 24
Total	$7,917			$4,401	$3,516

[60] Table 26 and Table 27.

[61] Method 1 allocates costs based on total trip generation in 2040 (existing and new development). Method 2 allocates costs based only on trip generation from new development (2019-2040).

The potential TSF cost share shown in Table 30 must be adjusted for anticipated funding to calculate the maximum justified funding that could be provided by the TSF. Maximum justified TSF funding is based on applying any estimated funding from existing revenue sources after funding of the existing development cost share. Anticipated funding is first allocated to the existing development cost share. Any funding remaining after allocation to the existing development cost share is then deducted from the TSF cost share. Table 30 shows the maximum justified TSF funding for the transit capital facilities component based on this approach.

TABLE 30: TRANSIT CAPITAL FACILITIES MAXIMUM JUSTIFIED TSF FUNDING SHARE ($ MILLION)[62]

Expenditure Category / Project or Program	Total Pro-grammed Funding	Existing Develop-ment Cost Share	Net Pro--grammed Funding Available For TSF Cost Share	Potential TSF Cost Share	Maximum Justified TSF Funding
Formula	*a*	*b*	*c = a - b*[63]	*d*	*e = d - c*
Muni Fleet, Facilities & Infrastructure					
Facilities, New	$99	$ -	$99	$141	$42
Facilities, State of Good Repair	1,030	1,342	-	129	129
Fixed Guideway, State of Good Repair	597	778	-	75	75
Fleet, New	202	-	202	289	87
Fleet, State of Good Repair	1,564	2,037	-	197	197
Subtotal	$3,492	$4,157	$301	$831	$530
Transit Optimization and Expansion					
Core Capacity & Transit Enhancements	$824	$ -	$824	$1,177	$353
Major Capital Projects	978	-	978	1,397	419
Muni Forward	61	-	61	87	26
Subtotal	$1,863	$ -	$1,863	$2,661	$798
Regional Transit and Smart Systems Management					
Caltrain Modernization & SOGR	$91	$119	$ -	$11	$11
BART Vehicles (SF share)	-	-	-	-	-
Downtown Caltrain Extension (DTX)	30	39	-	4	4
Smart Technology	38	49	-	5	5
Transportation Demand Management	29	37	-	4	4
Subtotal	$188	$ 244	$ -	$24	$24
Total	$5,543	$4,401	$2,164	$3,516	$1,352

The fee schedule for the TSF transit capital facilities component is based on the maximum justified cost per trip and is shown in Table 31. The cost per trip is based on the maximum justified TSF and the total number of trips generated by new development.

[62] Table 28 and Table 29.

[63] Unless negative, then $0.

TABLE 31: TRANSIT CAPITAL FACILITIES COST PER TRIP[64]

	Amount
Maximum Justified TSF Funding	$1,352,000,000
Total Trip Generation	704,000
Cost per Trip	$1,920

The maximum justified fee for each economic activity category is based on the cost per trip shown in Table 31 multiplied by the trip generation rates for each category. The maximum justified fee schedule is shown in Table 32. The variance in the fee by economic activity category based on trip generation, and the scaling of the fee based on the size of the development project, supports a reasonable relationship between the amount of the fee and the share of transit capital facilities attributable to each development project.

TABLE 32: TRANSIT CAPITAL FACILITIES COMPONENT MAXIMUM JUSTIFIED FEE[65]

Economic Activity Category	Cost per Trip	Trip Generation Rate (per 1,000 sq. ft.)	Maximum Justified Transit Capital Facilities Fee (2017 $) (per sq. ft.)	Maximum Justified Transit Capital Facilities Fee ($2020) (per sq. ft.)
Residential	$1,920	3.48	$6.68	$7.90
Nonresidential (excl. PDR)	$1,920	12.02	$23.08	$27.29
Production, Distribution, Repair (PDR)	$1,920	6.72	$12.90	$15.26

5.3 Nexus Findings

The maximum justified Transportation Sustainability Fee is the sum of the two component fees presented in this chapter. The maximum justified TSF is shown in Table 33 per square foot of building space. As explained in the introduction to this chapter, the TSF establishes the maximum justifiable fee that the City may charge for transit infrastructure. The City also imposes various transit fees through area plans in addition to the citywide TSF. Area Plan transit fees and the TSF added together may not exceed the nexus amount to ensure compliance with the Mitigation Fee Act Area. Thus, the maximum justified TSF represents the maximum justified transit fee that the City can adopt either citywide or through an area plan.

[64] Table 22 and Table 30.
[65] Table 31 and Table 46.

TABLE 33: MAXIMUM JUSTIFIED TSF

Economic Activity Category	Maximum Justified Transit Fee per Square Foot including Area Plan Fees		
	Maximum Justified Transit Sustainability Fee		
	Transit Capital Maintenance	Transit Capital Facilities	Total
Residential	$16.34	$7.90	$24.24
Nonresidential (ex. PDR)	$56.46	$27.29	$83.75
Production, Distribution, Repair (PDR)	$31.56	$15.26	$46.82

As Table 34 demonstrates, the highest current total transit impact fees are less than the maximum amount supported by the nexus analysis for non-residential development. The maximum supportable non-residential nexus fee is 110 percent of the existing highest non-residential transit fee. For residential development, the highest existing transit fee occurs in areas subject to the combined TSF, Eastern Neighborhoods, and Central SoMa Infrastructure fees. In those areas the existing transit fee is higher than the maximum supported by the nexus analysis. The maximum supportable residential nexus fee is 74 percent of the combined transit fees in those areas. In Ordinance No. 47-21, the Board of Supervisors amended Section 433.3 to clarify that the permissible uses of the Central SoMa Infrastructure fees include recreation and open space infrastructure projects, as envisioned by the Central SoMa Implementation Strategy. As stated in the 'Note-to-File: Distribution of Funds Collected from the Central SoMa Infrastructure Fee' from SF Planning included in section 10.3 of the Appendix, of the $20 Residential Central SoMa Infrastructure fee for Tier B projects (in 2019 dollars) no more than $9.53 would go toward transit, leaving at least $10.47 to go toward Recreation and Open Space. Therefore, the combination of the EN Infrastructure Fee revenue going toward transit, the Central SoMa Infrastructure Fee revenue going toward transit and the TSF is no greater than the nexus amount established in Table 34 below.

Table 34: Comparing Proposed Maximum Supportable Transit Infrastructure Fees to Existing (2019) Fees

	Proposed (Max)	Existing (Max)	Percent of Existing Fee Covered by Maximum Supportable Nexus (Maximum/Existing)	Proposed Max > 10% Above Existing
Residential ($/GSF)	$24.24	$22.04	110%	YES
PDR ($/GSF)	$46.82	$9.45	495%	YES
Non-Residential (ex. PDR) ($/GSF)	$83.75	$76.52	110%	YES

6 Library Facilities

This chapter summarizes the nexus analysis for library facilities. After providing brief background, this chapter will outline the relevant growth assumptions, the LOS standard developed in the associated *2021 San Francisco Infrastructure Level of Service Analysis*, the methodology used to determine the nexus fee, and the final determination of the nexus fee.

6.1 Introduction

6.1.1 Library Facilities Background

Library facilities serve a vital role in the San Francisco community fabric. In addition to traditional offerings like recreational books and research resources, libraries serve as community gathering sites, aid patrons in accessing government resources such as employment services and tax filing, and provide internet services to the San Francisco public, especially important for those who do not have access to the internet elsewhere in their life. Essential to all these offerings is the infrastructure necessary to provide space and equipment.

As new residential and non-residential development occurs, it brings an increased demand for new (or expanded and improved) library infrastructure. This relationship between new development, an influx of residents, and a demand for library infrastructure provides the nexus for an impact fee. Library facility fees, imposed on new development, are collected to help fund the construction of new library infrastructure for the additional residents directly attributable to new development.

Note that the library facilities methodology analyzes increased demand based on projected residential growth, rather than growth in both residents and employees. This is because, although any California resident can obtain a San Francisco library card, library users typically use libraries closer to their home, and non-resident workers in San Francisco are no more likely to use San Francisco libraries than other residents of the Bay Area who live outside of the City. [66] Furthermore, a survey of infrastructure standards in other cities across North America found that library infrastructure is typically measured against residents, not service population units. For more information, see the *2021 San Francisco Infrastructure Level of Service Analysis.*

6.1.2 Purpose and Use of Revenues

Currently, the City does not charge development impact fees for library infrastructure. The primary purpose of a library facilities impact fee would be to fund expansion of San Francisco's public library capacity to meet the demand generated by new development. That is, impact fee revenues would be intended to mitigate the library demands of the increasing population. Monies from the library impact fee may only be used to fund capital library projects and facilities.

Note that library facilities include a wide range of capital needs: buildings to house library branches and central destinations, computers to provide internet access to the public, tables and chairs to provide study areas and community meeting spaces, bookshelves, and of course lending and reference materials such as books, magazines, and newspapers. [67] In addition, providing internet for job applications and other necessary functions for individuals with no other internet access is a vital function for City residents. [68] Serving as a community gathering site is also rapidly becoming one of the most important characteristics public libraries offer the San Francisco community.[69]

This study estimates the maximum supportable fee based on the relationship between the cost to provide library facilities and the LOS provision to accommodate new development. However, the City may choose to adopt a lower fee as appropriate.

6.2 Nexus Determination

The maximum supportable fee calculation for library facilities combines the proposed library infrastructure

[66] Conversation with SFPL staff on June 26, 2019.
[67] A sample of San Francisco Public Library infrastructure items can be found in the Main Library Fact Sheet: https://sfpl.org/sites/default/files/pdf/libraries/main/about/mainlibraryfactsheet.pdf. Accessed March 11, 2020.
[68] American Library Association, *State of America's Libraries Report* 2019.
[69] Discussion with Planning Department and library staff, October 23, 2019, and April 16, 2020.

provision LOS metric with total population growth projection and the cost to provide library facilities.

6.2.1 LOS Metric

Although library infrastructure comprises a wide range of components as discussed in Purpose and Use of Revenues above, the LOS metric put forth in the *2021 San Francisco Infrastructure Level of Service Analysis* – square feet of library space per resident – encompasses, undifferentiated, library facilities of all types.

As noted in the *2021 San Francisco Infrastructure Level of Service Analysis*, the City currently provides 0.67 square feet of library space per City resident, and has a short-term goal of continuing to provide at least 0.6 square feet of library space per new resident. Note that this short-term goal represents a 10 percent reduction from the current level of service, and is in line with San Francisco Public Library (SFPL)'s plans for expansion in the near future.[70] For more information, see the *2021 San Francisco Infrastructure Level of Service Analysis*. This metric assumes that for each new resident, the City will provide an equivalent level of service, whether it comes in the form of new library space or capacity improvements to existing library space (see Nexus Methodology & Fee Calculation section below for more detail).

6.2.2 Growth Projections

The horizon for projected growth in demand for library facilities is 2025. Between 2019 and 2025, San Francisco is projected to gain 73,584 residents (Table 35). Note that, although the development and fee collection is projected to occur between 2019 and 2025, infrastructure acquisition and development cannot occur until after fee collection, and may not be completed by 2025.

TABLE 35: GROWTH PROJECTIONS FOR LIBRARY INFRASTRUCTURE (2019 - 2025)

	2019	2025	Growth (2019 - 2025)	Percent Increase
Population				
Residents	908,336	981,920	73,584	8.1%

6.2.3 Nexus Methodology & Fee Calculation

The fee calculation methodology (Table 36) calculates the total cost of increasing library space to serve new residents (2019-2025). The fee is based on the gross square feet (GSF) of residential development due to the new resident population.

TABLE 36: NEXUS METHODOLOGY FOR LIBRARY INFRASTRUCTURE FEE

*	Measure	Value	Source/Calculation
Service Population			
A	Current residential population (2019)	908,339	Table 35
B	Projected residential population growth (2019-2025)	73,584	Table 35
Unit Conversions			
C	GSF of residential development per SPU	443	Table 4
D	GSF of commercial development per SPU	N/A	N/A
Metric			
E	Total square feet of all libraries (2019)	605,574	*2021 San Francisco*

[70] Confirmed in a meeting with SFPL staff on April 16th, 2020.

			Infrastructure Level of Service Analysis
F	Square feet of library per resident	0.6	*2021 San Francisco Infrastructure Level of Service Analysis*
Cost			
G	Incremental square feet of library required to maintain LOS	44,152	B * F
H	Cost of adding library space ($/square foot)	$1,760	Email from Randle McClure, SFPL, 9/16/2019
I	Total Cost for incremental library space	$77,706,842.66	G * H
J	Administrative costs (5% of fee)	$3,885,342	SF Planning
K	Total attributable cost with administrative costs	$81,592,185	I + J
Maximum Supportable Impact Fees			
Residential ($/GSF)		**$2.50**	K / (B * C)
Non-Residential ($/GSF)		**N/A**	N/A

6.3 Nexus Findings

Based on the approach in Table 36, the maximum supportable residential fee is $2.50 per gross square foot. This study does not consider the supportability of a library facilities fee for commercial development.

TABLE 37: MAXIMUM SUPPORTABLE IMPACT FEES FOR LIBRARY INFRASTRUCTURE

	Maximum Supportable Citywide Fee
Total Library Fee	
Residential ($/GSF)	$2.50
Non-Residential ($/GSF)	N/A

7 Fire Department Facilities

This chapter summarizes the nexus analysis for fire department facilities. After providing brief background, this chapter will outline the relevant growth assumptions, the LOS standard developed in the associated *2021 San Francisco Infrastructure Level of Service Analysis*, the methodology used to determine the maximum supportable impact fee, and the final determination of the maximum supportable impact fee.

7.1 Introduction

7.1.1 Fire Department Facilities Background

The San Francisco Fire Department (SFFD) provides vital emergency services to residents and employees in the City of San Francisco. Its services can largely be divided into two categories: fire suppression and emergency medical services (EMS). EMS in particular has been a rapidly-growing need over the last several years in the City.[71] For both fire suppression and EMS, fire department facilities play an essential role in providing emergency services. Stations must be located throughout the City to ensure response times are sufficiently

[71] Meeting with Jesus Mora and Olivia Scanlon, Fire Department staff, September 6, 2019.

fast. Ambulances and fire engines need to be available to transport personnel and equipment necessary to perform services.

As new residential and non-residential development occurs, it brings an increased demand for new (or expanded and improved) fire department infrastructure. This relationship between new development, an influx of residents and employees, and a demand for fire department infrastructure provides the nexus for an impact fee. Fire department facility fees, imposed on new development, help fund the construction of new fire department infrastructure for the additional residents and employees directly attributable to new development.

7.1.2 Purpose and Use of Revenues

The purpose of the fire department facilities impact fee is to fund expansion of San Francisco's fire department capacity to meet the demand from new development. That is, impact fee revenues are intended to be used to mitigate the fire department demands of the increasing population. Monies from the fire department impact fee may only be used to fund capital fire department projects and facilities.

Fire department facilities include two main categories of capital needs: buildings and vehicles. Examples of fire department buildings include fire houses and ambulance deployment centers, both essential facilities for providing fire suppression and EMS services. Vehicles primarily consist of fire engines and ambulances, and tend to move around different fire department buildings and other parts of the City depending on need.[72]

This study estimates the maximum supportable fee based on the relationship between the cost to provide fire department facilities and the LOS provision to accommodate new development. However, the City may choose to adopt a lower fee as appropriate.

7.2 Nexus Determination

The maximum supportable fee calculation for fire department infrastructure combines the proposed fire department infrastructure provision LOS metric with total population and employment growth projections and the cost to provide fire department infrastructure.

7.2.1 LOS Metric

Because department infrastructure encompasses a wide range of components, the LOS metric put forth in the *2021 San Francisco Infrastructure Level of Service Analysis* – fire department facilities per service population unit – serves as a proxy for all types of fire department infrastructure, and reflects the level of investment that the City has committed to making in fire suppression and EMS infrastructure.

As noted in the *2021 San Francisco Infrastructure Level of Service Analysis*, the City is currently responsible for providing 0.034 fire department facilities per service population unit, and aims to maintain this provision into the future. This metric assumes that for each new service population unit, the City will provide an equivalent level of service, whether it comes in the form of new fire department buildings or capacity improvements to existing fire department facilities by adding new capital infrastructure such as vehicles.

7.2.2 Growth Projections

The horizon for projected growth in demand for fire department facilities is 2025. Between 2019 and 2025, San Francisco is projected to gain 73,584 residents and 55,145 jobs (Table 38). Note that, although the development and fee collection is projected to occur between 2019 and 2025, infrastructure acquisition and development cannot occur until after fee collection, and may not be completed by 2025.

[72] Meeting with Jesus Mora and Olivia Scanlon, Fire Department staff, September 6, 2019.

TABLE 38: GROWTH PROJECTIONS FOR FIRE DEPARTMENT INFRASTRUCTURE (2019 - 2025)

	2019	2025	Growth (2019 - 2025)	Percent Increase
Population				
Residents	908,336	981,920	73,584	8.1%
Employment				
Jobs	768,360	823,505	55,145	7.2%
Service Population Units (SPU)				
SPU	1,292,516	1,393,673	101,157	7.8%

7.2.3 Nexus Methodology & Fee Calculation

The fee calculation methodology (Table 40) calculates the total cost of providing adequate fire department facilities for San Francisco's service population (2019-2025).

In order to assign a development cost to the new infrastructure, Table 39 estimates the total replacement cost of existing fire department infrastructure. Table 40 then apportions this cost per fire department facility and applies that cost to the new facilities necessary to maintain the current level of service into 2025.

TABLE 39: SELECT FIRE DEPARTMENT INFRASTRUCTURE INVENTORY AND COSTS[73]

SFFD Infrastructure Type	Number	Unit Cost	Total Replacement Cost
Vehicles			
Ambulance[74]	82	$133,802	$10,971,764
Chief[75]	19	$42,324	$804,156
Engine[76]	81	$586,939	$47,542,059
Specialty[77]	23	$723,824	$16,647,952
Truck[78]	42	$1,324,545	$55,630,890
Buildings			
Fire Houses	43	$15,000,000	$645,000,000
Ambulance Deployment Center	1	$45,000,000	$45,000,000
Totals			
Vehicle Subtotal			$131,596,821
Building Subtotal			$690,000,000
Total Infrastructure Cost			$821,596,821

[73] Fire Department infrastructure inventory and costs provided by Jesus Mora, SFFD staff, in an email from September 12, 2019.

[74] "The Medic Unit's [Ambulance's] priority is emergency medical assistance." *San Francisco Fire Department Apparatus Inventory*, August 2009.

[75] "The Chief Vehicle is used by Battalions and Divisions. It is the command vehicle and has the capacity to serve as a command post." *San Francisco Fire Department Apparatus Inventory*, August 2009.

[76] "The Engine's first priority is fire extinguishment. Subsequent priorities include rescue and emergency medical assistance." *San Francisco Fire Department Apparatus Inventory*, August 2009.

[77] Specialty vehicles consist of a number of other SFFD unit types, including CO2 Unit, Mini Pumper, Mobile Air, Pollution Control Unit, Utility Unit, Surf Rescue Unit, Fireboat, and Hazardous Materials Unit. *San Francisco Fire Department Apparatus Inventory*, August 2009.

[78] "The Truck's first priority is rescue. Subsequent priorities include ventilation, salvage and overhaul." *San Francisco Fire Department Apparatus Inventory*, August 2009.

The residential fee is based on the percentage of service population units arising from the new resident population, and the non-residential (commercial) fee is based on the percentage of service population units arising from the employee population.

TABLE 40: NEXUS METHODOLOGY FOR FIRE DEPARTMENT INFRASTRUCTURE FEE

*	Measure	Value	Source/Calculation
Service Population			
A.1	Current residential population (2019)	908,339	Table 38
A.2	Projected residential population growth (2019-2025)	73,584	Table 38
B.1	Current service population (2019)	1,292,516	Table 38
B.2	Projected service population growth (2019-2025)	101,157	Table 38
Unit Conversions			
C	GSF of residential development per SPU	443	Table 4
D	GSF of commercial development per SPU	620	Table 4
Metric			
E	Total number of fire department facilities (2019)	44	*2021 San Francisco Infrastructure Level of Service Analysis*
F	SFFD facilities per 1,000 service population units	0.034	*2021 San Francisco Infrastructure Level of Service Analysis*
Cost			
G	Incremental fire department facilities required to maintain LOS	3.4	(B.2 / 1,000) * F
H	Total cost of providing fire department facilities at current LOS	$821,596,821	Table 39
I	Cost per current facility	$18,672,655	H / E
J	Cost attributable to incremental growth	$64,300,836	I * G
K	Administrative costs (5% of fee)	$3,215,042	SF Planning
L	Total attributable cost with administrative costs	$67,515,877	N + O
Maximum Supportable Impact Fees			
Residential ($/GSF)		**$1.51**	L / (B * C)
Non-Residential ($/GSF)		**$1.08**	L / (B * D)

7.3 Nexus Findings

Based on the approach in Table 40, the maximum supportable residential fee is $1.51 per gross square foot, and the maximum supportable non-residential fee is $1.08 per gross square foot.

TABLE 41: MAXIMUM SUPPORTABLE IMPACT FEES FOR FIRE DEPARTMENT INFRASTRUCTURE

	Maximum Supportable Citywide Fee
Total Firefighting Fee	
Residential ($/GSF)	$1.51
Non-Residential ($/GSF)	$1.08

8 Conclusion

As described in the previous sections, the maximum supportable fees determined for the six infrastructure categories (recreational and open space, child care, complete streets, transit, library, and fire department infrastructure) mostly exceed the highest current fees charged at either the citywide or neighborhood level, with the exception of the residential child care and transit fees. While the City may choose to charge a lesser fee to new residential or non-residential development, this report demonstrates that the current fees continue to be supported through a demonstrated nexus between new development and the scale of the fee, and establishes a nexus for two new fees to be added.

TABLE 42: MAXIMUM SUPPORTABLE FEES PER INFRASTRUCTURE CATEGORY (2019)

Citywide Nexus Fees	Maximum Supportable Fee
Recreational and Open Space	
Residential ($/GSF)	$46.22
Non-Residential ($/GSF)	$33.05
Child Care	
Residential ($/GSF)	$2.47
Non-Residential ($/GSF)	$4.86
Complete Streets: Citywide	
Residential ($/GSF)	$16.19
Non-Residential ($/GSF)	$11.58
Complete Streets: Downtown	
Residential ($/GSF)	$19.42
Non-Residential ($/GSF)	$13.89
Transit	
Residential ($/GSF)	$24.24
Production, Distribution, and Repair (PDR) ($/GSF)	$46.82
Non-Residential (ex. PDR) ($/GSF)	$83.75
Libraries	
Residential ($/GSF)	$2.50
Non-Residential ($/GSF)	N/A
Fire Department Facilities	
Residential ($/GSF)	$1.51
Non-Residential ($/GSF)	$1.08

9 Addendum

The bulk of this report was completed in 2019, using 2019 data, costs, and demographic projections. However, since the report was finalized in 2021 and will face adoption in 2021, the maximum supportable impact fees in Table 42 must be adjusted from 2019 dollars to 2021 dollars.

The City annually adjusts all development impact fees using an Annual Infrastructure Construction Cost Inflation estimate (AICCIE). To derive an appropriate AICCIE, the Capital Planning Committee (CPC) reviews cost inflation data, market trend analyses, the Planning Department's pipeline report, and a variety of national, state, and local commercial and institutional construction cost inflation indices. For 2020, the CPC adopted an AICCIE of 5.5%. For 2021, the CPC adopted an AICCIE of 3.5%. Combined, these constitute an inflation factor of 9.2%. Therefore, all maximum supportable nexus fees determined in this report in 2019 dollars (Table 42) must be increased by 9.2% as an adjustment to 2021 dollars. The adjusted maximum supportable impact fees for 2021 are shown in Table 43 below.

TABLE 43: POTENTIAL MAXIMUM SUPPORTABLE FEES PER INFRASTRUCTURE CATEGORY (2021)

Citywide Nexus Fees	Maximum Supportable Fee (2019 dollars)	Maximum Supportable Fee (2021 dollars)
Recreational and Open Space		
Residential ($/GSF)	$46.22	$50.47
Non-Residential ($/GSF)	$33.05	$36.09
Child Care		
Residential ($/GSF)	$2.47	$2.70
Non-Residential ($/GSF)	$4.86	$5.31
Complete Streets: Citywide		
Residential ($/GSF)	$16.19	$17.67
Non-Residential ($/GSF)	$11.58	$12.64
Complete Streets: Downtown		
Residential ($/GSF)	$19.42	$21.21
Non-Residential ($/GSF)	$13.89	$15.17
Transit		
Residential ($/GSF)	$24.24	$26.47
PDR ($/GSF)	$46.82	$51.12
Non-Residential (ex. PDR) ($/GSF)	$83.75	$92.45
Libraries		
Residential ($/GSF)	$2.50	$2.73
Non-Residential ($/GSF)	N/A	N/A
Fire Department Facilities		
Residential ($/GSF)	$1.51	$1.64
Non-Residential ($/GSF)	$1.08	$1.18

10 Appendix

10.1 Supplementary Transit Infrastructure Tables

TABLE 44: SAN FRANCISCO DEVELOPMENT AND TRIP GENERATION 2019[79]

	2019 House-holds & Jobs	Residential Vacancy Rate[80] or Gross Sq. Ft. per Employee	2019 Housing Units & 1,000 Sq. Ft.[81]	Trip Generation Rate *(per Housing Unit or 1,000 Sq. Ft.)*[82]	2019 Trip Genera-tion *(average daily trips)*[82]
Residential					
Housing	402,772	0.0%	402,800	5.13	2,066,000
Nonresidential					
Management, Information & Professional Services	422,350	240	101,400	9.87	1,000,000
Retail/Entertainment	118,350	350	41,400	68.00	2,815,000
Cultural/Institution/Education	91,319	350	32,000	23.00	736,000
Medical and Health Services	49,064	350	17,200	22.00	378,000
Visitor Services	25,581	440	11,300	7.84	89,000
Subtotal Nonresidential (ex. PDR)	706,664	288	203,300	24.69	5,018,000
Production, Distribution, Repair	61,773	570	35,200	6.72	237,000
Total Nonresidential	768,360	310	238,500		5,255,000
Total					7,321,000

[79] Source: San Francisco Planning Department; Table 51.

[80] Based on U.S. Census data, the residential vacancy rate in San Francisco was 4.9% in 2000 and 8.2% in 2010. The low estimated rate for 2019 reflects the current high demand for housing in the City.

[81] "1,000 Sq. Ft." is thousand building square feet and applies to nonresidential development.

[82] Trip generation rate and trip generation is for motorized trips only (auto and transit) and excludes bicycle and pedestrian trips.

TABLE 45: SAN FRANCISCO DEVELOPMENT AND TRIP GENERATION 2040[83]

	2040 House-holds & Jobs	Residential Vacancy Rate[84] or Gross Sq. Ft. per Employee	2040 Housing Units & 1,000 Sq. Ft.[85]	Trip Generation Rate *(per Housing Unit or 1,000 Sq. Ft.)*[86]	2040 Trip Genera-tion *(average daily trips)*
Residential					
Housing	483,693	5.0%	509,200	4.79	2,439,000
Nonresidential					
Management, Information & Professional Services	498,633	240	119,700	9.87	1,181,000
Retail/Entertainment	117,192	350	41,000	68.00	2,788,000
Cultural/Institution/Education	90,848	350	31,800	23.00	731,000
Medical and Health Services	67,292	350	23,600	22.00	519,000
Visitor Services	24,788	440	10,900	7.84	85,000
Subtotal Nonresidential (ex. PDR)	798,753	284	227,000	23.37	5,304,000
Production, Distribution, Repair	73,757	570	42,000	6.72	282,000
Total Nonresidential	872,510	308	269,000		5,586,000
Total					8,025,000

[83] Sources: San Francisco Planning Department; Table 51.

[84] Residential vacancy rate reflects a reasonable supply/demand balance in the housing market and not the current low supply/high demand market in the City.

[85] "1,000 Sq. Ft." is thousand building square feet and applies to nonresidential development.

[86] Trip generation rate and trip generation is for motorized trips only (auto and transit) and excludes bicycle and pedestrian trips.

TABLE 46: SAN FRANCISCO DEVELOPMENT AND TRIP GENERATION 2040[87]

	2019-2040 House-holds & Jobs	Residential Vacancy Rate[88] or Gross Sq. Ft. per Employee	2040-2019 Housing Units & 1,000 Sq. Ft.[89]	Trip Generation Rate *(per Housing Unit or 1,000 Sq. Ft.)*[90]	2019-2040 Trip Genera-tion *(average daily trips)*[90]
Residential					
Housing	80,921	NA	106,400	3.48	373,000
Nonresidential					
Management, Information & Professional Services	76,283	240	18,300	9.87	183,000
Retail/Entertainment	(1,158)	350	(400)	68.00	(27,000)
Cultural/Institution/Education	(471)	350	(200)	23.00	(5,000)
Medical and Health Services	18,228	350	6,400	22.00	141,000
Visitor Services	(793)	440	(400)	7.84	(4,000)
Subtotal Nonresidential (ex. PDR)	92,089	257	23,700	12.02	286,000
Production, Distribution, Repair	11,984	570	6,800	6.72	45,000
Total Nonresidential	104,073	293	30,500		331,000
Total					704,000

[87] Sources: San Francisco Planning Department; Table 51.

[88] Residential vacancy rate reflects a reasonable supply/demand balance in the housing market and not the current low supply/high demand market in the City.

[89] "1,000 Sq. Ft." is thousand building square feet and applies to nonresidential development.

[90] Trip generation rate and trip generation is for motorized trips only (auto and transit) and excludes bicycle and pedestrian trips.

TABLE 47: TRIP GENERATION RATES[91]

Economic Activity Category	Trip Generation Rate (average daily person trips)		Motorized Mode Share				Motorized Trip Generation Rate
			Place Type 1	Place Type 2	Place Type 3	Average[92]	
Residential							
Existing 2019[93]	8.4	per housing unit	59%	62%	62%	61%	5.13
Growth 2019-2040[94]	5.7	per housing unit	59%	62%	62%	61%	3.48
Future 2040[95]	7.8	per housing unit	59%	62%	62%	61%	4.79
Nonresidential							
Management, Information & Professional Services[96]	15.7	per 1,000 sq. ft.	54%	80%	94%	63%	9.87
Retail/Entertainment[97]	150.0	per 1,000 sq. ft.	41%	39%	71%	45%	68.00
Cultural/Institution/ Education[97]	23.0	per 1,000 sq. ft.	NA				23.00
Medical and Health Services[98]	22.0	per 1,000 sq. ft.	NA				22.00
Visitor Services[98]	16.8	per 1,000 sq. ft.	45%	62%	53%	47%	7.84
Production, Distribution, Repair (PDR)[99]	7.9	per 1,000 sq. ft.	85%	85%	85%	85%	6.72

[91] Sources: San Francisco Planning Department, Traffic Impact Analysis Guidelines (TIA Guidelines), Appendix F, 2019, Table 1; U.S. Census Bureau, 2013-2017 American Community Survey 5-Year Estimates for San Francisco; Jan A. deRoos, Planning and Programming a Hotel, Cornell School of Hotel Administration, 2011, Figure 21.3.

[92] Mode share by place type from TIA Guidelines. Weighted average rate based on land use across 981 traffic analysis zones (each assigned to one of the three place types) that comprise the City's transportation model. Average rate for nonresidential uses based on 2040 land use. No mode share for Cultural and Medical categories because trip rate based on survey of development projects that counted vehicles only.

[93] Trip rate based on 2019 *TIA Guidelines* (4.5 per bedroom) converted to ADT per housing unit using 1.86 bedrooms per unit derived from recent U.S. Census housing estimates for San Francisco.

[94] Trip rate based on 2019 *TIA Guidelines* (4.5 per bedroom) converted to ADT per housing unit using 1.27 bedrooms per unit, the average of recent San Francisco housing projects.

[95] Motorized trip generation rate based on sum of total citywide motorized trips for existing (2019) and growth (2019-2040) divided by total 2040 housing units. Total trip generation rate (motorized and non-motorized) based on motorized trip generation rate divided by motorized mode share.

[96] Trip rates based on 2019 *TIA Guidelines*.

[97] Trip rates not indicated in 2019 *TIA Guidelines.* Rate drawn from *2015 TSF Nexus Study* and is an average of recent development projects that surveyed only motorized trips.

[98] Trip rate based on 2019 *TIA Guidelines* (8.4 trips per room) and 500 square feet per room based on hotel space programming research paper that indicates a range of 420 to 780 square feet per room, and a recent San Francisco hotel project that has 450 square feet per room.

[99] Trip rate not indicated in 2019 *TIA Guidelines* so used rate from 2002 *TIA Guidelines*.

The following two tables provide support for the calculations presented in Section 5 for the transit capital maintenance component of the TSF. Table 48 provides the source for the inflation and interest rates that are inputs to the model for the net present value factor shown in Table 24. Table 49 provides a truncated version of the model used to calculate the net present value factor.

TABLE 48: INFLATION AND INTEREST RATES[100]

Cost Inflation[101]			Interest Earned[102]		
Calendar Year	Index	Annual Rate	Fiscal Year Ending	Index	Annual Rate
2018	285.6	3.89%	2018	104.8	1.63%
2017	274.9	3.23%	2017	103.1	0.93%
2016	266.3	2.98%	2016	102.2	0.67%
2015	258.6	2.62%	2015	101.5	0.75%
2014	252.0	2.86%	2014	100.7	0.73%
2013	245.0		2013	100.0	
Five-Year Compounded Annual Average		3.11%	Five-Year Compounded Annual Average		0.94%

TABLE 49: NET PRESENT VALUE FACTOR[103]

	Year	1	2	3	…	43	44	45
Beginning Fund Balance[104]	a	73.93	73.62	73.29	…	10.99	7.47	3.81
Interest Earnings[105]	b = a * 0.94%	0.69	0.69	0.69	…	0.10	0.07	0.04
Expenditures[106]	c = c (prior yr) * 3.11%	(1.00)	(1.03)	(1.06)	…	(3.62)	(3.73)	(3.85)
Ending Fund Balance	d = a + b - c	73.62	73.29	72.91	…	7.47	3.81	0.00
Net Present Value Factor[104]		73.93						

[100] Sources: Association of Bay Area Governments (https://abag.ca.gov/tools-resources/data-tools/consumer-price-index); S.F. Treasurer's Office (http://sftreasurer.org/reports-plans).
[101] San Francisco Bay Area Consumer Price Index (index 1982-84 = 100).
[102] Average annual interest earning on City and County of San Francisco pooled fund balances (index 2013 = 100).
[103] Note: This table models the amount necessary to collect in Year 1 such that $1.00 in expenditures can be sustained for 45 years given inflation and interest earnings. Source: Table 48.
[104] Beginning fund balance in Year 1 is solved for to calculate the net present value factor. The Year 1 value is set such that the Year 45 ending fund balance equals $0.00. In all other years the beginning fund balance equals the ending fund balance from the prior year.
[105] Assumes interest earned on beginning fund balance and all expenditures made at end of year.
[106] Expenditures at beginning of Year 1 equal $1.00 and are inflated assuming all costs represent end of year (inflated) values.

10.2 New Construction Average Housing Unit Size Memorandum

To: Seung Yen Hong & Mat Snyder (Planning Dept.)
From: Robert D. Spencer, Urban Economics
CC: Humberto Castro & Asher Butnik (HATCH Engineering)
Date: January 13, 2020
Subject: New Construction Average Housing Unit Size

The purpose of this memo is to provide the supporting data for a planning assumption of 1,000 square feet on average per new housing unit for use in the nexus study. This assumption is used throughout the nexus study to convert public facility needs per capita or per housing unit to a fee imposed per building square foot.

The *2014 San Francisco Citywide Nexus Analysis* and *2015 TSF Nexus Study* used 1,156 square feet per housing unit based on an average rentable area size of 925 square feet per unit and a building efficiency rate of 80 percent. This factor was used in in the 2008 Eastern Neighborhoods Impact Fee and Affordable Housing Analysis. At the time of the *2014 San Francisco Citywide Nexus Analysis* , Planning Department staff (Kearstin Dischinger) had concluded that this assumption still reflected current conditions.

Forces related to demographics (smaller housing size) and market economics (increasing housing costs) in the city are likely pushing average unit size lower since the 1,156 square feet per unit factor was developed. Indeed, a 2017 SPUR report estimates 800 square feet per unit (640 rentable area and 80 percent building efficiency). A July 2019 article by Curbed San Francisco cites rental apartment data from Zumper and Rent Café that results in an estimate of 921 square feet per unit (737 square feet per unit rentable area and 80 percent building efficiency).

To test this hypothesis, I pulled available data from the Planning Department's past two annual housing inventory reports (2017 and 2018). These reports include two appendix tables (Table A.3, Major Housing Projects Reviewed and Entitled by Planning Department, and Table A.4, Major Housing Projects Filed at Planning Department) with project descriptions that include data for building area allocated to residential uses and number of housing units. This data is not available for most projects. However, between the two reports a total of 15 projects had this data, which provides a reasonable sample size assuming there is no bias regarding which projects report this data. The results are shown in Table 50, on the following page.

Based on this data and given that the trend towards smaller unit sizes is likely to continue, we suggest using a rounded factor of 1,000 square feet per unit for the purposes of the nexus study.

TABLE 50: AVERAGE HOUSING UNIT SIZE

Project	Units	Square Feet	SF/Unit
2018 San Francisco Housing Inventory Report			
30 Otis St.	406	380,173	936
524 Howard St.	284	300,052	1,057
555 Golden Gate Ave.	48	60,000	1,250
230 7th St.	44	42,710	971
235 Valencia St.	37	28,545	771
1144 Harrison St.	371	366,802	989
2017 San Francisco Housing Inventory Report			
150 Van Ness Ave.	420	441,577	1,051
975 Bryant St.	120	160,000	1,333
1298 Howard St.	124	128,650	1,038
950 Tennessee St.	100	99,075	991
555 Howard St.	63	150,275	2,385
2444 Lombard St.	53	41,875	790
875 California St. / 770 Powell St.	44	52,400	1,191
980 Folsom St.	33	36,494	1,106
1055 Geary St.	120	103,200	860
Total / Average	2,267	2,391,828	1,055

Sources: San Francisco Planning Department, *San Francisco Housing Inventory Report* (2017 and 2018), Tables A.3 and A.4.

10.3 Note-to-File: Distribution of Funds Collected from the Central SoMa Infrastructure Fee

San Francisco Planning

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NOTE-TO-FILE

Date: December 9, 2021
Case No.: 2018-003594CWP
Subject: Distribution of Funds Collected from the Central SoMa Infrastructure Fee

Summary

This note-to-file establishes a staff-level policy determination on the distribution of funds collected under the Central SoMa Infrastructure Fee from residential projects, consistent with recent amendments to Planning Code Section 433.

Background

In December 2018 the Board of Supervisors approved several Ordinances to implement the Central SoMa Plan. The Board of Supervisors' approvals included a comprehensive set of Planning Code amendments, that, in part, created new fees specific to Central SoMa, including the Central SoMa Infrastructure Fee (Planning Code Section 433). Although the stated purpose of the fee was to support the expansion of open space, recreation, and transit infrastructure, as originally adopted, the Central SoMa Planning Code amendments limited the use of funds collected through the Central SoMa Infrastructure Fee to transit projects only.

As a part of the same approval package, the Board of Supervisors also adopted the Central SoMa Plan and Implementation Strategy ("Implementation Document"), which, in part, laid out a comprehensive infrastructure and community benefits package to be implemented over the Central SoMa Plan's 20-year timeframe. The Implementation Document included a financing plan for the community benefits package, which included funding from both existing sources and new sources created by the Central SoMa Plan. The Implementation Document indicated that funds raised by the Central SoMa Infrastructure Fee would be used for recreation and open space as well as transit projects, pending trailing legislation

On April 6, 2021, the Board of Supervisors adopted Ordinance No. 47-21, "Administrative Code, Planning Code – Technical Corrections; Amendments to Various Central South of Market Zoning Provisions," which corrected, clarified, and updated the Administrative and Planning Code where there were inadvertent errors in the original Central SoMa Planning Code legislation. Through this legislation, Planning Code Section 433 was amended to enable Central SoMa Infrastructure Fee funds to go to both transit or recreation and open space projects,

consistent with the Central SoMa Implementation Document. The legislation did not require a particular percentage of the fee to go to transit projects or recreation and open space projects.

Distribution Policy Going Forward

The Planning Department is currently completing a Citywide Nexus Study to establish the maximum supportable impact fees for different types of improvements, pursuant to the California Mitigation Fee Act. For transit projects, the Nexus study supports a maximum $24.24 per square foot fee to residential development projects to fund transit infrastructure projects. To ensure this amount is not exceeded, staff analyzed all impact fees that contribute to transit projects to make sure that all the fees taken together in their entirety do not exceed the nexus maximum. For residential development projects in the Central SoMa Plan area, the potentially applicable transit fees include the Eastern Neighborhoods Infrastructure fee, the portion of the Central SoMa Infrastructure Fee going to transit, and the Transportation Sustainability Fee.

As noted above, Planning Code Section 433 does not require that a specific percentage the Central SoMa Infrastructure Fee go to transit and recreation and open space projects. This Note-To-File hereby establishes that for residential projects that are charged the Central SoMa Infrastructure Fee (i.e., Tier B projects), no more than $9.53 (or 48%) of the total fee shall go toward transit projects, while the remaining $10.47 (or 52%) shall be used for recreation and open space projects.

Next Steps

Planning staff recommends Planning Code text amendments to codify the specified allocations for the uses of the Central SoMa Infrastructure Fee.

10.4 Child Care Nexus Study for City of San Francisco (2007)

BRION & ASSOCIATES

Final Report:

CHILD CARE NEXUS STUDY FOR CITY OF SAN FRANCISCO

Prepared by Brion & Associates
in conjunction with

FCS Group, Inc.
Nilsson Consulting

May 2007

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Executive Summary

The City and County of San Francisco (City) expects to add about 55,900 new residents and 83,800 new employees between 2006 and 2025, including development expected at Mission Bay, Rincon Hill, and Visitation Valley. A portion of these new residents and employees will need child care for their children 0 to 13 years of age. Based on a variety of demand factors that are discussed in this chapter, the following findings are made concerning the need for and the nexus to establish a citywide child care linkage fee in San Francisco. The Department of Children, Youth, and Their Families proposes to expand the Child Care Linkage Fee Program to apply to all land uses citywide. This is in contrast to the existing child care fee that only applies to office and hotel uses in the downtown area.

This child care nexus analysis estimates the number of children associated with residential growth (including residents that work in the City) and employees that work in the City but live elsewhere. The need for these children to have licensed child care is based on a variety of demand factors that are described in more detail below. In summary, 44% of 0 to 13 year old children of residents are assumed to need formal child care and 5% of the children of non-resident employees are assumed to need child care, assuming one child per employee. The analysis does not double-count residents that also work in the City.

The analysis estimates child care demand for three age groups—infants, preschool, and school age—based on industry standards of categorizing care. Child care supply analyzed in this report includes licensed child care centers, family child care homes, school age programs, both licensed and license-exempt, and some private afterschool care facilities.[1]

In general, under the proposed child care program, new development would have two choices: 1. provide child care space on- or offsite at certain rates that vary by land use; or 2. pay a linkage fee that would vary by land use. Monies generated by the fee program would be used to fund new child care facilities throughout the City. These options are currently available in the existing child care fee program.

To summarize, the following steps and assumptions are used to estimate the nexus for establishing the child care linkage fee by land use:

- Total population and non-resident employment growth are estimated by land use category.

[1] It also includes spaces in the San Francisco Unified School District's afterschool program spaces and in the Recreation and Park Department's Latchkey program.

- Density assumptions are applied to estimate new dwelling units and square feet of non-residential space (i.e., persons per household and square feet per employee).

- Child care demand factors are applied to this estimate of new population and employment growth by land use category to estimate number of total children, 0 to 13 years old, needing licensed care.

- An assumption is made regarding San Francisco's policy target for child care. This assumption is that San Francisco plans to fund 100% of the need for new licensed child care created by growth in population and employment. This is consistent with most other cities' child care fees, including the proposed fee in Alameda County and the current fee in Palm Desert.

- The State licensing requirements for child care indoor and outdoor space are applied to the estimated need for child care spaces by land use.

- The total child care space requirements are divided by the amount of development expected in each land use category, i.e., units of residential and by 1,000 square feet for non-residential. This becomes the child care space requirement per land use for indoor and outdoor space.

- The average cost per child care space[2] is applied to the estimated demand for child care spaces by land use to derive total costs by land use.

- The total cost of child care by land use is divided by the number of units or amount of square footage of new development in each land use category to derive the maximum linkage fee rate by land use justified by this nexus study.

- An administration fee is added to fund the cost of administering the linkage fee program, which is estimated at 5% of total facility costs. The total child care facility costs, including administrative costs, is estimated by land use and then divided by the amount of development in each land use category to estimate the maximum possible linkage fee on a per unit or per square foot basis. This is the maximum child care linkage fee that could be charged to new development at the issuance of building permits.

The following items summarize and highlight the results of the child care nexus analysis for the City and County of San Francisco.[3]

[2] See **Table 10**.
[3] Please note that many figures throughout this document are rounded to the nearest 100.

- As shown in **Table S-1**, the City will experience a need for an additional 3,780 formal child care spaces between 2006 and 2025. About 60% of these will come from residential uses or 2,271 spaces and about 40% or 1,509 spaces from non-residential uses.

- On average, the City will need to add about 199 new child care spaces per year to address demand from expected new development. These spaces are expected to cost an average of about $2.57 million per year to construct (see **Table S-1**).

- **Table S-2** summarizes the demand for child care spaces as allocated to different types of child care and the associated cost for each type of care. As shown, child care centers are the most costly type of child care to build with an average cost per space of about $27,400. Because the City wants to provide a mix of different types of care with varying costs and settings, the average cost per space overall would be $12,325, or significantly less than the average center-based space.

- **Table S-3** summarizes the costs of providing child care by land use based on the demand factors for each land use, which vary based on resident and employee densities. Residential uses will generate about 60% of the new cost of child care or about $29.4 million, and non-residential uses will generate the remaining 40% of revenues or $19.5 million. These revenues will cover the total combined costs of $48.9 million needed to provide new child care facilities (including administrative costs) to serve child care needs associated with new development.

- **Table S-4** summarizes the child care requirements for residential and non-residential uses. The requirements are expressed as square feet per dwelling unit by type of unit and square feet per 1,000 square feet of non-residential building space. The child care requirement would include indoor and outdoor space, as shown.

    - Residential uses would fund a range of 12.6 to 19.1 square feet of indoor child care space and 8.7 to 13.2 square feet of outdoor space per dwelling unit based on the nexus analysis.

    - Non-residential uses would fund an average of 9.3 square feet of indoor child care space and 6.4 square feet of outdoor space per 1,000 square feet of building space based on the nexus analysis. Actual rates vary by land use category.

Table S-5 shows the maximum child care linkage fee rates based on this nexus study, which include the following:

- Single Family: $2,272 per unit
- Multi-Family, 0 to 1 bedrooms: $1,493 per unit
- Multi-Family, 2+ bedrooms: $1,704 per unit

- *Average, Residential* *$1,595 per unit or $1.72 per sqft*[4]

- Civic, Institutional, Educational: $1.29 per square foot
- Hotel: $0.72 per square foot
- Industrial: $0.83 per square foot
- Medical: $1.29 per square foot
- Office: $1.29 per square foot
- Retail: $0.97 per square foot

These fee rates include 5% for administrative costs.

- The City has the option to adopt fee rates that are lower than those included in this nexus study. The fee rates discussed in this study reflect the maximum amount of fee that could be charged based on nexus requirements for establishing fees.

Thus, a 100-unit new multi-family (0 to 1 bedrooms) residential project would generate about $149,000 in linkage fees to be used to construct new child care or expand existing child care facilities. The average residential fee of $1,595 per unit is also estimated at $1.72 per square foot for comparison purposes and is based on the assumption that the average size of a new residential unit is 925 square feet. A new 100,000-square foot office project would generate about $129,000 in linkage fee revenue. The existing child care fee for an office in the downtown district is $1.00 per square foot, and that fee has not been increased since its adoption in 1986, although changes have been made to the ordinance for administration purposes. The potential maximum child care linkage impact fee represents a 29% increase over the prior child care fee for office space, and also expands coverage to a full range of non-residential uses located throughout San Francisco.

Policy Options

Several policy options developed by the Department of Children, Youth, and Their Families and the Consultant are included in this nexus study, which would be at the discretion of the Board of Supervisors to consider and adopt as part of implementing the updated Child Care Linkage Fee. These include:

[4] This is for comparison only and assumes an average sized dwelling unit of 925 square feet. The fee would be a "per dwelling unit" fee.

1. *The child care impact fee will address 100% of the need for projected child care demand from 2006 to 2025.*

2. *The child care fee would apply to all land uses citywide. The current child care fee applies to office and hotel uses located only in the downtown area.*

3. *The provision of child care facilities instead of paying the in-lieu fee is limited to non-residential projects that generate demand for at least 14 child care spaces (the equivalent of a large family child care home) or a residential project that wanted to provide a small family child care home within the project, which serves up to 8 children.*

Table S-1
Child Care Requirement and Costs for Residential and Non-Residential Uses From Net New Growth 2006 to 2025
San Francisco Child Care Linkage Fee Nexus Study

Land Use	Required Child Care Spaces (1) Amount	Percent	Total Cost of New of Child Care (2) Amount	Percent	Average per Year 2006-2025 Spaces	Funding
Residential	2,271	60%	$29,392,103	60%	120	$1,546,953
Non Residential	1,509	40%	$19,522,825	40%	79	$1,027,517
Totals	3,780	100%	$48,914,928	100%	199	$2,574,470

(1) Based on incremental growth in population and employment as estimated in Tables 1 through 8.
(2) Costs includes administrative cost of 5%.

Source: Brion & Associates.

Table S-2
Summary of Potential Child Care Costs
From New Development 2006 to 2025
San Francisco Child Care Linkage Fee Nexus Study

Type of Child Care	Number of Child Care Spaces	Average Cost Per Space (1)	Total Child Care Costs
1 Build New Centers: Spaces	1,070	$27,406	$29,335,081
2 New Centers in Existing or New Commercial Space	344	$13,703	$4,713,908
3 Expand at Existing Centers: Spaces	397	$13,703	$5,442,160
4 New Small Family Child Care Homes: Spaces	756	$500	$377,963
5 New Large Family Child Care Home Spaces	378	$1,429	$539,947
6 Expand FCCH from 8 to 14: Spaces	155	$3,333	$516,741
7 School Age at Existing Schools	679	$8,333	$5,659,846
Average Child Care Cost per Space		$12,325	
Total Spaces and Costs	3,780		$46,585,646
Administrative Costs (5%)			$2,329,282
Total Child Care Costs			$48,914,928

(1) See Table 10 for detailed estimates of demand by type of facility and cost factors.
Source: Brion & Associates.

Table S-3
Summary of New Child Care Costs Generated by New Development by Land Use
San Francisco Child Care Linkage Fee Nexus Study

Type of Development	Density Assumptions (1) Factor	Type	Allocated Costs by Land Use	Percent Distribution
Residential Uses				
Single-Family	3.50	persons/household	$1,084,959	2%
Multi-Family, 0 to 1 Bedroom	2.30	persons/household	$16,135,758	33%
Multi-Family, 2 + Bedrooms	2.63	persons/household	$12,171,386	25%
Total Residential	2.35	persons/household	$29,392,103	60%
Non-Residential Uses				
Civic, Institutional, Education	225	sqft per employee	$25,867	0%
Hotel	400	sqft per employee	$680,037	1%
Industrial/PDR	225	sqft per employee	$3,885,985	8%
Medical	225	sqft per employee	$1,115,442	2%
Office	300	sqft per employee	$11,783,734	24%
Retail	350	sqft per employee	$2,031,761	4%
Total Non-Residential			$19,522,825	40%
Total Child Care Costs with Admin. Costs			$48,914,928	100%

(1) Costs are allocated to land uses based on their population and employment densities. See Tables 14 and 15.

Source: Brion & Associates.

Table S-4
Summary of New Child Care Space Requirements by Land Use
San Francisco Child Care Linkage Fee Nexus Study

Type of Development	Child Care Requirements		
	Indoor Space	Outdoor Space	
Residential Uses			
Single-Family	19.1	13.2	sqft per dwelling unit
Multi-Family, 0 to 1 Bedroom	12.6	8.7	sqft per dwelling unit
Multi-Family, 2 + Bedrooms	14.4	9.9	sqft per dwelling unit
Non-Residential Uses			
Civic, Institutional, Education	10.8	7.5	sqft per 1,000 sqft of gross building space
Hotel	6.1	4.2	sqft per 1,000 sqft of gross building space
Industrial/PDR	7.0	4.8	sqft per 1,000 sqft of gross building space
Medical	10.8	7.5	sqft per 1,000 sqft of gross building space
Office	10.8	7.5	sqft per 1,000 sqft of gross building space
Retail	8.1	5.6	sqft per 1,000 sqft of gross building space
Average Non-Residential (1)	9.3	6.4	sqft per 1,000 sqft of gross building space

Note: Child Care demand by land use is based on population and employment densities and other child care demand factors.

(1) The average would apply to uses that do not fit in the above land use categories.

Source: Brion & Associates.

Table S-5
Summary of Maximum New Child Care Linkage Fees by Type of Development
San Francisco Child Care Linkage Fee Nexus Study

Type of Development	Maximum Potential Child Care Linkage Fee	
Residential Linkage Fee (1)		
Single-Family	$2,272	per dwelling unit
Multi-Family, 0 to 1 Bedroom	$1,493	per dwelling unit
Multi-Family, 2 + Bedrooms	$1,704	per dwelling unit
Average, All Units	$1,595	per dwelling unit
Average Per Sqft of Residential Space	$1.72	(3)
Non-Residential Linkage Fee (1)		
Civic, Institutional, Education	$1.29	per sqft of gross building space
Hotel	$0.72	per sqft of gross building space
Industrial/PDR	$0.83	per sqft of gross building space
Medical	$1.29	per sqft of gross building space
Office	$1.29	per sqft of gross building space
Retail	$0.97	per sqft of gross building space
Average Non-Residential (2)	$1.06	per sqft of gross building space

Note: Costs are allocated to land uses based on their population and employment densities.
While the non-residential requirement is per 1,000 sqft, the fee is $ per sqft of space.
(1) Residential fees are by unit type; non-residential fees are per square foot.
(2) The average would apply to uses that do not fit in the above categories.
(3) Assumes the average size unit is 925 sqft per dwelling unit.
Source: Brion & Associates.

1. Introduction and Purpose of Study

The City and County of San Francisco (City) currently has a child care inclusionary zoning ordinance with a linkage fee option, which was adopted in 1986. The child care program applies to office and hotel uses only in the downtown district at $1.00 per square foot for projects with a net addition of 50,000 square feet of gross building space or more. The goal of the program is to "foster the expansion of and ease access to child care facilities affordable to households of low or moderate income."[5]

The child care requirement was originally adopted in 1986, prior to the adoption of AB1600 in 1987, which is now commonly called The Mitigation Fee Act (Government Code 66000). This Act generally requires that a nexus be established for a public entity to adopt a development impact fee. While it is the City's position that a nexus analysis is not needed for the Child Care Linkage Fee Program, the City does want to ensure that the fee is fair and equitable and meets the principles of nexus. The City's child care ordinance was last updated and revised in 2003.[6]

The requirements of the existing zoning ordinance can be summarized as follows:

- Overall, the child care requirement is for a minimum of 3,000 square feet of child care facility space onsite.

- For hotel or office projects less than 300,000 square feet, a 2,000 square foot child care facility is required onsite.

- The child care facility must be a licensed facility.

- The formula for determining the amount of child care space is:

  net addition gross square feet of hotel/office space x .01 = square feet of child care space facility required or the minimums listed above.

- A project sponsor or group of project sponsors within 0.5 miles of each other may elect to provide a child care facility at the above rates offsite, within 1.0 miles of the project(s) to meet the requirement.

- The child care facility must be provided for the life of the development project for which the facility is required or as long as there is demonstrated demand.

- The child care facility must be reasonably accessible to public transportation or transportation provided by the project sponsors.

[5] See Section 314.4.(a)(1) Imposition of Child Care Requirement, page 42, dated April, 9, 2003.
[6] This update included changes to the Transit Impact, Housing, Child Care, Park, and Inclusionary Housing Fees to transfer the collection and enforcement of the said fees to the City Treasurer's Office.

- In all cases above, proof must be provided that the child care facility is leased to a non-profit child care provider without charge for rent, utilities, property taxes, building services, repairs, or any other charges of any nature for a minimum of three years.

- The project sponsor may elect to pay an in-lieu fee at the following rate:

  net addition of gross hotel/office space x $1.00 = total in-lieu fee requirement.

- Payment of the in-lieu fee is made to the City Treasurer, and the Treasurer prepares a certification which the project sponsor submits to the Planning Department as proof of child care mitigation prior to the issuance of the project's building permit.

- A project sponsor may elect to provide a combination of child care space and an in-lieu fee, singly or in conjunction with other project sponsors.

- A project sponsor may enter into an agreement with a nonprofit child care provider to provide a child care facility within the city to meet the conditions of the requirement; the agreement must be for a period of 20 years, with the first three years being made available free of rent, utilities, property taxes, building services, repairs or other charges. To facilitate this agreement, the project sponsor may pay to the nonprofit an amount equal to or in excess of the sum of the in-lieu fee due for the development project.

Since 1986, the City has collected approximately $4.8 million in child care in-lieu fees. Over this period, no revenue was collected during seven of the years. The average annual amount of revenue collected in the last 20 years was $241,000 per year. During the years when revenue was generated, the largest amount of revenue collected in one year was $1.01 million in Fiscal Year 1990/91 and the lowest amount collected was about $26,000 in Fiscal Year 1992/93. Given that the existing fee only applies to downtown office and hotel development, much of the new development in the City over the last 20 years has not paid child care impact fees.

2. Nexus Findings

This section describes the findings which establish the nexus between the need for the Child Care Linkage Fee, the maximum amount of the fee, the need for the facilities to be funded with the fee, and new development. The City's current position is that the present Child Care Linkage Program, including the in-lieu fee provision offered as an alternative to providing child care on- or offsite, is not subject to the requirements of the Mitigation Fee Act or Government Code Section 66000. The City does not expect to alter its position on this matter. However, because the City agreed to sponsor a supporting nexus analysis as part of the citywide fee study effort, and because there is interest in determining whether the Inclusionary Program can be supported by a nexus type analysis as an additional support measure, the City has contracted for the preparation of a nexus analysis at this time. The nexus findings include:

1. The purpose of the fee and related description of the child care facilities for which the revenue will be used;

2. The specific use of the child care fee;

3. The reasonable relationship between the child care facility to be funded and the type of development to be charged the fee;

4. The need for the child care facility and the type of development; and

5. The reasonable relationship between the amount of the child care fee and the proportionality of the cost specifically attributable to new and existing development.

Each of these findings is addressed below.

Purpose of the Child Care Linkage Fee

The purpose of the Child Care Linkage Fee is to fund required capital improvements to create new child care facilities or new spaces at existing child care facilities. These facilities will be available to serve all new residents and employees that require child care in San Francisco.

Use of the Child Care Linkage Fee

The Child Care Linkage Fee revenue will be used by the City and County of San Francisco to construct new child care facilities or provide funding for the expansion of existing child care facilities in the City. This study identifies seven potential options for creating new child care spaces and the fee revenue that will be used to fund these options in the City over the next 19 years, including:

1. Build new centers (free standing);
2. Build new centers in existing or new commercial space;
3. Expand existing centers;
4. Assist new small Family Child Care Homes;
5. Assist new large Family Child Care Homes;
6. Expand Family Child Care Homes from 8 to 14 spaces; and
7. Support school age care at existing schools or community facilities.

The Child Care Linkage Fee revenue will be combined with other City revenues and private funding to fund new child care facilities. A series of grants and loans will be used to allocate funding to child care providers, as is the City's practice with the current child care fee program.

Relationship of the Child Care Linkage Fee to New Development

New child care facilities are required to serve existing development as well as new development. The demand for new child care spaces is based on current projections of child care need prepared as part of this nexus study. The demand for child care from new development uses the same assumptions that have been used for existing development and is based on the methodology discussed at the beginning of this chapter and other research conducted for this study. The fee revenue will be used to fund new development's fair share of required child care facilities and/or new spaces at existing facilities. For development projects which require more than 14 spaces, the developer would have the option of providing the facility on- or offsite or paying the linkage fee. The City's current child care fee allows for either providing child care space or paying an in-lieu linkage fee.

Need for the Child Care Linkage Fee

Each new residential or commercial project that is developed in the City and County of San Francisco will generate new residents and non-resident employees. Current data on the supply of child care in the City shows that approximately two-thirds (or 64%) of the children needing licensed care have an available space. New development will add to this unmet demand for child care and aggravate the existing shortage of child care. The Child Care Linkage Fee will provide or fund new development's share of required child care facilities and spaces over the next 19 years. The linkage fee, however, will not be used to address existing deficiencies.

Proportionality of the Child Care Linkage Fee

This analysis assumes that the City and County of San Francisco will fund 100% of the total potential demand for child care in the City arising from new development through the Child Care Linkage Fee program. New development is being assessed fees only for their proportional share of the cost of providing new child care facilities and spaces in the City, assuming the same cost and demand factors that are applied to existing development. The child care linkage fee program addresses the impact of new development and not existing development. This study presents the maximum amount of fees by land use that could be charged to new development based on its impacts. However, the City can choose to adopt a fee rate that is less than the amounts discussed in this study.

3. Summary of Study Approach

This study estimates the current number of children ages 0 to 13 years old who require child care and the future demand for child care from new development, both residential and non-residential, through 2025.

- Children are analyzed in three age groups:

  1. Birth to 24 months old, or **Infants**
  2. 2 to 5 years old, or **Preschool**
  3. 6 to 13 years old or **School Age**

- Several types of child care spaces and providers are discussed:

  - **Small Family Child Care Home** that serves up to 8 children and can serve all age groups with limits on number of spaces per age group;

  - **Large Family Child Care Home** that serves up to 14 children and can serve all age groups with limits on number of spaces per age group;

  - **Child Care Center** that can serve all age groups, depending on its license(s); infants require a separate license from other age groups; and

  - **School Age**, which typically just serve school age children but may also serve preschool-age children

- Children as a percent of total population is a key factor in the child care demand analysis. These rates are taken from the California Department of Finance's P-3 Report, which forecasts population by age. The following represents a summary of the rates assumed in the analysis:

Year	Infants	Preschool	School Age	Total, 0 to 13
2006	2.3%	4.1%	6.1%	12.5%
2006-2025[7]	1.5%	3.3%	7.2%	12.1%

- While the overall rate does not change very much during the analysis period, the rate by age group does change significantly. In particular, infants and preschool-age children decrease, and school age children increase.

[7] These rates are the average by age over the time period (to 2025).

- All child care spaces analyzed in this report are either licensed or license-exempt[8] child care and spaces provided by the City's Latchkey program run by the Recreation and Park Department. The City's Recreation and Park Department's program is also not considered formally license-exempt but is a main source of school age care in the City. Private school afterschool spaces are not included in the supply data, because it is not possible to determine if they are already counted in other license or license exempt supply data.

- This analysis estimates that 37% of infants with working parents need licensed child care,[9] and 66% of school age children with working parents[10] require licensed child care. For preschool, a total of 100% of all preschool-age children with working parents are assumed to need a licensed preschool space.

- In addition to residents, this study also estimates that 5% of non-resident employees in San Francisco need licensed care, and each of these employees generates one child needing a licensed child care space on average. This factor is based on data derived from child care nexus studies from South San Francisco and Santa Monica.[11]

- The Department of Children, Youth, and Their Families proposes that the child care inclusionary requirement and linkage fee will apply citywide to all new development—and redevelopment where building space increases overall—and will apply to all land uses, residential and non-residential, including:

    - Single Family
    - Multi-Family, Units with 0 to 1 bedroom
    - Multi-Family, Units with 2 or more bedrooms
    - Civic, Institutional, Educational
    - Hotel
    - Industrial

[8] License-exempt spaces are child care providers that are generally associated with a public agency such as a unified school district; typically only school age care is license-exempt. This is a different status than unlicensed care. The local Child Care Resource & Referral Agency collects some data on license-exempt providers, but these providers are not required to register with the State. This analysis uses data collected by the Low Income Investment Fund (LIIF) on license-exempt providers, and from City's Recreation and Park Department's Latchkey program.

[9] Based on a study prepared for Santa Clara County, which surveyed 1,400 working families. Also see Appendix A for more information.

[10] Based on local San Francisco surveys and other child care studies. See Appendix A for more information.

[11] Information on South San Francisco is from "South San Francisco Child Care Facility Impact Free Study" by Brion & Associates, 2002. For the City of Santa Monica, see "Child Care Linkage Program," prepared for the City of Santa Monica by Keyser Marston Associates, Inc., November 2005.

- Medical
- Office
- Retail

For this analysis, single resident occupancy (SRO) units and senior units are not assumed to generate any children by definition and are thus not included in the fee calculations.[12]

- The Consultant and the Department of Children, Youth, and Their Families suggest that a new non-residential project would have to generate the need for at least 14 child care spaces in order to provide child care space to meet its impact or for a residential project, a unit could be set aside for a small family child care home, serving up to 8 children. It is suggested that any project with an impact lower than 14 spaces would pay the linkage fee with the exception of the residential project that prefers to provide a unit onsite for a small family child care home. It is further suggested that projects with an impact of over 14 spaces could choose either option, i.e., pay the fee or build the space, onsite or offsite, consistent with the current child care fee ordinance. It also suggested that residential projects could have the option, at the City's discretion, of setting aside units that could be designated for family child care home units, either small or large, as a means of meeting the requirements of the child care ordinance. The rationale for 14 spaces is that this represents the size of a large family child care home.

- For indoor child care space requirements, a factor of 109 square feet of gross building space per child is required based on the average of 13 recent San Francisco child care projects partially funded through the City's existing Child Care Facilities Fund. This factor includes the 35 square feet of play space per child based on State licensing requirements combined with additional ancillary space, such as kitchens, halls, bathrooms, storage, and lobbies. For outdoor space requirements, a total of 75 square feet of outdoor space per child is required based on State licensing requirements.

[12] It is recognized that some single resident occupancy units do house children, but the intent of this type of housing is not family housing, and, thus, they are excluded; senior housing generally has age restrictions that exclude children.

4. Existing and Projected Demographics

Table 1 shows current (2006) and future (2025) data on population, households/housing units, and employment for San Francisco. The forecast and land use data are based on a recent forecast by Moody's "Economy.com" and adjusted by Brion & Associates, and other land use information and data from the City and County of San Francisco Planning Department. (For further information, refer to the separate section of the consolidated report for the Citywide Development Impact Fee Study: "City Growth Forecast and Demographic Data.") There are an estimated 777,000 residents and 536,000 jobs as of 2006. Future population is estimated at about 833,000 residents and 620,000 jobs by 2025.

Total new development expected to occur from 2006 to 2025 would include the following:

- 55,871 new residents;
- 24,505 new dwelling units; and
- 83,807 new employees.

Given that Mission Bay, Rincon Hill, and Visitation Valley, unlike other areas of the City, are already subject to project specific development impact fees and are therefore excluded from the development assumed to be subject to any of the new fees analyzed in this report, as shown in **Table 1**.

Net new development without Mission Bay, Rincon Hill, and Visitation Valley from 2006 to 2025 that would be subject to the child care fee includes:

- 46,108 new residents;
- 19,146 new dwelling units; and
- 67,367 new employees.

Table 2 presents the number of children in San Francisco based on 2000 U.S. Census data. The percentage of children by age group is based on the breakdown of children by age group from the Census and divided by the total population. Overall, children 0 to 13 years old comprise 11.3% of the population as of 2000. This table also shows the labor force participation rates of parents with children for each age group as of 2000. In calculating these rates, we count households with children in which there are two working parents or a single working parent. The Census breaks this down for households with children under the age of 6 and children ages 6 and over. On average, 57.6% of children under the age of 6 have working parents, and 63.2% of children ages 6 and over have working parents in San Francisco.

For this analysis, the number of children by age for children 0 to 13 years old is estimated based on percentages from the California Department of Finance P-3 Report for the City

and County of San Francisco. **Table 3** first applies the percent of children by age group to the total 2006 population estimate of 760,673 (excluding Mission Bay, Rincon Hill, and Visitation Valley[13]). This 2006 population estimate is based on data from the City's Planning Department and the forecast prepared for the Citywide Development Impact Fee Project and has been adjusted to be in-line with the employment estimates which are from Moody's "Economy.com." Next, the percent of total estimated employed residents in the City and residents who work outside the City (based on 2000 Census data) is applied to the 2006 population estimate to determine the number of children who might need care outside of San Francisco and those that require care in San Francisco. The "Net Residents" or those residents who are presumed to require care for their children in San Francisco is approximately 753,500. Based on this methodology, which discounts the population of those needing care outside of the City, it is estimated that there are approximately 88,000 children between the ages of 0 and 13 in San Francisco as of 2006.

[13] The number of children for Mission Bay, Rincon Hill, and Visitation Valley is included for information purposes in Appendix B, Table F.

Table 1
Projected Growth in San Francisco from 2006-2025
San Francisco Child Care Linkage Fee Nexus Study

Item		Existing Conditions 2006	Projected Growth 2006-2025 Amount (3)	Projected Growth 2006-2025 Avg. Annual Growth Rate	Incremental Average Persons per Household	Total At 2025	Project Area Percent Buildout
Total Population	(1)	777,121	55,871	0.37%		832,992	na
Visitation Valley		11,501	1,242	0.54%		12,743	90%
Mission Bay		2,112	3,711	5.48%		5,823	65%
Rincon Hill		2,835	4,810	5.36%		7,645	100%
Subtotal		16,448	9,763			26,211	
Total w/out MB/RH/VV	(2)	760,673	**46,108**	0.31%		806,781	na
Total Housing Units	(1)	341,052	24,505	0.37%	2.28	365,557	na
Visitation Valley		3,100	276	0.45%	4.51	3,376	91%
Mission Bay		1,200	1,983	5.27%	1.87	3,183	65%
Rincon Hill		1,500	3,100	6.08%	1.55	4,600	100%
Subtotal		5,800	5,359			11,159	
Total w/out MB/RH/VV	(2)	335,252	**19,146**	0.29%	2.27	354,399	na
Total Employment	(1)	536,224	83,807	0.77%		620,031	na
Visitation Valley		1,268	149	0.59%		1,417	100%
Mission Bay		8,901	15,118	5.36%		24,020	100%
Rincon Hill		17,811	1,172	0.34%		18,983	100%
Subtotal		27,981	16,440			44,420	
Total w/out MB/RH/VV	(2)	508,243	**67,367**	0.66%		575,611	na

(1) Employment Projections are from Moody's Economy.com for 2006 to 2025 by industry sector.
Residential (population and household) projections are adjusted to be in line with the employment projections by Economy.com; base data are from the San Francisco Planning Department (October, 2006) based on the Land Use Allocation Study - 2002.

(2) Mission Bay, Rincon Hill and Visitation Valley/Executive Park have separate agreements in terms of fees and have requirements to meet their child care impacts through project mitigation and are excluded from the fee analysis.

(3) The amount of growth shown in boxes would be subject to the Child Care Requirement and Linkage Fee, after additional adjustments in subsequent tables.

Sources: Moody's Economy.com; San Francisco Department of City Planning; David Taussig & Associates, Inc.; Brion & Associates.

Table 2
Children as Percent of Total Population in 2000 and
Labor Force Participation Rates for Parents with Children Under 6 and 6-17 Years in 2000
San Francisco Child Care Linkage Fee Nexus Study

	Population by Age as of 2000					2000
2000 Census Data	**0 to 24 Mos. Years**	**2 to 5 Years**	**6 to 9 Years**	**10 to 13 Years**	**Total 0-13 Years**	**Total Population**
San Francisco Population	13,001	24,267	25,140	25,501	87,909	776,733
Percentage of Total Population	1.7%	3.1%	3.2%	3.3%	11.3%	
Labor Force Participation Rates (1)	57.6%	57.6%	63.2%	63.2%		

(1) Labor Force Participation Rates are calculated for children with two working parents or a working single parent. LFPRs are calculated for children under age 6 and for children ages 6 to 17.

Sources: Census 2000; Brion & Associates.

Table 3
Number of Children and Total Population of San Francisco for 2006 and 2006 to 2025
San Francisco Child Care Linkage Fee Nexus Study

San Francisco		Total Population All Ages		Population by Age (1) 0 to 24 Mos. (infants)	2 to 5 (preschool)	6 to 13 (school age)	Total 0-13
Children as of 2006 (w/out MB, RH, VV)							
Children as % of Population by Age Group (1)				2.3%	4.1%	6.1%	12.5%
Total Population at 2006 (2)		760,673		17,261	31,182	46,569	95,012
Total Estimated Employed Residents in City	41%	315,351	(3)				
SF Employed Residents Working Outside SF (5)	23%	72,739					
Those Needing Child Care Outside SF (5)	5%	7,214	(4)	3,607	3,607		
Net Residents		753,459					
Estimated Children at 2006 (5)				**13,654**	**27,575**	**46,569**	**87,798**
New Children 2006-2025 (w/out MB, RH, VV)							
Children as % of Population by Age Group (6)				1.5%	3.3%	7.2%	12.1%
Net New Population		46,108					
Senior and SRO Population		1,081					
Net Population with Children		45,027					
Estimated Children of New Residents				696	1,505	3,244	5,445
New Employed Residents (7)	50%	22,432					
New Employed Residents Working Outside SF	23%	5,174					
Those Needing Child Care Outside SF (5)	5%	259		129	129		259
Net New Residents Possibly Needing Care		44,768					
Net New Children 2006 to 2025				**566**	**1,375**	**3,244**	**5,186**
Total Children at 2025 (w/ MB, RH, VV)	(8)						
Total Population		832,992					
Senior and SRO Population		24,990					
Net Population with Children		808,003					
Children as Percent of Total Population at 2025				1.2%	2.3%	5.8%	9.3%
Estimated Children of New Residents				9,480	18,666	47,102	75,248
New Employed Residents	50%	402,546					
New Employed Residents Working Outside SF	23%	92,852					
Those Needing Child Care Outside SF (5)	5%	4,643		2,321	2,321		4,643
Total Residents Possibly Needing Care		803,360					
Total Children 2025				**7,158**	**16,345**	**47,102**	**70,605**

(1) Based on the percent of children by age group for San Francisco from DOF P-3 Report and applied to DCP's estimate of existing population as of 2006 (See Appendix Table D).
(2) Excludes Mission Bay, Rincon Hill and Visitation Valley areas as they have special agreements regarding child care.
(3) Based on Employed Residents as percent of total population as of 2000 Census and this rate times 2006 Population estimate.
(4) Based on non-resident employee demand for child care in SF. See Table 6.
(5) Based on Journey to Work data - see Table 5 and Table 6.
(6) Based on total population as estimated times the average percentage of children per age group from above.
(7) Based on forecasts of Employed Residents at 2025 by ABAG.
(8) Note that the analysis for 2025 is based total population at 2025 and includes Mission Bay, Rincon Hill and Visitation Valley to provide an estimate of total demand for child care; these figures are not used in the impact fee calculations but rather for information of total future conditions.

Sources: California Department of Finance; SF City Planning Department; Brion & Associates.

Table 3 also estimates the number of children expected in San Francisco between 2006 and 2025, based on the changes in the percent population that are children, 0 to 13, through 2025. Not including the Single Resident Occupancy population and excluding children assumed to need care outside of San Francisco, it is estimated that there will be 5,186 additional children associated with new development from 2006 to 2025. Using the same methodology, and as shown at the bottom of **Table 3**, the number of total children at 2025 is expected to total approximately 70,605.

Overall, children 0 to 13 in the City as a percent of total population will decline from 12.5% to 9.3% by 2025. This trend is forecast by the California Department of Finance based on changes in demographics, such as the age women have children and the number of children they have. The Association of Bay Area Governments (ABAG) forecasts a reduction of 16,000 in children 0 to 5 for the nine-county region.[14] Almost all counties are forecast to have a net reduction in children ages 0 to 14 by 2025. For instance; Marin County is forecast to lose about 3,200 children 0 to 14, Santa Clara County will lose about 3,900 children 0 to 5, San Mateo County will lose about 4,500 children 0 to 14, Alameda County will lose about 1,500 children 0 to 14, and Contra Costa County will lose 9,800 children 5 to 14. Only Solano and Napa Counties are expected to add children overall from 2005 to 2025.

Even though the City will lose children overall, new development will generate new children, albeit at lower rates than currently, and generate new demand for child care. After accounting for the child care spaces planned to be funded through the proposed fee program, there will still be an unmet demand for child care as discussed further in this study (see **Table 9**).

[14] See *ABAG Projections 2005*, population by age and county.

5. Existing Child Care Demand and Supply

Current Child Care Supply

Table 4 presents the current supply of child care in San Francisco. This data are summarized by type of facility and number of spaces by age group and was provided by the San Francisco Department of Children, Youth, and Their Families and the Department of Human Services. These data are consistent with the supply data being used for preparation of the City's updated Child Care Needs Assessment.

Overall, there are approximately 31,800 child care spaces at a total of 1,012 child care facilities. These facilities do not include the private afterschool programs for school age children. The breakdown of facilities and spaces is (see **Table 4**):

- 303 child care centers with 18,161 spaces;
- 562 small family child care homes with 4,430 spaces;
- 147 large family child care homes with 1,956 spaces; and
- 7,295 school age spaces through the San Francisco Unified School District and the City's Recreation and Park Department's Latchkey programs.

Spaces at child care centers make up over half of all spaces (57%), with small and large family child care homes making up about 20% and school age license-exempt care making up the remaining 23%. The amount and distribution of existing supply includes:

- Infant spaces, at 2,646 or 8% of total;
- Preschool spaces, at 14,410 or 45% of total; and
- School age spaces, at 14,789 or 46% of total.

Non-Resident Employees

Table 5 uses Journey-to-Work data from the 2000 U.S. Census to determine the number of residents who both live and work in San Francisco and the number of residents who work outside of San Francisco. This is the total count of employed residents who live in San Francisco. **Table 5** also shows the total estimated number of employees in San Francisco. Based on these numbers, it is estimated that 55.2% of employees live and work in the City, and 44.8% of employees who work in San Francisco live elsewhere.

For 2006, it is estimated that there are 508,243 jobs in the City, excluding those in Mission Bay, Rincon Hill, and Visitation Valley. Of these jobs, 227,616 are held by individuals that reside outside of the City or 44.8%. Based on employment projections (see **Table 1**) and the estimated percentage of employees who live outside of the City, it is estimated that of the total 575,611 jobs in 2025, the number of jobs held by individuals who do not live in the City will total 257,787. These estimates are used in **Tables 6 through 8** to calculate the estimated number of children of non-resident employees that

need licensed child care in San Francisco. Overall, there will be an increase in jobs held by individuals that do not live in the City, or non-resident employees of about 30,170 through 2025.

In 2006, there are an estimated 227,600 employees who work in the City and live elsewhere. For this analysis, we estimate child care demand for non-resident employees who work in San Francisco. Employees who work and live in San Francisco are counted under population demand estimates below. It is estimated that 5% of these employees in San Francisco have children requiring licensed-based care in the City. This percentage is based on the South San Francisco child care fee nexus study and surveys of corporate employees as well as the recent Santa Monica child care nexus fee study.[15] Of those needing licensed care, the analysis also assumes one child per employee ages 0 to 5. Based on this data, approximately 11,381 children, whose parents work in San Francisco but reside elsewhere, require child care in San Francisco in 2006. By 2025, this number will increase by approximately 1,509 to a total of 12,889 children needing spaces.

Existing Child Care Demand and Supply Comparison

Current child care demand, as well as the current supply of child care in San Francisco, is summarized in this section. **Table 7** calculates the existing demand for child care based on the estimated number of children in 2006 and applying demand factors, including labor force participation rates of parents, and estimates of the need for licensed care by age group. This is calculated by taking the estimated number of children by age group and multiplying it by the labor force participation rates by age. The product of these numbers is considered the number of infant, preschool, and school age children with working parents who need some type of child care.

The percent of children requiring licensed care is then calculated by applying percentages based on a review of several child care studies, including child care impact fee studies (see **Appendix A**). For this study, we assume that, for residents, 37% of infants, 100% of preschool, and 66% of school age children with working parents require licensed care.

For non-resident employee child care demand, which is from 0 to 5 years old, we estimate that 25% of that demand is for infants, and 75% is for preschool-age children. It is assumed that school age children of non-resident employees receive care near their places of residence or near or at their neighborhood schools and not in San Francisco.

[15] Information on South San Francisco is from "South San Francisco Child Care Facility Impact Free Study" by Brion & Associates, 2002. For the City of Santa Monica, see "Child Care Linkage Program," prepared for the City of Santa Monica by Keyser Marston Associates, Inc., November 2005.

Table 4
Child Care Supply Data for San Francisco as of June 2006
San Francisco Child Care Linkage Fee Nexus Study

Type of Child Care Facility		Number of Facilities - Providers	Number of Child Care Spaces by Age: Birth to 24 Mos. or Infant	2 to 5 or Preschool	6 to 13 or School Age	Total Spaces, 0 to 13	Percent Distribution of Spaces by Type
Child Care Center		303	1,080	11,248	5,833	18,161	57.0%
Percent Distribution			6%	62%	32%	100%	
Sm. Family Child Care Home	(1)	562	1,124	2,182	1,124	4,430	13.9%
Percent Distribution			25%	49%	25%	100%	
Lg. Family Child Care Home	(1)	147	441	978	537	1,956	6.1%
Percent Distribution			23%	50%	27%	100%	
School Age Care (2)							
SFUSD Programs (Excel/SF Team)		na			6,895		
Rec & Park LatchKey		na			400		
Total School Age					7,295	7,295	22.9%
Percent Distribution					100%	100%	
Total, All Facilities		**1,012**	**2,646**	**14,410**	**14,789**	**31,842**	100.0%
Percent Distribution			8%	45%	46%	100%	

(1) Distribution of these spaces is based on licensing restrictions by age; actual spaces by age may vary from these estimates. The ages served by FCCHs are not reported to the local Resource and Referral Agency.

(2) From Department of Children, Youth and Their Families (October 2006); excludes some unlicensed community based organizations such as Boys & Girls Clubs and other non licensed or licensed exempt care due to inability to verify total capacity at these programs. Excel/SF Team data is from the San Francisco Unified School District School Health Program Data, 2005-2006. Rec & Park LatchKey Data is from the San Francisco Rec and Park Staff Survey in 2005.

Sources: SF Department of Children, Youth and Their Families; and Brion & Associates.

Table 5
Journey to Work Data and Employees Living Elsewhere but Working in San Francisco by Year
San Francisco Child Care Linkage Fee Nexus Study

San Francisco	Amount	Rates	Notes
Employed Residents that Live & Work in San Francisco in 2000 (1)	322,009 *a*	76.9%	
Employed Residents that Work Outside San Francisco in 2000 (1)	96,544 *b*	23.1%	
Total # of Employed Residents in 2000 (1)	418,553 *c*	100.0%	*a + b = c*
Estimated Total Employees in City as of 2000 Census	583,190 *d*		
Percent of Employees that Live and Work in City in 2000	55.2% *e*		*a / d = e*
Percent of Employees that Live Elsewhere and Work in the City in 2000	44.8% *f*		*100% - e*
Estimated Current Jobs as of 2006 (2)	508,243 *g*		
Employees Living Elsewhere Working in San Francisco in 2006 (3)	227,616 *h*		*g * f = h*
Projected total Jobs at 2025 (2)	575,611 *i*		
Employees Living Elsewhere Working in San Francisco in 2025	257,787 *j*		*i* f = j*

(1) Based on Journey-to-Work data from the 2000 U.S. Census.
(2) See Table 1. Excludes Mission Bay, Rincon Hill and Visitation Valley as they have separate child care arrangements through project mitigation.
(3) Assumes same ratio of employed residents living and working in San Francisco from 2000.

Sources: SF Department of City Planning; Census 2000; Brion & Associates.

Table 6
Existing and Future Child Care Demand from Non-Resident Employees: 2006 and 2025
San Francisco Child Care Linkage Fee Nexus Study

Item	Existing Conditions 2006	Future Conditions 2025	Net Growth, 2006-2025
Employees that live elsewhere but work in San Francisco (1)	227,616	257,787	30,170 (4)
Estimated Number of Children of Employees Needing Licensed Care			
Estimated % of Employees with Children Needing Care (2)	5%	5%	na
Children Needing Licensed Care (3)	11,381	12,889	1,509

(1) Based on SF DCP Projections (Table 1) and U.S. Census Journey-to-Work data (see Table 5).

(2) Based on South San Francisco Child Care Facilities Impact Fee Nexus Study and surveys of corporate employees and other child care studies, reviewed by Brion & Associates, including Santa Monica's New Child Care Fee Nexus Study.

(3) Assumes one child per employee.

(4) See Table 1. Excludes Mission Bay, Rincon Hill and Visitation Valley as they have separate child care arrangements through project mitigation.

Sources: SF Department of City Planning; Census 2000; Brion & Associates.

Table 7
Existing Child Care Demand and Supply in San Francisco in 2006
San Francisco Child Care Linkage Fee Nexus Study

Existing Conditions at 2006		Child Care Demand & Supply by Age: Birth to 24 Mos. or Infant	2 to 5 or Preschool	6 to 13 or School Age	Total. 0 to 13 Years Old
EXISTING DEMAND at 2006					
Resident Children Potentially Needing Care	(1)	13,654	27,575	46,569	87,798
Average Labor Force Participation Rates	(2)	57.6%	57.6%	63.2%	
Children With Working Parents		7,864	15,881	29,454	53,199
% Children Needing Licensed Care	(3)	37%	100%	66%	72%
Children Needing Licensed Care		2,910	15,881	19,498	38,289
Percent of Children by Age Needing Care		21%	58%	42%	44%
Non-Resident Employee's Children Needing Care	(4)	2,845	8,536	-	11,381
Total Demand for Child Care Spaces		5,755	24,417	19,498	49,670
Percent Distribution		12%	49%	39%	100%
EXISTING SUPPLY at 2006	(5)				
Family Child Care Homes					
Small, Licensed for 8		1,124	2,182	1,124	4,430
Large, Licensed for 14		441	978	537	1,956
Child Care Centers		1,080	11,248	5,833	18,161
School Age Care		-	-	7,295	7,295
Current Available Spaces		2,645	14,408	14,789	31,842
Percent Distribution		8%	45%	46%	100%
EXISTING SURPLUS/(SHORTAGE) at 2006		**(3,110)**	**(10,009)**	**(4,709)**	**(17,828)**
Percent Distribution		17%	56%	26%	100%
Percentage of Demand Met by Existing Facilities/Spaces		46%	59%	76%	64%

(1) Based on estimated number of children by age categories for San Francisco from CA Dept. of Finance P-3 Report and applied to City Planning Department's estimate of existing population for 2006.
Excludes residents that work outside of SF and need child care outside SF (see Table 3) and excludes Mission Bay, Rincon Hill and Visitation Valley existing development as estimated through 2006.

(2) Labor force participation rates (LFPRs) are from the 2000 Census and include children with two working parents or single working parents. The Census calculates LFPRs for all children under 6 years, and children 6 to 17 years old. Therefore, LFPRs for infants and preschool are the same. (See Table 2 for more information.)

(3) Not all children with working parents are assumed to need licensed care: the assumptions - % - under each age category are used. The remaining children are assumed to be cared for by family members, nannies, friends, and unlicensed care.
Percentages are based on a detailed review of 12 other child care studies, including impact fee studies.
Infant and preschool demand factors have been developed with the staff of the Dept. of Human Services and DCYF.
School age Demand factor is from San Francisco Rec and Park Staff Survey in 2005.

(4) Includes demand from employees that work in the San Francisco but live elsewhere (see Tables 5 and 6). This analysis assumes one child per employee that needs care residence at the rate of: 25% infants 75% preschool 0% school age
School age children are assumed to have care near their home and school.

(5) See Table 4 for more detail and sources of supply.

Sources: California Department of Finance-P-3 Report; SF City Planning Department; and Brion & Associates.

Applying these assumptions regarding the percent of children needing licensed care for residents and employees generates the total number of children requiring licensed child care spaces by age. The number of existing required spaces totals 49,670. Accounting for the current supply of child care, which is summarized in **Table 4**, we find that there is a shortage of 17,828 spaces overall for children ages 0 to 13 in San Francisco. Most of this shortage is for preschool-age and school age care. Overall, there are child care spaces available for about 64% of the children needing care. This does not account for whether they can afford these child care spaces, however. For infant care, 46% of demand is being met; for preschool, 59% of overall demand is met currently; and for school age children, 76% of demand is being met. Overall, one-third of children that need a licensed child care space may not have one available, irrespective of affordability.

In summary, of total children 0 to 13 living in the City, which equals 87,800; 44%, or slightly less than half, are assumed to require licensed child care outside the home. Overall, there is demand for nearly 50,000 child care spaces. With a supply of about 31,800 spaces, there is a significant shortfall of spaces in the City as of 2006.

Another measure of the unmet need for child care in the City includes the current waiting list for child care. The San Francisco Centralized Eligibility List publishes a monthly report which includes information on the number of children who are eligible for subsidized child care.[16] To be eligible for the List, families must be low-income (i.e., at or below 75% of the State Median Income) and meet at least one of the following needs: working, looking for work, attending school or in training, homeless, medically incapacitated, or receiving Child Protective Services.[17] Thus, not all the children estimated above needing a child care space are eligible for this List because it focuses on low-income children.

As of January 2007, there were 3,039 eligible children on the Centralized Eligibility List. This is over 1.5 times the 1,833 children currently enrolled in subsidized child care in the City. Of the total eligible children in January 2007, 1,242 (41%) were in families that earned 25% or less of the State Median Income. Approximately 45%, or 1,358 children, were in families which earned 25% to 50% of the State Median Income and 374 children (12%) were in families earning 50% to 75% of the State Median Income. Less than 2% of children came from families who earned over 75% of the State Median Income.

Future Child Care Demand

The future demand for child care is shown in **Table 8** and is based on projected population growth between 2006 and 2025 as discussed above. Demand is calculated using the same methodology and assumptions as in the previous tables for current

[16] See *San Francisco Centralized Eligibility List Monthly Report* (as of 1/01/2007) for further explanation on the different categories and more detailed information.
[17] Please see the San Francisco Centralized Eligibility List website: www.celsf.org.

demand and supply, with the exception of children as a percent of the total population, which is forecast to decline very slightly by 2025 from 12.5% in 2006 to 12.1% for the period 2006 to 2025 (see **Table 3**).[18]

Because we do not have estimates of future supply, the future demand analysis only presents future demand. **Table 8** calculates the total new demand for child care between 2006 and 2025, which is expected to equal 3,780 licensed child care spaces. Over half of these spaces, or 2,271 spaces, are generated by San Francisco residents. By age, the breakdown is as follows:

- 498 infant spaces, or 13% of total
- 1,923 preschool spaces, or 51% of total
- 1,358 school age spaces, or 36% of total

Table 9 shows the total child care demand at 2025, based on current and future demand, including the estimated 3,780 spaces to be added through the fee program. Assuming the child care fee program is updated as proposed herein and funds the 3,780 spaces needed, there would be an estimated shortfall of approximately 6,400 spaces at 2025, due to existing deficiencies. By age group, the estimated shortfalls equal:

- 1,228 infant spaces, or 19%;
- 1,618 preschool spaces, or 25%; and
- 3,574 school age spaces, or 56%.

The child care needs of Mission Bay, Rincon Hill, and Visitation Valley, which are excluded from the analysis as discussed above, are estimated for informational purposes and included in **Appendix B: Tables F** and **G**.

[18] The average rates for children as a percent of the total population from the Department of Finance vary slightly from year to year, and this analysis uses the average rates between 2010 and 2025 for the net new growth in the City.

Table 8
Future Demand for Child Care: 2006 to 2025
San Francisco Child Care Linkage Fee Nexus Study

Future Growth - 2006 to 2025		New Population & Employment	% Distribution	New Child Care Demand by Age: Birth to 24 Mos. or Infant	2 to 5 or Preschool	6 to 13 or School Age	Total. 0 to 13 Years Old
Future Child Care Need							
New Population with Children - 2006 to 2025	(1)	44,768	*(see Table 3)*				
Resident Children Potentially Needing Care							
Estimated Number of Children by Age	(2)	*(see Table 3)*		566	1,375	3,244	5,186
Average Labor Force Participation Rates	(3)			57.6%	57.6%	63.2%	
Children With Working Parents				326	792	2,052	3,170
% Children Needing Licensed Care	(4)			37%	100%	66%	72%
Children Needing Licensed Care				121	792	1,358	2,271
Percent of Children by Age Needing Care				21%	58%	42%	44%
Non-Resident Employee's Children Needing Care	(5)	*(see Table 6)*		377	1,131		1,509
Distributed by Land Use Category							
Civic, Institutional, Education		89	0%	0	1	-	2
Hotel-Motel		2,347	3%	13	39	-	53
Industrial/PDR		13,409	20%	75	225	-	300
Medical		3,849	6%	22	65	-	86
Office		40,662	60%	228	683	-	911
Retail		7,011	10%	39	118	-	157
Total Future Employee Demand for Child Care		67,367	100%	377	1,131	-	1,509
Total New Demand for Child Care Spaces				**498**	**1,923**	**1,358**	**3,780**
Percent Distribution				13%	51%	36%	100%

(1) Excludes residents that work outside of SF and need child care outside SF (see Table 3) and represents population associated with SF and MF unit development and excludes SRO and senior units and excludes Mission Bay, Rincon Hill and Visitation Valley existing development as estimated through 2006.

(2) Based on the estimated average number of children by age categories for 2010 to 2015 for San Francisco from CA Dept. of Finance P-3 Report and applied to City Planning Department's estimate of expected new population between 2006 and 2025.

(3) Labor force participation rates are from the 2000 Census and include children with two working parents or single working parents. Rates vary by age, under 6 years and over 6 years (see Table 2).

(4) Not all children with working parents are assumed to need licensed care: the assumptions - % - under each age category are used. The remaining children are assumed to be cared for by family members, nannies, friends, and unlicensed care. Percentages are based on a detailed review of 12 other child care studies, including impact fee studies. Infant and preschool demand factors have been developed with the staff of the Dept. of Human Services and DCYF. School age Demand factor is from San Francisco Rec and Park Staff Survey in 2005.

(5) Includes demand from employees that work in the San Francisco but live elsewhere (see Tables 5 and 6). This analysis assumes one child per employee that needs care residence at the rate of: 25% infants 75% preschool 0% school age School age children are assumed to have care near their home and school.

Sources: California Department of Finance-P-3 Report; SF City Planning Department; and Brion & Associates.

Table 9
Total Child Care Demand at 2025
San Francisco Child Care Linkage Fee Nexus Study

Existing Conditions		Child Care Demand & Supply by Age: Birth to 24 Mos. or Infant	2 to 5 or Preschool	6 to 13 or School Age	Total. 0 to 13 Years Old
DEMAND at 2025					
Resident Children Potentially Needing Care	(1)	7,158	16,345	47,102	70,605
Average Labor Force Participation Rates	(2)	57.6%	57.6%	63.2%	
Children With Working Parents		4,123	9,414	29,791	43,327
% Children Needing Licensed Care	(3)	37%	100%	66%	71%
Children Needing Licensed Care		1,525	9,414	19,721	30,660
Percent of Children by Age Needing Care		21%	58%	42%	43%
Non-Resident Employee's Children Needing Care	(4)	2,845	8,536	-	11,381
Total Demand for Child Care Spaces at 2025		4,371	17,949	19,721	42,041
Percent Distribution		10%	43%	47%	100%
EXISTING & FUTURE SUPPLY at 2025	(5)				
Family Child Care Homes					
Small, Licensed for 8		1,124	2,182	1,124	4,430
Large, Licensed for 14		441	978	537	1,956
Child Care Centers		1,080	11,248	5,833	18,161
School Age Care		-	-	7,295	7,295
Future Supply Funded with Fee Program	(6)	498	1,923	1,358	3,780
Total Expected Spaces at 2025		3,143	16,331	16,147	35,622
Percent Distribution		9%	46%	45%	100%
ESTIMATED SURPLUS/(SHORTAGE) at 2025		**(1,228)**	**(1,618)**	**(3,574)**	**(6,420)**
Percent Distribution		19%	25%	56%	100%
Percentage of Demand Met by Existing & Planned Facilities/Spaces		72%	91%	82%	85%

(1) Based on estimated number of children by age categories for San Francisco from CA Dept. of Finance P-3 Report and applied to City Planning Department's estimate of total future population at 2025. (See Tables 1 and 3).
Note: includes Mission Bay, Rincon Hill and Visitation Valley existing development so as to give a full estimate of total demand at 2025.

(2) Labor force participation rates are from the 2000 Census and include children with two working parents or single working parents. Rates vary by age, under 6 years and over 6 years.

(3) Not all children with working parents are assumed to need licensed care: the assumptions - % - under each age category are used. The remaining children are assumed to be cared for by family members, nannies, friends, and unlicensed care. Percentages are based on a detailed review of 12 other child care studies, including impact fee studies. Demand for preschool is based on the Universal Preschool approach which is a policy goal of the Dept. of Human Services and DCYF. School age Demand factor is from San Francisco Rec and Park Staff Survey in 2005.

(4) Includes demand from employees that work in the San Francisco but live elsewhere (see Tables 5 and 6). This analysis assumes one child per employee that needs care residence at the rate of: 25% infants 75% preschool 0% school age
School age children are assumed to have care near their home and school.

(5) See Table 4 for more detail and sources of supply.

(6) Includes future supply expected to be constructed through the Linkage Fee Program (see Table 8).

Sources: California Department of Finance-P-3 Report; SF City Planning Department; and Brion & Associates.

6. Child Care Facilities Master Plan

As part of this effort, a plan for how the City would provide new child care spaces given the existing supply of child care by type, and the cost of providing new child care by type, has been prepared. The breakdown of new child care spaces by type of facility and age is shown for projected future demand in **Table 10**. This distribution of future spaces reflects the current supply by type of facility and age as well as the likelihood of each type of supply to expand or add more spaces. **Table 10** shows the breakdown of spaces by facility and age for the estimated 3,780 licensed spaces that will be required by new residents and non-resident employees in San Francisco. About 48% of the new spaces will be center-based through new centers, expansions of existing centers, or new centers in new or existing commercial space. About 34% of the spaces will be created through new and expanding family child care homes For school age children, half of the new spaces are assumed to be school age care onsite at existing schools, and the other half will be split between center-based and family child care homes. Based on this breakdown of spaces, **Table 10** also calculates the total costs by type of care for new child care spaces. Child care spaces at new child care centers are the most expensive at approximately $27,400 per space based on data from other San Francisco child care projects over the last several years.[19] The costs per space by type of care are:

- $27,400 per space for new child care center spaces;
- $13,700 for spaces in existing or new commercial space;
- $13,700 per space for existing child care centers which choose to expand;
- $500 per space for new small family child care homes;
- $1,429 per space for new large family child care homes;
- $3,333 per space for small family child care homes to expand to large family child care homes (net increase of 6 spaces per home); and
- $8,333 per space for school age care at existing schools.

- *Average: $12,325 per space across all types of care*.

If San Francisco were to have a higher proportion of new center spaces, the average cost per space would be higher. The total cost of new required child care facilities equals about $46.6 million, based on the above rates and distribution of spaces by facility type. Taking the average cost among these various types of care, however, is reasonable, given that the type of care that will actually be built is difficult to predict. This method reflects a reasonable estimate of what the City will build with the fee revenues given the distribution of demand by type of care, age, and the supply of existing types of child care. For instance, only a portion of small family child care homes can be assumed to be interested in or capable of expanding to large child care homes.

[19] These costs have been adjusted for inflation and expressed in 2006 dollars.

Table 10
Estimated Cost of Child Care Spaces by Type of Space and Age: 2006 to 2025
San Francisco Child Care Linkage Fee Nexus Study

Type of Facility or Program	Average Cost per Space by Facility Type	Birth to 2 or Infant	3 to 5 or Preschool	6 to 13 or School Age	Totals, 0 to 13 Years Old	Percents of Totals
Target Number of Spaces	*(see Table 8)*	498	1,923	1,358	3,780	
1. Build New Centers: Spaces		199	769	102	1,070	28.3%
Costs (1)	**$27,406**	$5,457,364	$21,085,657	$2,792,060	$29,335,081	63.0%
2. New Centers in Existing or New Commercial Space		50	192	102	344	9.1%
Costs (1)	**$13,703**	$682,170	$2,635,707	$1,396,030	$4,713,908	10.1%
3. Expand at Existing Centers: Spaces		75	289	34	397	10.5%
Costs (2)	**$13,703**	$1,023,256	$3,953,561	$465,343	$5,442,160	11.7%
4. New Small Family Child Care Homes: Spaces		100	385	272	756	20.0%
Costs (3)	**$500**	$49,782	$192,344	$135,836	$377,963	0.8%
5. New Large Family Child Care Home Spaces		50	192	136	378	10.0%
Costs (4)	**$1,429**	$71,118	$274,778	$194,052	$539,947	1.2%
6. Expand FCCH from 8 to 14: Spaces		25	96	34	155	4.1%
Costs (5)	**$3,333**	$82,971	$320,574	$113,197	$516,741	1.1%
7. School Age at Existing Schools		-	-	679	679	18.0%
Costs (6)	**$8,333**			$5,659,846	$5,659,846	12.1%
Total Spaces	**na**	498	1,923	1,358	3,780	100%
Total Costs	**na**	**$7,366,661**	**$28,462,621**	**$10,756,364**	**$46,585,646**	**100%**
Average Cost by Age Group	**na**	**$14,798**	**$14,798**	**$7,919**	**$12,325**	

Note: This matrix of child care spaces is derived by evaluating the current supply of spaces and estimating how many facilities might expand; based on past development of spaces and the demand for child care by age group, as determined by the consultant and DCYF.

(1) Based on actual project costs for 13 projects that have received some funding from the City of San Francisco's low-interest loan program for child care facilities (See Appendix Table B).
(2) Expansion is assumed to cost 50% of new child care center spaces.
(3) Assumes cost based on approximation of $4,000 to set up a new small family child care home for 8 children.
(4) Assumes cost based on approximation of $20,000 to set up a new large family child care home for 14 children. based on data from actual grant programs administered by the Child Care Development Fund and DCYF/LIIF (See Appendix Table E).
(5) Assumes cost based on approximation of $20,000 to expand from a small to a large family child care home. based on data from actual grant programs administered by the Child Care Development Fund and DCYF/LIIF (See Appendix Table E).
(6) Assumes $350,000 per portable serving 36 children on average for before- and after-school care.

Sources: City of San Francisco; LINCC; Brion & Associates.

Table 11 summarizes the new child care spaces and costs and shows the average number of spaces and costs per year over the study period or 2006 to 2025. As shown, infant and preschool spaces cost more on average than school age spaces. Over the 19-year period, on average, there will be an annual need for 26 infant spaces, 101 preschool spaces, and 71 school age spaces, or an overall total of about 199 per year. The average annual cost of these spaces would be approximately $2.6 million per year. In reality, new development will be higher or lower in any given year, and the actual child care needs would be more or less than the averages presented here.

Table 11
Summary of New Demand for Child Care and Costs 2006 to 2025
San Francisco Child Care Linkage Fee Nexus Study

Item		Child Care Demand - 2006 to 2025			
		Birth to 23 months or Infant	2 to 5 or Preschool	6 to 13 or School Age	Total Estimated Child Care Need in Spaces
Total New Demand from 2006 to 2025 for Child Care by Age		498	1,923	1,358	3,780
City's Target as % of Total	100%	498	1,923	1,358	3,780
Average Facility Cost per Space		$14,798	$14,798	$7,919	$12,325
Total Cost of Child Care Spaces (excluding administrative costs)		$7,366,661	$28,462,621	$10,756,364	$46,585,646
With Administrative Costs (5%)		$7,734,994	$29,885,752	$11,294,183	$48,914,928
Average No. of Spaces per Year	(1)	26	101	71	199
Average Cost per Year	(1)	$407,105	$1,572,934	$594,431	$2,574,470

(1) Assumes growth occurs evenly over the 2006 to 2025 period; in reality, development will be higher or lower in any given year.
Sources: City of San Francisco; Brion & Associates.

7. Child Care Requirements

Table 12 calculates demand for child care spaces by type of future residential development. Assuming the City will fund 100% of the future demand for child care, it will need to fund 2,271 spaces generated by residential demand. As discussed above under **Section 3**, single resident occupancy and senior units are not assumed to generate children by definition and are therefore not included; these units are expected to make up 2-3% of the total new dwelling units in the City through 2025. There will be 45,014 new residents who are expected to generate 5,186 children 0 to 13 years old. Of these children, 44%, or 2,271 children, are assumed to need licensed care based on the methodology discussed above. This amount of children will generate a need for a total of 247,551 square feet of new child care space of various types and about 170,333 square feet of outdoor space.

Based on State child care licensing requirements, new residential units would be required to provide the following amounts of indoor and outdoor child care space:

- Single Family: 19.1 square feet of indoor space and 13.2 square feet of outdoor space;
- Multi-Family 0 to 1 bedroom: 12.6 square feet of indoor space and 8.7 square feet of outdoor space; and
- Multi-Family 2+ bedrooms: 14.4 square feet of indoor space and 9.9 square feet of outdoor space.

The breakdown is based on the persons per household factors for each of these three types of residential units. The San Francisco Planning Department estimates slightly more than 40% of new multi-family units will be larger units with 2 or more bedrooms, based on the City's housing policy requirements for most of the areas with development potential within the City.

The child care space requirement varies slightly between single family and multi-family units, based on population density or persons per household per unit. The City forecasts about 95% of the new development to be multi-family units, which include apartments, condos, live/work units, lofts, and flats. This forecast is based on historical development patterns, current applications and proposed projects, and current zoning in the City (see **Appendix C: Table C**).

Table 12
Child Care Requirement for Residential Uses
San Francisco Child Care Linkage Fee Nexus Study

Item	Assumptions - Percents	Residential Uses: Total Residential Uses	Single Family Units	Multi-Family Units - 0-1 Bedrooms	Multi-Family Units - 2+ Bedrooms	SRO/Senior Units
Future Dwelling Units (w/out MB, RH, VV)		19,146	477	10,806	7,142	721
Persons Per Household Factors		2.35	3.50	2.30	2.63	1.16
Total Population	*See Table 1*	46,108	1,671	24,854	18,748	836
Percent Distribution		100%	4%	54%	41%	2%
Total Population Minus SR/SRO Population		45,273	1,671	24,854	18,748	
Percent Distribution		100%	4%	55%	41%	
Residents Needing Care Outside SF	*See Table 3*	(259)	(10)	(142)	(107)	
Future Population Subject to Fee		45,014	1,662	24,712	18,641	
Percent Distribution		100%	4%	55%	41%	
Estimated Total Children (1)	0.0%	5,186	191	2,847	2,148	
Children Needing Licensed Care (2)	43.8%	2,271	84	1,247	940	
City's Policy Target: % of Demand	100%	2,271	84	1,247	940	
Dwelling Units Subject to Fee		18,426	477	10,806	7,142	
Child Care Requirement in Sqft by Land Use (3)						
Building Space		247,551	9,138	135,901	102,512	
Outdoor Space		170,333	6,288	93,510	70,536	
Child Care Space Requirement per Unit (4)						
Building Space in Sqft		**13.4**	**19.1**	**12.6**	**14.4**	
Outdoor Space in Sqft		**9.2**	**13.2**	**8.7**	**9.9**	

Note: SRO and Senior units would be exempt from the child care fee as they do not generate children by definition.
However, it is true that children do occasionally live in SROs.

(1) See Table 8; children as % of total population citywide.

(2) See Table 8; represents average factor for all child care age groups.

(3) Assumes an average building sqft per space of 109 based on recent projects in San Francisco (See Appendix Table B)
and includes support space: halls, storage, restrooms, kitchen, etc. and the average sqft per space from recent San Francisco Projects
Assumes an average outdoor space sqft of 75 based on state licensing requirements.

(4) If less than 14 spaces for Residential project and 24 spaces for Commercial Projects are required by a "project" then the in-lieu fee would be levied;
otherwise a "project" could pay either the in-lieu fee or provide the child care spaces on or off-site,
with deed restrictions for a specified term, to be defined in the fee ordinance.

Sources: Brion & Associates.

The demand for child care spaces from non-residential uses is calculated in **Table 13** by type of land use, for a total of 1,509 child care spaces. The child care requirements for non-residential development are expressed as square feet of child care space per 1,000 square feet of non-residential space, as shown in **Table 13** and summarized below:

- Civic, Institutional, Educational: 10.8 square feet of indoor space and 7.5 square feet of outdoor space;
- Hotel: 6.1 square feet of indoor space and 4.2 square feet of outdoor space;
- Industrial: 7.0 square feet of indoor space and 4.8 square feet of outdoor space;
- Medical: 10.8 square feet of indoor and 7.5 square feet of outdoor space;
- Office: 10.8 square feet of indoor space and 7.5 square feet of outdoor space; and
- Retail: 8.1 square feet of indoor space and 5.6 square feet of outdoor space.

- *Average: 9.3 square feet of indoor space and 6.4 square feet of outdoor space*.

The space requirements vary by land use because the employment densities vary by land use. The higher the density, or the more employees per square foot, the greater the child care requirements for that land use. The density assumptions (square feet per employee) are shown in **Appendix B: Table A** and are from the San Francisco Planning Department.

For projects that 1) are too small to create demand for a reasonably sized child care project (under 14 spaces); 2) do not want to provide child care space directly; or 3) cannot provide child care onsite, giving them the option of paying a linkage fee, which is calculated based on the space requirements shown in **Tables 12** and **13**, is suggested. Thisapproach is consistent with the current child care fee program in the City. The proposed in-lieu or linkage fee rates are shown in **Tables 14** and **15**.

Table 13
Child Care Requirement for Non-Residential Uses
San Francisco Child Care Linkage Fee Nexus Study

Item		New Non-Residential Uses: Civic, Institutional, Education	Hotel-Motel	Industrial/PDR	Medical	Office	Retail	Total Non-Residential Space (Sq. Ft.)
Future Development: Sqft of Space	(1)	20,083	938,640	4,693,270	866,036	9,148,962	2,103,296	17,770,286
Child Care Space Demand	(2)	2	53	300	86	911	157	1,509
City's Policy Target: % of Demand	100%	2	53	300	86	911	157	1,509
Child Care Requirement in Sqft by Land Use	(3)							
Building Space		218	5,728	32,729	9,395	99,247	17,112	164,428
Outdoor Space		150	3,941	22,520	6,464	68,289	11,774	113,139
Child Care Space Requirement	(4)							
CC Building Space in Sqft per 1,000 Sqft		**10.8**	**6.1**	**7.0**	**10.8**	**10.8**	**8.1**	**9.3**
CC Outdoor Space in Sqft per 1,000 Sqft		**7.5**	**4.2**	**4.8**	**7.5**	**7.5**	**5.6**	**6.4**

(1) Based on projections by SF Department of City Planning (July 2006); See Appendix Table A.
The cost of non-resident employee child care demand is spread over all expected non-residential space as it is not possible to distinguish which space is used by resident employees versus non-resident employees.
(2) See Tables 5 and 6. Assumes that about 5% of employees need child care and of those, one child per employee, age 0 to 5.
(3) Assumes an average building sqft per space of 109 based on recent projects in San Francisco (See Appendix Table B) and includes support space: halls, storage, restrooms, kitchen, etc. and the average sqft per space from recent San Francisco Projects
Assumes an average outdoor space sqft of 75 based on state licensing requirements.
(4) If less than 14 spaces were required by a "project" then the in-lieu fee would be levied; otherwise a "project" could pay either the in-lieu fee or provide the child care spaces on- or off-site, with deed restrictions for a specified term, to be defined in the fee ordinance.
Sources: Brion & Associates.

Table 14

Potential Maximum Residential Child Care Linkage Fee by Type of Unit
San Francisco Child Care Linkage Fee Nexus Study

Item	Assumptions - Percents	Residential Uses: Total - Residential	Single Family Units	Multi-Family Units - 0-1 Bedrooms	Multi-Family Units - 2+ Bedrooms	SRO/Senior Units
Future Dwelling Units (w/out MB, RH, VV)		19,146	477	10,806	7,142	721
Persons Per Household Factors		2.35	3.50	2.30	2.63	1.16
Total Population	*See Table 1*	46,108	1,671	24,854	18,748	836
Percent Distribution		100%	3.6%	53.9%	40.7%	1.8%
Total Population Minus SR/SRO Population		45,273	1,671	24,854	18,748	
Percent Distribution		100%	3.7%	54.9%	41.4%	
Residents Needing Care Outside SF	*See Table 3*	(259)	(10)	(142)	(107)	
Future Population Subject to Fee		45,014	1,662	24,712	18,641	
Percent Distribution		100%	3.7%	55%	41.4%	
Estimated Total Children (1)	0.0%	5,186	191	2,847	2,148	
Children Needing Licensed Care (2)	43.8%	2,271	84	1,247	940	
City's Policy Target: % of Demand	100%	2,271	84	1,247	940	
Cost of Child Care by Land Use (3)		$27,992,479	$1,033,294	$15,367,388	$11,591,797	
Administrative Cost Factor (4)		$1,399,624	$51,665	$768,369	$579,590	
Total Child Care Costs		**$29,392,103**	**$1,084,959**	**$16,135,758**	**$12,171,386**	
Dwelling Units Subject to Fee		18,426	477	10,806	7,142	-
Potential Maximum Linkage Fee Per Unit		$1,519	$2,164	$1,422	$1,623	
Administrative Cost per Unit	5.0%	$76	$108	$71	$81	
Total Potential Maximum Linkage Fee per Dwelling Unit		**$1,595**	**$2,272**	**$1,493**	**$1,704**	**$0**

Note: SRO and Senior units would be exempt from the child care fee as they do not generate children by definition. However, it is true that children do occasionally live in SROs.

(1) See Table 8; children as % of total population citywide.
(2) See Table 8; represents average factor for all child care age groups.
(3) Assumes an average cost per space of $12,325 (see Table 11).
(4) Assumes an administrative cost factor of 5.0% of total costs for administration of child care fee fund.

Sources: Brion & Associates.

Table 15
Potential Maximum Non-Residential Child Care Linkage Fee by Land Use Category
San Francisco Child Care Linkage Fee Nexus Study

Item		New Non-Residential Uses: Civic, Institutional, Education	Hotel-Motel	Industrial/PDR	Medical	Office	Retail	Total Non-Residential Space (Sq. Ft.)
Future Development: Sqft of Space	(1)	20,083	938,640	4,693,270	866,036	9,148,962	2,103,296	17,770,286
Child Care Space Demand	(2)	2	53	300	86	911	157	1,509
City's Policy Target: % of Demand	100%	2	53	300	86	911	157	1,509
Cost of Child Care by Land Use (3)		$24,635	$647,654	$3,700,938	$1,062,325	$11,222,604	$1,935,011	$18,593,167
Administrative Cost Factor (4)		$1,232	$32,383	$185,047	$53,116	$561,130	$96,751	$929,658
Total Child Care Costs		$25,867	$680,037	$3,885,985	$1,115,442	$11,783,734	$2,031,761	$19,522,825
Potential Maximum Linkage Fee Per Sqft of Space		$1.23	$0.69	$0.79	$1.23	$1.23	$0.92	$1.05
Administrative Cost per Space	5.0%	$0.06	$0.03	$0.04	$0.06	$0.06	$0.05	$0.05
Potential Maximum Fee per Sqft of Development		**$1.29**	**$0.72**	**$0.83**	**$1.29**	**$1.29**	**$0.97**	**$1.06**

(1) Based on projections by SF Department of City Planning (July 2006).
The cost of non-resident employee child care demand is spread over all expected non-residential space as it is not possible to distinguish which space is used by resident employees versus non-resident employees.
(2) See Tables 5 and 6. Assumes that about 5% of employees need child care and of those, one child per employee, age 0 to 5.
(3) Assumes an average cost per space of $12,325 (see Table 11).
(4) Assumes an administrative cost factor of 5% of total costs for administration of child care fee fund.
Sources: Brion & Associates.

8. Proposed Maximum Child Care Linkage Fee by Land Use

The total estimated maximum residential child care linkage fees by land use are calculated in **Table 14** based on the average cost per space calculated in **Table 10**. Total costs of new required child care for residential uses equal $29.4 million, assuming an average cost per space of $12,325 and a 5% administration cost. Most of these costs, about $28.3 million, are estimated to be associated with multi-family development because the City is expected to add very few single family units. These proposed fee rates represent the maximum amount that the City could charge based on nexus. These maximum fee rates are comparable with child care fees in other locations as discussed in **Chapter II: Fee Comparisons**. Many of these fees have not been updated in a number of years and/or were adopted prior to the adoption of the Mitigation Fee Act.
In summary, other cities' current child care fees range from:

- $100 to $1,736 for a single family residence;
- $115 to $1,624 for a multi-family residence; and
- $0.01 to $1.15 per square foot for non-residential uses.

The proposed San Francisco child care residential linkage fees are as follows:

- Single Family: $2,272 per unit;
- Multi-Family 0 to 1 bedroom: $1,493 per unit; and
- Multi-Family 2+ bedrooms: $1,704 per unit.
- *Average: $1,595 per residential unit or $1.72 per square foot of residential development.*[20]

Table 15 calculates the maximum proposed non-residential linkage fee per square foot for non-residential land uses. The maximum fees range from $0.72 per square foot for hotel/motel uses to $1.29 per square foot for office, medical, and civic, institutional, educational. The cost of providing child care to non-resident employees that work in the City is divided by the total amount of expected gross building space by land use category to derive the non-residential linkage fees. The proposed fee rates are:

- Civic, Institutional, Educational: $1.29 per square foot of building space;
- Hotel/Motel: $0.72 per square foot of building space;
- Industrial: $0.83 per square foot of building space;
- Medical: $1.29 per square foot of building space;
- Office: $1.29 per square foot of building space; and
- Retail: $0.97 per square foot of building space.
- *Average:* $1.06 *per square foot of building space.*

[20] The residential development factor of $1.72 per square foot is for comparison purposes and assumes the average residential unit to be 925 square feet.

The total projected revenues funded by non-residential uses would equal $19.5 million over the 2006 to 2025 period, including 5% for administration. These maximum fees assume an estimated amount of new non-residential development that totals approximately 17.8 million new square feet of non-residential space over existing conditions, not including development approved at Mission Bay, Visitation Valley, and Rincon Hill (see **Appendix B**: **Table A**).

The amount of projected new development expected from 2006 to 2025 equals about 1.1 million square feet per year on average, of which about 605,000 square feet per year would be office space. These figures exclude non-residential space associated with Mission Bay, Rincon Hill and Visitation Valley as discussed elsewhere in the report. The City's Proposition M, which regulates office development in the City, allows for up to 875,000 square feet of office space per year. Even with the inclusion of the three project areas, the projected office development would total about 481,000 square feet per year, or within the Proposition M limit.

It should be noted that for those projects that choose to provide the child care space directly and not pay the linkage fee, the administrative fee would still need to be applied to cover the cost of the City's monitoring the project's mitigation.

It is important to understand that the methodology used to estimate child care demand and the maximum linkage fee requirement and fee rate is not dependent on the total overall amount of growth expected. With other types of impact fees, this may not be the case. For instance, if the City is trying to fund $100 million worth of needed traffic improvements, the fee rate would be derived by dividing the total costs by the expected growth in trips, after making allocation assumptions to each land use. Thus, a fixed cost is allocated over a certain amount of growth to derive the fee rate. In this example, if the growth is less, the City would receive less money than needed or the fee rate would have to be increased to reflect lower growth.

With child care, we calculated the child care need per one new dwelling unit or per employee and applied an average cost per child care space to that demand to derive the maximum fee rates by land use. If actual growth is lower than analyzed in this report, the child care fee revenue generated will be less than estimated, but the child care fee rate would remain the same. The analysis does not presume some fixed amount of child care facilities that are needed independent of growth and then allocate those costs over the new growth as with other types of impact fees. The methodology presumes a bottom-up approach to derive child care costs or facility needs. Thus, if growth is less than analyzed herein, then child care demand would be commensurate with the amount of child care fee revenue collected.

It is important to note that the Department of Children, Youth, and Their Families proposes that each land use would pay the proposed fee rate listed in the **Tables 14** and **15**, unless the new development could not be categorized into one of these categories. In that situation, the average fee would apply respectively to residential or non-residential

uses. In total, it is assumed that the new child care fee will generate over $46.6 million (plus administrative costs) to San Francisco over the next 19 years (through 2025) assuming development occurs as projected. If development is less than projected, the child care fee revenue collected will also be less, but demand for child care will be less as well.

9. Linkage Fee Implementation

This section discusses potential funding mechanisms the City of San Francisco could adopt to implement the Child Care Linkage Fee Program and other policy and implementation issues discussed in this report.

Proposed Funding Mechanisms for Fee Program

The expected development linkage fee revenue (i.e., $48.9 million[21]) could be allocated to a variety of "funding mechanisms" the City could adopt to provide for new child care, which are discussed below. Should the child care fee be updated as proposed, the Board of Supervisors would set the priorities, choose the funding mechanisms, and the amounts allocated to each mechanism during the annual review of the fee program with input from the Department of Children, Youth, and Their Families. The City's current Child Care Facilities Fund, which is administered by the Low Income Investment Fund, provides a variety of funding mechanisms and programs as outlined below. With the additional funding that would be generated by this fee update, the dollar amounts available for new child care would increase. These include, but are not limited to, the following:

1. **Direct City Funding** of new projects through joint development agreements with developers, non-profit providers/agencies, or City contributions towards private projects. This type of funding would include additional requirements concerning affordability and access to spaces. The City is not expected to build and own any child care facilities outright, except perhaps those developed through the Recreation and Park Department's programs.

2. **Low-Interest Loans** to new or existing child care providers/facilities. There are a few options here. The first is a straight low-interest loan, with no special requirements. The second option includes a low interest loan with certain requirements or restrictions. For instance, there could be a payment waiver clause: if new spaces eligible to very low income children are created and maintained, then no loan payment would be required; however, if the provider eliminates the low income spaces, the loan repayment would become due. With low interest loans, the revenue would be used to create a revolving loan fund that would regenerate itself though the low interest charged on the loans.

3. **No-Interest Loans** with income/profit limits similar to those required to qualify for housing loan funds. These funds could be offered to existing child care providers at risk of going out of business because they are losing their space or to providers that will provide infant care, subsidized care, or spaces for children with special needs, assuming they expand their facilities.

[21] This includes the administrative costs at 5% of total fee revenue through the year 2025.

4. **Grants with Matching Requirements** to new or existing child care providers. These funds would be available if the project provides infant care along with other age groups. To the extent that providers find additional monies or grants for expanding or creating new child care spaces, these spaces would count toward the City's existing need for spaces.

5. **Outright Grants** could be available to new or existing providers that provide spaces for children with special needs and/or new subsidized spaces. However, conditions and restrictions should be placed on the child care provider that receives outright grants to ensure that not only are new spaces being provided, but other goals of the City are being met also.

The amount of money allocated to each of these funding mechanisms would be in proportion to the amount of revenue needed to put each mechanism into operation. Revolving loan funds would generate interest and the revenue would be returned to the fund; thus, less revenue would be allocated to this option. Outright grants and the provision of new centers would be more costly, and more revenue should be allocated to these mechanisms. The ultimate allocation formula should be one that maximizes the provision of new spaces with the least cost to the overall program.

10. Use of Potential Child Care Linkage Fee Revenue

The $48.9 million estimated to be generated by the Child Care Linkage Fee will accrue through 2025. In the first few years, the City will need to establish a priority list for the above funding mechanisms. Not all of the mechanisms will be created immediately. A special Child Care Linkage Fee Fund will need to be created so that the funds can be kept separately, and any interest earned on the fee revenue will become part of the fee fund. Up to 5% of the total fee amount collected from a project would be set aside for administration of the fee program.

Once a sufficient amount of fee revenue has been generated to construct a project, the City will need to determine how it will participate in the project. If development were to occur equally over the next 19 years, the City would receive about $2.6 million per year in child care linkage fee revenue. In reality, real estate development varies year to year in business cycles, and the amount of fee revenue collected in any given year will vary. These are a few of the potential options available to the City:

1. The City currently contracts with the Low Income Investment Fund to manage the child care fee fund. The City could continue to work with the Low Income Investment Fund to manage and implement the program.

2. The City could partner with other child care agencies and non-profits for one of their child care projects.

3. The City could team with a local provider or developer that wants to build a new center and apply the revenue toward the project.

4. The City could issue a Request for Proposals to child care providers and developers that are interested in building a new center or expanding an existing center.

5. The City could develop a grant and low-interest loan program for providers in need of funding to create new child care facilities.

Appendix A: Summary of Child Care Demand Factors from Recent Child Care Studies

Appendix A
Table 1
Summary of Child Care Demand Factors
San Francisco Child Care Linkage Fee Nexus Study

#	Study Name and Location	Residential/Population Demand					Employment Demand Factors	Other Demand Factors/Comments
		Licensed Care by Age Group (1)				Labor Force Participation Rates		
		0-1 years	2-5 years	6-9 years	10-13 years			
1	*Child Care Master Plan, City of Santa Monica, June 1991*. Prepared by Moore Iacofano Goltsman, Inc.	40%	64%	59%	59%	56% under 6 and 73% over 6	na	Study breaks down ages from 0-2 years, 3-4 years, and 5-14 years.
2	*Child Care Linkage Program, City of Santa Monica, November 2005*. Prepared by Keyser Marston Associates, Inc.						Assumes 14% of employees have children who demand child care in the City.	Fee applies to non-residential uses only.
3	*A New Assessment of Child Care Need for Children Age 5 and Under in Santa Clara County*, Sponsored by FIRST 5 Santa Clara County and prepared by International Child Resource Institute, September 2002.	29% Center-based care, 8% FCCH; 37% total	29% Center-based care, 8% FCCH; 37% total	na	na	na	na	Study looks only at children ages 0 to 5 years old.
4	*City of Alameda Child Care Needs*, February 2003 and County of Alameda *Meeting the Child Care Needs of Alameda County's Children*, February 2002, prepared by Berkeley Policy Associates. (2)	16%	33%	51%	51%	63% of families with children are considered "working" families where both parents or a single parent work.	na	The study employs a Conservative Demand Estimate and Broad Demand Estimate. Figures shown here are for the Conservative Demand Estimate which does not assume that every "working" family requires licensed care.
5	*Who's Minding the Kids? Child Care Arrangements: Winter 2002.* Issued October 2005 by the U.S. Census Bureau based on the Survey of Income and Program Participation (SIPP).	24.2% in organized care; 6.2% FCCH. (3)	24.2% in organized care; 6.2% FCCH. (3)	5% in organized care; 5% in FCCH/ 16% in after-school enrichment programs.	5% in organized care; 5% in FCCH/ 16% in after-school enrichment programs.	Doesn't discuss LFPR.	na	This study is based on data from the Survey of Income and Program Participation (SIPP) which is collected by the U.S. Census.

Appendix A
Table 1
Summary of Child Care Demand Factors
San Francisco Child Care Linkage Fee Nexus Study

#	Study Name and Location	Residential/Population Demand: Licensed Care by Age Group (1) 0-1 years	2-5 years	6-9 years	10-13 years	Labor Force Participation Rates	Employment Demand Factors	Other Demand Factors/Comments
6	*Methodology: Child Care Demand,* from Tompkins County, NY, www.daycarecouncil.org (3)	47%-69%	47%-69%	na	na	na	na	This study looks at children under age 6 who require care and summarizes results from four other studies which looked at demand.
7	*Primary Child Care Arrangements of Employed Parents: Findings from the 1999 National Survey of America's Families* , 2002, The Urban Institute.	73%	73%	80%	80%	na	na	These percentages refer to the number of children receiving care, both licensed and unlicensed.
8	*The Demand and Supply of Child Care in 1990* , Joint Findings of the National Child Care Survey 1990 and A Profile of Child Care Settings , 1991.	na	na	na	na	The report finds that 83% of children 0 to 5 years old have working parents, which is much higher than labor force participation rates we have found.	na	No demand estimates are stated.
9	*Linking Development and Child Care: A Toolkit for Developers and Local Governments* , 2005, Prepared for Local Investment in Child Care (LINCC) by Bay Area Economics. Mission Bay Project Only	29.9% for center-based care and 12.6% for FCCH care	29.9% for center-based care and 12.6% for FCCH care	na	na	Does not appear to use LFPRs.	na	This study also looks at employee demand, which most studies do not consider.
10	*Survey of Parents/Guardians and Childcare Providers* , January 2006, Conducted for the City of San Jose and the San Jose Public Library, by Godbe Research.	28%	28%	na	na	This is a survey of actual use patterns and not an estimate of demand, therefore LFPRs are irrelevant.	na	Overall, 43% of respondents said that they used child care, but that included care provided by anyone who was not the parent/guardian.

Appendix A
Table 1
Summary of Child Care Demand Factors
San Francisco Child Care Linkage Fee Nexus Study

#	Study Name and Location	Residential/Population Demand: Licensed Care by Age Group (1) 0-1 years	2-5 years	6-9 years	10-13 years	Labor Force Participation Rates	Employment Demand Factors	Other Demand Factors/Comments
11	*Child Care and Housing Linkage Research Study* , June 2003, Prepared for the County of San Mateo Office of Housing in conjunction with the San Mateo Child Care Coordinating Council, by Brion & Associates with Vernazza Wolfe, Inc.	75%	100%	38%	25%	LFPRs vary by community area.	na	This study looks at a variety of policies and programs that can be implemented in order to increase the supply of child care at the same time new housing is developed.
12	*Kern County Child Care Policy Analysis and Strategy Study* , October 2005, prepared by Brion & Associates.	37%	50%	50%	25%	LFPRs vary by community area.	na	
13	*City of Palm Desert Child Care Facilities Impact Fee Nexus Study* , August 2005, prepared by Brion & Associates.	37%	80%	50%	25%	53% for children under the age of 6 years and 59% for children over 6 years old.	Assumes that 5% of employees who work in Palm Desert have children ages 0-5 years old who need child care in Palm Desert. Spaces are split 50-50 between infant and preschool.	This study looks at both residential and employment demand, although a fee was only established for non-residential development, as requested by the City.
14	*City of South San Francisco Child Care Facilities Impact Fee Nexus Study* , September 2001, prepared by Brion & Associates.	100%	100%	100%	100%	na	5% of employees are expected to require child care in South San Francisco.	Data was taken directly from the then current Needs Assessment, which assumed 100% of children with working parents needed licensed care. The city however targeted 50% of this figure because it felt that some parents desire and use unlicensed care.
15	*PROPOSED Alameda County Child Care In-Lieu Fee Study,* May 2007, prepared by Brion & Associates.	37%	75%	38%	38%	60% for children under the age of 6 years and 66% for children over 6 years old.	Estimates that 5% of employees have children who require care near place of work	Study looks at unincorporated areas of Alameda County and calculates demand for both residential and non-residential uses.

(1) Represents demand for licensed care of children with working parents; and not the percentage of total children unless otherwise stated.
(2) The City of Alameda based their child care needs assessment on the study done for Alameda County in 2002; therefore their demand factors are the same.
(3) Organized care includes day care center, nursery or preschool, or Head Start/school programs.
Source: Compiled by Brion & Associates.

Appendix B: Child Care Model Background and Detailed Supporting Data

Prepared by Brion & Associates

Appendix B: Table A
Development Projections
for Non-Residential Uses
San Francisco Child Care
Linkage Fee Nexus Study

Land Use	Existing Conditions 2006 (1)			Future Jobs - 2006 to 2025 (2)			Total Jobs at 2025		
	Estimated Jobs - 2006	2006 Jobs in Mission Bay/Rincon Hill/Visitation Valley (4)	Net Jobs 2006 (w/out MB, RH, VV)	Total Projected New Jobs -2006-2025	Mission Bay / Rincon Hill/Visitation Valley Growth (4)	Net New Jobs Subject to Fee - 2006-2025 (w/out MB, RH, VV)	Total Projected Jobs at 2025	Total Jobs in Mission Bay/Rincon Hill/Visitation Valley at 2025 (4)	Total Net Jobs at 2025 (w/out MB, RH, VV)
				a	*b*	*c*			
Non-Res. Development									
CIE	94,127	2,107	92,019	4,442	4,353	89	98,568	6,460	92,108
Hotel	18,761	16	18,745	2,347	0	2,347	21,107	16	21,091
Medical	36,772	52	36,720	3,855	6	3,849	40,627	58	40,569
Office	225,676	18,100	207,576	51,122	10,460	40,662	276,798	28,561	248,238
Retail	97,205	5,186	92,019	8,297	1,286	7,011	105,502	6,472	99,030
Industrial/PDR	63,684	2,519	61,165	13,744	335	13,409	77,429	2,854	74,575
TOTAL/AVG.	**536,224**	**27,981**	**508,243**	**83,807**	**16,440**	**67,367**	**620,031**	**44,421**	**575,610**
Avg. Per Yr - 2006 to 2025				**4,411**	**865**	**3,546**		**(5)**	**(5)**

(1) Land use categories and base data are from the San Francisco Department of City Planning (October 2006).
Data from 2006 is extrapolated from the 2000 to 2025 projections, based on average annual growth rates by land use category.

(2) New job growth is from Moody's Economy.com forecast for San Francisco, 2006 to 2025.

(3)
Based on typical new sqft per employee factors derived by reviewing proposed projects and actual projects in SF and other Silicon Valley cities by Brion & Associates.

The sqft per employee factors that exist currently are lower density factors than those used for the future analysis. It is assumed that in the future employees will use less sqft than they use currently.

(4) Visitation Valley, Rincon Hill and Mission Bay would not be subject to the new impact fee and the remaining square footage of development potential associated with these projects is removed for the analysis.

(5) The totals above are off by one job from the totals in Table 1 due to rounding.

(6) This amount of expected office space development would be within the limits of that allowed by Proposition M, which restricts office development to 875,000 sqft per year. There is also an accumulation of 2.2 million sqft credit that can also be developed.

Sources: Moody's Economy.com; San Francisco Department of City Planning; David Taussig & Associates, Inc.; Brion & Associates.

Appendix B: Table A
Development Projections
for Non-Residential Uses
San Francisco Child Care
Linkage Fee Nexus Study

Land Use	Estimated Sqft in 2006	Future Average Sqft per Employee (3)	Projected New Sqft-2006-2025 (2)		Mission Bay / Rincon Hill/Visitation Valley Growth (3)	Net Development Potential Subject to Fee - 2006-2025	Total Sqft of Bldg. Space at 2025	Total at 2025 w/out MB,RH,VV
	d	*e*	*a * e = f*		*b * e = g*	*f - g =h*	*d + f = i*	
Non-Res. Development								
CIE	19,295,974	225	999,400		979,317	20,083	20,295,373	18,841,873
Hotel	7,279,093	400	938,640		-	938,640	8,217,733	8,211,333
Medical	10,810,895	225	867,404		1,368	866,036	11,678,298	11,665,248
Office	90,270,440	225	11,502,528	(6)	2,353,565	9,148,962	101,772,968	95,346,846
Retail	31,494,307	300	2,489,072		385,776	2,103,296	33,983,378	32,041,778
Industrial/PDR	30,186,311	350	4,810,529		117,259	4,693,270	34,996,840	33,998,001
TOTAL/AVG.	**189,337,019**		**21,607,571**		**3,837,285**	**17,770,286**	**210,944,590**	**200,105,080**
Avg. Per Yr - 2006 to 2025			**1,137,241**		**201,962**	**935,278**		

Appendix B: Table B
Summary of Recent Child Care
Projects with City Funding
San Francisco Child Care Linkage Fee Nexus Study

LO	Loan #	Borrower	SPONSOR	Project Name	Project Costs	Costs Adjusted for Inflation per CPI for Region (1)	Square footage	Square footage cost	Inflation Adjusted Square Footage Cost	Total Child Care Spaces
BP	10288-14	San Francisco Women's Centers, Inc.	San Francisco Women's Centers, Inc.	SAN FRANCISCO WOMEN'S CENTER	$333,457	$398,070	1,485	$225	$268	23
BP	10297-14	Housing Services Affiliate Of The Bernal Heights Neighborhood Center	Housing Services Affiliate Of The Bernal Heights Neighborhood Center	THE FAMILY SCHOOL	$213,568	$247,654	2,600	$82	$95	23
BP	10299-14	Frandelja Enrichment Center	Frandelja Enrichment Center	FRANDELJA ENRICHMENT CENTER	$716,104	$842,452	6,700	$107	$126	40
DL	10300-14	1st Place 2 Start	Family Service Agency Of San Francisco	1ST PLACE 2 START	$335,026	$397,466	1,530	$219	$260	40
DL	10295-14	Wu Yee Children's Services	Wu Yee Children's Services	CHINATOWN EARLY HEAD START	$1,382,290	$1,659,536	6,700	$206	$248	40
DL	10296-14	Portola Family Connection Center, Inc.	Portola Family Connection Center, Inc.	PORTOLA FAMILY CONNECTION	$1,396,280	$1,642,636	7,500	$186	$219	63
DL	10311.02-14	Compass Community Services	Compass Community Services	TENDERLOIN CHILD CARE CENTER	$3,855,900	$4,450,496	11,277	$342	$395	63
BP	10310.02-14	Mission Neighborhood Centers, Inc	Mission Neighborhood Centers, Inc	ORLANDO CEPEDA PLACE CHILDREN'S CENTER	$1,042,313	$1,137,903	6,900	$151	$165	40
BP	10351.02-14	Coleman Children And Youth Services (dba Coleman Advocates For Children & Youth)	Coleman Children And Youth Services (dba Coleman Advocates For Children & Youth)	JEAN JACOBS CHILDCARE CENTER	$1,018,859	$1,124,240	6,700	$152	$168	40
BP	10298-14	899 Guerrero Street, Inc.	Catholic Charities Diocese Of San Diego	ST. JOSEPH'S VILLAGE	$1,547,700	$1,925,032	5,000	$310	$385	121
DL	10304-14	Visitacion Valley Community Center	Visitacion Valley Community Center	HERITAGE HOMES CHILDREN'S CENTER	$634,323	$698,468	3,414	$186	$205	44
DL	10303.02-14	Visitacion Valley Community Center	Visitacion Valley Community Center	JOHN KING CHILD AND FAMILY	$1,030,000	$1,136,533	3,518	$293	$323	42
DL	10324.02-14	Cross Cultural Family Center	Cross Cultural Family Center	ONE CHURCH CHILD DEVELOPMENT CENTER	$868,918	$947,624	2,775	$313	$341	27
Totals, All Projects					**$14,374,738**	**$16,608,111**	**66,099**	na	na	**606**
Averages, All Projects					**$1,105,749**	**$1,277,547**	**5,085**	**$213**	**$246**	**47**

(1) For CPI factors see http://data.bls.gov/PDQ/servlet/SurveyOutputServlet?data_tool=dropmap&series_id=CUURA422SA0,CUUSA422SA0
Sources: Low Income Investment Fund - San Francisco; Brion & Associates.

Appendix B: Table B
Summary of Recent Child Care
Projects with City Funding
San Francisco Child Care Linkage Fee Nexus Study

LO	Loan #	Borrower	Average Cost per Space in 2006 $$	Average Sqft per Child Care Space	Type of Child Care Slots	Loan closing dates	CPI Index (1)	Change in CPI to August 2006 (1)	% Change
BP	10288-14	San Francisco Women's Centers, Inc.	$17,307	65	23 Preschoolers	2/1/2000	176.5	34.2	19.4%
BP	10297-14	Housing Services Affiliate Of The Bernal Heights Neighborhood Center	$10,768	113	23 Preschoolers	8/23/2000	181.7	29	16.0%
BP	10299-14	Frandelja Enrichment Center	$21,061	168	8 infant, 8 toddler, 18 Preschoolers, 8 SA = 40	5/25/2000	179.1	31.6	17.6%
DL	10300-14	1st Place 2 Start	$9,937	38	8 infant, 8 toddler, 18 Preschoolers, 8 SA = 40	3/28/2000	177.6	33.1	18.6%
DL	10295-14	Wu Yee Children's Services	$41,488	168	8 infant, 8 toddler, 18 Preschoolers, 8 SA = 40	1/13/2000	175.5	35.2	20.1%
DL	10296-14	Portola Family Connection Center, Inc.	$26,074	119	18 Preschooler, 45 school age = 63	5/4/2000	179.1	31.6	17.6%
DL	10311.02-14	Compass Community Services	$70,643	179	27 infant toddlers, 36 preschool =63	9/28/2000	182.55	28.15	15.4%
BP	10310.02-14	Mission Neighborhood Centers, Inc	$28,448	173	40 pre-school	4/19/2002	193	17.7	9.2%
BP	10351.02-14	Coleman Children And Youth Services (dba Coleman Advocates For Children & Youth)	$28,106	168	40 pre-school	1/25/2002	190.95	19.75	10.3%
BP	10298-14	899 Guerrero Street, Inc.	$15,909	41	21 infants, 28 toddlers, 48 preschool, 24 school age = 121 total	2/1/1999	169.4	41.3	24.4%
DL	10304-14	Visitacion Valley Community Center	$15,874	78	20 infants & toddlers, 24 Preschooler=44 total	9/3/2001	191.35	19.35	10.1%
DL	10303.02-14	Visitacion Valley Community Center	$27,060	84	18 infant toddlers, 24 preschoolers =42 total	1/7/2002	190.95	19.75	10.3%
DL	10324.02-14	Cross Cultural Family Center	$35,097	103	27 infant toddlers	6/28/2002	193.2	17.5	9.1%
Totals, All Projects			na	na					
Averages, All Projects			**$27,406**	**109**					

Appendix B: Table C
Historical and Current Housing Unit Development in San Francisco by Type of Unit
San Francisco Child Care Linkage Fee Nexus Study

Year	All SF	MF 2 unit	MF 3-9 unit	MF 10-19 unit	MF 20+ unit	Total Units		Sr/SRO Units	SF Units	MF Units	Total Units
HISTORIC											
produced 2001	73	108	297	249	892	**1,619**		61	73	1,485	**1,619**
	5%	7%	18%	15%	55%	100%		4%	5%	92%	100%
produced 2002	59	134	358	230	1,479	**2,260**	=	61	59	2,140	**2,260**
	3%	6%	16%	10%	65%	100%		3%	3%	95%	100%
produced 2003	67	104	176	152	2,231	**2,730**	=	62	67	2,601	**2,730**
	2%	4%	6%	6%	82%	100%		2%	2%	95%	100%
produced 2004	55	84	91	120	1,430	**1,780**	=	65	55	1,660	**1,780**
	3%	5%	5%	7%	80%	100%		4%	3%	93%	100%
CURRENT	**SF**	**2 unit**	**3-9 unit**	**10-19 unit**	**20+ unit**						
authorized 2005	82	50	32	172	5,235	**5,571**					
	1%	1%	1%	3%	94%	100%					
produced 2005	46	38	117	38	1,633	**1,872**	=	235	46	1,591	**1,872**
	2%	2%	6%	2%	87%	100%		13%	2%	85%	100%
Average Produced 2001 to 2005	60	94	208	158	1,533	2,052		97	60	1,895	2,052

RECOMMENDED DISTRIBUTION FOR GROWTH 2006 TO 2025

	Sr/SRO	SF	MF	Total
Average (past 4yrs)	5%	3%	92%	100%
Recommended	3%	2%	95%	100%
Housing Distribution	735	490	23,280	24,505

** Note: All numbers from San Francisco Planning Department: '01-04 numbers from Housing Inventory 2001-2004 published July 2005, and '05 numbers from Housing Inventory 2005 pending*

Sources: San Francisco Planning Department; Brion & Associates.

Appendix B: Table D
San Francisco Growth Forecast by Age, 0 to 13 and Total Population (1)
Department of Finance P-3 Reports
San Francisco Child Care Linkage Fee Nexus Study

Age	2000 Total	Children as % of Pop.	2006 Total	Children as % of Pop.	2010 Total	Children as % of Pop.	2015 Total	Children as % of Pop.	2020 Total	Children as % of Pop.	2025 Total	Children as % of Pop.	Averages 2010-2025
0	7,224	0.9%	9,287	1.2%	8,929	1.1%	6,273	0.8%	4,830	0.6%	4,773	0.6%	
1	6,398	0.8%	8,872	1.1%	9,281	1.1%	6,868	0.8%	4,892	0.6%	4,737	0.6%	
2	5,927	0.8%	8,372	1.0%	9,408	1.2%	7,454	0.9%	4,974	0.6%	4,698	0.6%	
3	5,993	0.8%	8,026	1.0%	9,334	1.1%	7,953	1.0%	5,190	0.6%	4,671	0.6%	
4	5,844	0.7%	8,013	1.0%	9,067	1.1%	8,354	1.0%	5,577	0.7%	4,666	0.6%	
5	5,963	0.8%	8,393	1.0%	8,638	1.1%	8,714	1.1%	6,065	0.7%	4,691	0.6%	
6	5,974	0.8%	7,181	0.9%	8,132	1.0%	9,055	1.1%	6,647	0.8%	4,746	0.6%	
7	5,970	0.8%	6,327	0.8%	7,778	1.0%	9,175	1.1%	7,226	0.9%	4,825	0.6%	
8	6,127	0.8%	5,842	0.7%	7,748	0.9%	9,095	1.1%	7,717	0.9%	5,040	0.6%	
9	6,087	0.8%	5,905	0.7%	8,111	1.0%	8,816	1.1%	8,104	1.0%	5,425	0.7%	
10	6,220	0.8%	5,754	0.7%	6,898	0.8%	8,393	1.0%	8,469	1.0%	5,920	0.7%	
11	6,116	0.8%	5,920	0.7%	6,074	0.7%	7,907	1.0%	8,829	1.1%	6,518	0.8%	
12	6,066	0.8%	6,015	0.8%	5,650	0.7%	7,595	0.9%	8,991	1.1%	7,126	0.9%	
13	5,897	0.8%	6,048	0.8%	5,785	0.7%	7,617	0.9%	8,961	1.1%	7,653	0.9%	
Total 0-13	85,806	11.0%	99,955	12.5%	110,833	13.6%	113,269	13.7%	96,472	11.8%	75,489	9.3%	
0-1	13,622	1.7%	18,159	2.3%	18,210	2.2%	13,141	1.6%	9,722	1.2%	9,510	1.2%	1.5%
2-5	23,727	3.0%	32,804	4.1%	36,447	4.5%	32,475	3.9%	21,806	2.7%	18,726	2.3%	3.3%
6-13	48,457	6.2%	48,992	6.1%	56,176	6.9%	67,653	8.2%	64,944	7.9%	47,253	5.8%	7.2%
Total 0-13	85,806	11.0%	99,955	12.5%	110,833	13.6%	113,269	13.7%	96,472	11.8%	75,489	9.3%	12.1%
Total Population	781,174	100.0%	800,244	100.0%	816,230	100.0%	825,614	100.0%	820,545	100%	810,595	100%	

(1) The actual numbers of children and total population from DOF is not used in the analysis but rather the relationships between children and total population.
The percentages calculated above are applied to the City Planning Department's forecast of population growth.
Sources: California Department of Finance; Brion & Associates.

Appendix B: Table E
Cost of Family Child Care Home Expansions Funded with Existing Child Care Fee Grants
San Francisco Child Care Linkage Fee Nexus Study

Project & Year	Project Budget	Grant/Loan Amount	Slots Created	Slots Enhanced	Slots Preserved	Total Slots	Cost per Space	Notes
FY 04								
#04-1	$4,434	$3,500	5		7	12	$887	Purchase of sprinkler heads for Large FCC Fire Regulations
#04-2	$27,500	$12,500	6	8		14	$4,583	Permits and Sprinkler System for Expansion-includes $15,000 below for Fire Clearance
FY06 Subtotal	***$31,934***	***$16,000***	***11***	***8***	***7***	***26***	*$2,903*	
FY 05								
#05-1	$15,159	$4,500	6	7		13	$2,527	Purchase of equipment to meet the needs of larger group of children following expansion.
#05-2	$20,000	$6,000	6	6		12	$3,333	Creation of a second exit to obtain fire clearance for expansion
#04-2*R		$4,500	R	R		R		Replacement of electric garage door with manually operated door in order to receive fire clearance for expansion
FY05 Subtotal	***$35,159***	***$15,000***	***12***	***13***	***0***	***25***	*$2,930*	
FY 06								
#06-1	$15,082	$15,000	5		7	12	$3,016	To buy equipment and renovate first floor to meet Licensing and Fire Department requirements for expansion
FY06 Subtotal	***$15,082***	***$15,000***	***5***	***0***	***7***	***12***	*$3,016*	
	$82,175	***$46,000***	***28***	***21***	***14***	***63***	***2,935***	
	$20,544	***$11,500***						

*R = Repeated - provider received a previous grant, slots not counted to avoid duplicates

Sources: Local Income Investment Fund, Child Care Capital Facilities Fund; Brion & Associates.

Appendix B: Table F
Number of Children and Total Population for Mission Bay, Rincon Hill and Visitation Valley for 2006 and 2006 to 2025
San Francisco Child Care Linkage Fee Nexus Study

San Francisco		Total Population All Ages		Population by Age (1) 0 to 24 Mos. (infants)	2 to 5 (preschool)	6 to 13 (school age)	Total 0-13
Children as of 2006 (only MB, RH, VV)							
Children as % of Population by Age Group (1)				2.3%	4.1%	6.1%	12.5%
Total Population at 2006 (2)		16,448		373	674	1,007	2,054
Total Estimated Employed Residents in City	41%	6,819	(3)				
SF Employed Residents Working Outside SF (5)	23%	1,573					
Those Needing Child Care Outside SF (5)	5%	199	(4)	99	99		
Net Residents		16,249					
Estimated Children at 2006 (5)				**274**	**575**	**1,007**	**1,856**
New Children 2006-2025 (only MB, RH, VV)							
Children as % of Population by Age Group (6)				1.5%	3.3%	7.2%	12.1%
Net New Population		9,763					
Senior and SRO Population		195					
Net Population with Children		9,568					
Estimated Children of New Residents				148	320	689	1,157
New Employed Residents (7)	50%	4,767					
New Employed Residents Working Outside SF	23%	1,100					
Those Needing Child Care Outside SF (5)	5%	55		27	27		55
Net New Residents Possibly Needing Care		9,513					
Net New Children 2006 to 2025				**120**	**292**	**689**	**1,102**
Total Children at 2025 (only MB, RH, VV)	(8)						
Total Population		26,211					
Senior and SRO Population		786					
Net Population with Children		25,425					
Children as Percent of Total Population at 2025				1.2%	2.3%	5.8%	9.3%
Estimated Children of New Residents				298	587	1,482	2,368
New Employed Residents	50%	12,667					
New Employed Residents Working Outside SF	23%	2,922					
Those Needing Child Care Outside SF (5)	5%	146		73	73		146
Total Residents Possibly Needing Care		25,279					
Total Children 2025				**225**	**514**	**1,482**	**2,222**

(1) Based on the percent of children by age group for San Francisco from DOF P-3 Report and applied to DCP's estimate of existing population as of 2006 (See Appendix Table D).
(2) For Mission Bay, Rincon Hill and Visitation Valley areas only.
(3) Based on Employed Residents as percent of total population as of 2000 Census and this rate times 2006 Population estimate.
(4) Based on non-resident employee demand for child care in SF. See Table 6.
(5) Based on Journey to Work data - see Table 5 and Table 6.
(6) Based on total population as estimated times the average percentage of children per age group from above.
(7) Based on forecasts of Employed Residents at 2025 by ABAG.
(8) Note that the analysis for 2025 is based total population at 2025 and includes Mission Bay, Rincon Hill and Visitation Valley to provide an estimate of total demand for child care; these figures are not used in the impact fee calculations but rather for information of total future conditions.

Sources: California Department of Finance; SF City Planning Department; Brion & Associates.

Appendix B: Table G
Future Demand for Child Care for Mission Bay, Rincon Hill, and Visitation Valley: 2006 to 2025
San Francisco Child Care Linkage Fee Nexus Study

Future Growth - 2006 to 2025		New Population & Employment	% Distribution	New Child Care Demand by Age: Birth to 24 Mos. or Infant	2 to 5 or Preschool	6 to 13 or School Age	Total. 0 to 13 Years Old
Future Child Care Need							
New Population with Children - 2006 to 2025	(1)	9,513	*(see Table 3)*				
Resident Children Potentially Needing Care							
Estimated Number of Children by Age	(2)	*(see Table 3)*		120	292	689	1,102
Average Labor Force Participation Rates	(3)			57.6%	57.6%	63.2%	
Children With Working Parents				69	168	436	674
% Children Needing Licensed Care	(4)			37%	100%	66%	72%
Children Needing Licensed Care				26	168	289	483
Percent of Children by Age Needing Care				21%	58%	42%	44%
Non-Resident Employee's Children Needing Care	(5)			205	616		822
Distributed by Land Use Category							
Civic, Institutional, Education		4,353	26%	54	163	-	218
Hotel-Motel		-	0%	-	-	-	-
Industrial/PDR		6	0%	0	0	-	0
Medical		10,460	64%	131	392	-	523
Office		1,286	8%	16	48	-	64
Retail		335	2%	4	13	-	17
Total Future Employee Demand for Child Care		16,440	100%	205	616	-	822
Total New Demand for Child Care Spaces				**231**	**785**	**289**	**1,305**
Percent Distribution				18%	60%	22%	100%

(1) Represents population associated with Mission Bay, Rincon Hill and Visitation Valley.
(2) Based on the estimated average number of children by age categories for 2010 to 2015 for San Francisco from CA Dept. of Finance P-3 Report and applied to City Planning Department's estimate of expected new population between 2006 and 2025.
(3) Labor force participation rates are from the 2000 Census and include children with two working parents or single working parents. Rates vary by age, under 6 years and over 6 years (see Table 2).
(4) Not all children with working parents are assumed to need licensed care: the assumptions - % - under each age category are used. The remaining children are assumed to be cared for by family members, nannies, friends, and unlicensed care. Percentages are based on a detailed review of 12 other child care studies, including impact fee studies. Infant and preschool demand factors have been developed with the staff of the Dept. of Human Services and DCYF. School age Demand factor is from San Francisco Rec and Park Staff Survey in 2005.
(5) Includes demand from employees that work in these three areas but live elsewhere. This analysis assumes one child per employee that needs care at the rate of: 25% infants 75% preschool 0% school age
School age children are assumed to have care near their home and school.

Sources: California Department of Finance-P-3 Report; SF City Planning Department; and Brion & Associates.

Appendix C: Land Use Data and Growth Forecasts

APPENDIX C-1
LAND USE BREAKDOWN BASED ON SF PLANNING DEPARTMENT DEMOGRAPHIC DATA
Citywide Forecast

I. Existing Data (1)

Land Use Type	2006 Number of Residents/Employees	2006 Residents Per Unit/ Sqft per Employee	2006 Number of Units/Non-Res SF	
Single Family	291,000	3.11	93,520	*
Sr/SRO	22,400	1.00	22,292	*
Multi-Family (0-1 BR)	274,721	2.03	135,152	*
Multi-Family (2 or > BR)	189,000	2.10	90,089	*
Subtotal	777,121	*2.28*	341,052	*
Commercial (CIE)	94,127	205	19,295,974	*
Commercial (Motel/Hotel)	18,761	388	7,279,093	*
Commercial (Medical)	36,772	294	10,810,895	*
Commercial (Office)	225,676	400	90,270,440	*
Commercial (Retail)	97,205	324	31,494,307	*
Industrial	63,684	474	30,186,311	*
Subtotal	*536,224*	*353*	*189,337,019*	*

II. Future Data (2)

Land Use Type	2006-2025 Number of Residents/Employees	2006-2025 Residents Per Unit/ Sqft per Employee	2006-2025 Number of Units/Non-Res SF	
Single Family	1,733	3.53	490	*
Sr/SRO	860	1.17	735	*
Multi-Family (0-1 BR)	30,464	2.18	13,968	*
Multi-Family (2 or > BR)	22,814	2.45	9,312	*
Subtotal	*55,871*	2.28	*24,505*	*
Commercial (CIE)	4,442	225	999,400	*
Commercial (Motel/Hotel)	2,347	400	938,640	*
Commercial (Medical)	3,855	225	867,404	*
Commercial (Office)	51,122	225	11,502,528	*
Commercial (Retail)	8,297	300	2,489,072	*
Industrial	13,744	350	4,810,529	*
Subtotal	*83,807*	*258*	*21,607,571*	*

III. Total at 2025

Land Use Type	2025 Number of Residents/Employees	2025 Residents Per Unit/ Sqft per Employee	2025 Number of Units/Non-Res SF	
Single Family	292,733	3.11	94,010	
Sr/SRO	23,260	1.01	23,026	
Multi-Family (0-1 BR)	305,185	2.05	149,119	
Multi-Family (2 or > BR)	211,814	2.13	99,402	
Subtotal	*832,992*	2.28	*365,557*	
Commercial (CIE)	98,568	206	20,295,373	*
Commercial (Motel/Hotel)	21,107	389	8,217,733	*
Commercial (Medical)	40,627	287	11,678,298	*
Commercial (Office)	276,798	368	101,772,968	*
Commercial (Retail)	105,502	322	33,983,378	*
Industrial	77,429	452	34,996,840	*
Subtotal	*620,031*	*340*	*210,944,590*	*

* *Note may not add up due to rounding.*

(1) Existing base data are from the San Francisco Planning Department (October, 2006) and are based on the Land Use Allocation Study (2002). Data have been adjusted to 2006 numbers assuming average annual growth from 2000 to 2025.

(2) Employment Projections are from Moody's Economy.com for 2006 to 2025 by industry sector. Residential (population and household) projections are adjusted to be in line with the employment projections by Economy.com; adjustments were prepared by Brion & Associates and reviewed by DTA and City Staff. Residential data based on City of San Francisco Demographic Data provided by the Planning Department. Non-Residential data provided by Dun & Bradstreet. Also, please note that the total Multi-Family Residential Land Use Class figures were split assuming 60% of existing and future MF are/will be 0-1 BR and 40% are/will be 2 or more bedrooms.

Prepared by David Taussig Associates, Inc.; Brion & Associates.

APPENDIX C-2
LAND USE BREAKDOWN BASED ON SF PLANNING DEPARTMENT DEMOGRAPHIC DATA
Moody's Mission Bay Area Only

I. Existing Data (1)

Land Use Type	**2006** Number of Residents/Employees	**2006** Residents Per Unit/ Sqft per Employee	**2006** Number of Units/Non-Res SF	
Single Family				
Sr/SRO				
Multi-Family (0-1 BR)	1,267	1.76	720	*
Multi-Family (2 or > BR)	845	1.76	480	*
Subtotal	*2,112*	*1.76*	*1,200*	*
Commercial (CIE)	1,425	225	320,733	*
Commercial (Motel/Hotel)	0	400	0	*
Commercial (Medical)	34	225	7,749	*
Commercial (Office)	4,573	225	1,028,928	*
Commercial (Retail)	1,081	300	324,300	*
Industrial	1,787	350	625,554	*
Subtotal	*8,901*	*259*	*2,307,265*	*

II. Future Data (2)

Land Use Type	**2006-2025** Number of Residents/Employees	**2006-2025** Residents Per Unit/ Sqft per Employee	**2006-2025** Number of Units/Non-Res SF	
Single Family				
Sr/SRO				
Multi-Family (0-1 BR)	2,227	1.87	1,190	*
Multi-Family (2 or > BR)	1,485	1.87	793	*
Subtotal	*3,711*	*1.87*	*1,983*	*
Commercial (CIE)	4,220	225	949,392	*
Commercial (Motel/Hotel)	0	400	0	*
Commercial (Medical)	5	225	1,026	*
Commercial (Office)	9,598	225	2,159,598	*
Commercial (Retail)	1,026	300	307,800	*
Industrial	270	350	94,539	*
Subtotal	15,118	232	3,512,355	*

III. Total at 2025

Land Use Type	**2025** Number of Residents/Employees	**2025** Residents Per Unit/ Sqft per Employee	**2025** Number of Units/Non-Res SF	
Single Family				
Sr/SRO				
Multi-Family (0-1 BR)	3,494	1.83	1,910	*
Multi-Family (2 or > BR)	2,329	1.83	1,273	*
Subtotal	*5,823*	*1.83*	*3,183*	*
Commercial (CIE)	5,645	225	1,270,125	*
Commercial (Motel/Hotel)	0	400	0	*
Commercial (Medical)	39	225	8,775	*
Commercial (Office)	14,171	225	3,188,527	*
Commercial (Retail)	2,107	300	632,100	*
Industrial	2,057	350	720,093	*
Subtotal	*24,020*	*242*	*5,819,620*	*

* *Note may not add up due to rounding.*

(1) Existing base data are from the San Francisco Planning Department (October, 2006) and are based on the Land Use Allocation Study (2002). Data have been adjusted to 2006 numbers assuming average annual growth from 2000 to 2025.

(2) Employment Projections are from Moody's Economy.com for 2006 to 2025 by industry sector. Residential (population and household) projections are adjusted to be in line with the employment projections by Economy.com; adjustments were prepared by Brion & Associates and reviewed by DTA and City Staff. Residential data based on City of San Francisco Demographic Data provided by the Planning Department. Non-Residential data provided by Dun & Bradstreet. Also, please note that the total Multi-Family Residential Land Use Class figures were split assuming 60% of existing and future MF are/will be 0-1 BR and 40% are/will be 2 or more bedrooms.

Prepared by David Taussig Associates, Inc.; Brion & Associates.

APPENDIX C-3
LAND USE BREAKDOWN BASED ON SF PLANNING DEPARTMENT DEMOGRAPHIC DATA
Moody's Rincon Hill Area Only

I. Existing Data (1)

Land Use Type	**2006** Number of Residents/Employees	**2006** Residents Per Unit/ Sqft per Employee	**2006** Number of Units/Non-Res SF	
Single Family				
Sr/SRO				
Multi-Family (0-1 BR)	1,701	1.89	900	*
Multi-Family (2 or > BR)	1,134	1.89	600	*
Subtotal	*2,835*	*1.89*	*1,500*	*
Commercial (CIE)	309	225	69,498	*
Commercial (Motel/Hotel)	0	400	0	*
Commercial (Medical)	15	225	3,483	*
Commercial (Office)	13,469	225	3,030,521	*
Commercial (Retail)	3,923	300	1,176,756	*
Industrial	95	350	33,346	*
Subtotal	*17,811*	242	*4,313,604*	*

II. Future Data (2)

Land Use Type	**2006-2025** Number of Residents/Employees	**2006-2025** Residents Per Unit/ Sqft per Employee	**2006-2025** Number of Units/Non-Res SF	
Single Family				
Sr/SRO				
Multi-Family (0-1 BR)	2,886	1.55	1,860	*
Multi-Family (2 or > BR)	1,924	1.55	1,240	*
Subtotal	*4,810*	*1.55*	*3,100*	*
Commercial (CIE)	123	225	27,702	*
Commercial (Motel/Hotel)	0	400	0	*
Commercial (Medical)	2	225	342	*
Commercial (Office)	814	225	183,100	*
Commercial (Retail)	226	300	67,944	*
Industrial	7	350	2,522	*
Subtotal	*1,172*	240	281,610	*

III. Total at 2025 [5]

Land Use Type	**2025** Number of Residents/Employees	**2025** Residents Per Unit/ Sqft per Employee	**2025** Number of Units/Non-Res SF	
Single Family				
Sr/SRO				
Multi-Family (0-1 BR)	4,587	1.66	2,760	*
Multi-Family (2 or > BR)	3,058	1.66	1,840	*
Subtotal	*7,645*	*1.66*	*4,600*	*
Commercial (CIE)	432	225	97,200	*
Commercial (Motel/Hotel)	0	400	0	*
Commercial (Medical)	17	225	3,825	*
Commercial (Office)	14,283	225	3,213,621	*
Commercial (Retail)	4,149	300	1,244,700	*
Industrial	102	350	35,868	*
Subtotal	*18,983*	242	4,595,214	*

* Note may not add up due to rounding.

(1) Existing base data are from the San Francisco Planning Department (October, 2006) and are based on the Land Use Allocation Study (2002). Data have been adjusted to 2006 numbers assuming average annual growth from 2000 to 2025.

(2) Employment Projections are from Moody's Economy.com for 2006 to 2025 by industry sector. Residential (population and household) projections are adjusted to be in line with the employment projections by Economy.com; adjustments were prepared by Brion & Associates and reviewed by DTA and City Staff. Residential data based on City of San Francisco Demographic Data provided by the Planning Department. Non-Residential data provided by Dun & Bradstreet. Also, please note that the total Multi-Family Residential Land Use Class figures were split assuming 60% of existing and future MF are/will be 0-1 BR and 40% are/will be 2 or more bedrooms.

Prepared by David Taussig Associates, Inc.; Brion & Associates.

APPENDIX C-4
LAND USE BREAKDOWN BASED ON SF PLANNING DEPARTMENT DEMOGRAPHIC DATA
Moody's Visitation Valley Area Only

I. Existing Data (1)

Land Use Type	2006 Number of Residents/Employees	2006 Residents Per Unit/ Sqft per Employee	2006 Number of Units/Non-Res SF	
Single Family	5,751	4.01	1,434	*
Sr/SRO	230	1.50	153	*
Multi-Family (0-1 BR)	2,645	3.50	756	*
Multi-Family (2 or > BR)	2,875	3.80	757	*
Subtotal	*11,501*	*3.71*	*3,100*	*
Commercial (CIE)	373	225	83,952	*
Commercial (Motel/Hotel)	16	400	6,400	*
Commercial (Medical)	2	225	450	*
Commercial (Office)	58	225	13,107	*
Commercial (Retail)	183	300	54,768	*
Industrial	636	350	222,679	*
Subtotal	*1,268*	*301*	*381,355*	*

II. Future Data (2)

Land Use Type	2006-2025 Number of Residents/Employees	2006-2025 Residents Per Unit/ Sqft per Employee	2006-2025 Number of Units/Non-Res SF	
Single Family	62	4.80	13	*
Sr/SRO	25	1.80	14	*
Multi-Family (0-1 BR)	497	4.45	112	*
Multi-Family (2 or > BR)	658	4.80	*137*	*
Subtotal	1,242	*4.51*	276	*
Commercial (CIE)	10	225	2,223	*
Commercial (Motel/Hotel)	0	400	0	*
Commercial (Medical)	0	225	0	*
Commercial (Office)	48	225	10,867	*
Commercial (Retail)	33	300	10,032	*
Industrial	58	350	20,199	*
Subtotal	*149*	*290*	43,321	*

III. Total at 2025

Land Use Type	2025 Number of Residents/Employees	2025 Residents Per Unit/ Sqft per Employee	2025 Number of Units/Non-Res SF	
Single Family	5,813	4.02	1,447	*
Sr/SRO	255	1.52	167	*
Multi-Family (0-1 BR)	3,142	3.62	867	*
Multi-Family (2 or > BR)	3,534	3.95	894	*
Subtotal	*12,743*	3.78	3,376	*
Commercial (CIE)	383	225	86,175	*
Commercial (Motel/Hotel)	16	400	6,400	*
Commercial (Medical)	2	225	450	*
Commercial (Office)	107	225	23,974	*
Commercial (Retail)	216	300	64,800	*
Industrial	694	350	242,878	*
Subtotal	*1,417*	300	424,676	*

* *Note may not add up due to rounding.*

(1) Existing base data are from the San Francisco Planning Department (October, 2006) and are based on the Land Use Allocation Study (2002). Data have been adjusted to 2006 numbers assuming average annual growth from 2000 to 2025.

(2) Employment Projections are from Moody's Economy.com for 2006 to 2025 by industry sector. Residential (population and household) projections are adjusted to be in line with the employment projections by Economy.com; adjustments were prepared by Brion & Associates and reviewed by DTA and City Staff. Residential data based on City of San Francisco Demographic Data provided by the Planning Department. Non-Residential data provided by Dun & Bradstreet. Also, please note that the total Multi-Family Residential Land Use Class figures were split assuming 60% of existing and future MF are/will be 0-1 BR and 40% are/will be 2 or more bedrooms.

Prepared by David Taussig Associates, Inc.; Brion & Associates.

APPENDIX C-5
LAND USE BREAKDOWN BASED ON SF PLANNING DEPARTMENT DEMOGRAPHIC DATA
Moody's Total Forecast without Mission Bay, Rincon Hill and Visitation Valley Areas

I. Existing Data (1)

Land Use Type	2006 Number of Residents/Employees	2006 Residents Per Unit/ Sqft per Employee	2006 Number of Units/Non-Res SF	
Single Family	285,250	3.10	92,085	*
Sr/SRO	22,170	1.00	22,138	*
Multi-Family (0-1 BR)	269,108	2.03	132,776	*
Multi-Family (2 or > BR)	184,146	*2.09*	88,253	*
Subtotal	*760,673*	*2.27*	*335,252*	*
Commercial (CIE)	92,019	205	18,821,791	*
Commercial (Motel/Hotel)	18,745	388	7,272,693	*
Commercial (Medical)	36,720	294	10,799,213	*
Commercial (Office)	207,576	415	86,197,884	*
Commercial (Retail)	92,019	325	29,938,483	*
Industrial	61,165	479	29,304,732	*
Subtotal	*508,243*	*359*	*182,334,794*	*

II. Future Data (2)

Land Use Type	Number of Residents/Employees	Residents Per Unit/ Sqft per Employee	Number of Units/Non-Res SF	
Single Family	1,671	3.500	477	*
Sr/SRO	836	1.159	721	*
Multi-Family (0-1 BR)	24,854	2.300	10,806	*
Multi-Family (2 or > BR)	18,748	2.625	7,142	*
Subtotal	46,108	*2.408*	19,146	*
Commercial (CIE)	89	225	20,083	*
Commercial (Motel/Hotel)	2,347	400	938,640	*
Commercial (Medical)	3,849	225	866,036	*
Commercial (Office)	40,662	225	9,148,962	*
Commercial (Retail)	7,011	300	2,103,296	*
Industrial	13,409	350	4,693,270	*
Subtotal	*67,367*	*264*	*17,770,286*	*

III. Total at 2025

Land Use Type	Number of Residents/Employees	Residents Per Unit/ Sqft per Employee	Number of Units/Non-Res SF	
Single Family	286,921	3.10	92,563	*
Sr/SRO	23,005	1.01	22,859	*
Multi-Family (0-1 BR)	293,962	2.05	143,582	*
Multi-Family (2 or > BR)	202,894	2.13	95,395	*
Subtotal	806,781	*2.28*	*354,399*	*
Commercial (CIE)	92,108	205	18,841,873	*
Commercial (Motel/Hotel)	21,091	389	8,211,333	*
Commercial (Medical)	40,569	288	11,665,248	*
Commercial (Office)	248,238	384	95,346,846	*
Commercial (Retail)	99,030	324	32,041,778	*
Industrial	74,575	456	33,998,001	*
Subtotal	*575,611*	348	*200,105,080*	*

* *Note may not add up due to rounding.*

(1) Existing base data are from the San Francisco Planning Department (October, 2006) and are based on the Land Use Allocation Study (2002). Data have been adjusted to 2006 numbers assuming average annual growth from 2000 to 2025.

(2) Employment Projections are from Moody's Economy.com for 2006 to 2025 by industry sector. Residential (population and household) projections are adjusted to be in line with the employment projections by Economy.com; adjustments were prepared by Brion & Associates and reviewed by DTA and City Staff. Residential data based on City of San Francisco Demographic Data provided by the Planning Department. Non-Residential data provided by Dun & Bradstreet. Also, please note that the total Multi-Family Residential Land Use Class figures were split assuming 60% of existing and future MF are/will be 0-1 BR and 40% are/will be 2 or more bedrooms.

Prepared by David Taussig Associates, Inc.; Brion & Associates.

Appendix E:

Citywide Growth Forecast

CITY-WIDE DEVELOPMENT IMPACT FEE STUDY
GROWTH FORECAST

PREPARED FOR THE

CITY AND COUNTY OF SAN FRANCISCO

SAN FRANCISCO, CALIFORNIA

JANUARY 7, 2008

CONSULTING SERVICES PROVIDED BY:

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The purpose of this report is to describe and document employment and population forecasts developed for the City-wide Development Impact Fee Study. Brion & Associates, working with other team members, the City Controller's Office, and the Planning Department prepared this forecast specifically for the City-wide Fee Study. The growth forecasts represent a moderate growth scenario that considers both historical growth in the City and future growth as forecast by an independent economic firm, Moody's Economy.com.

This report describes the moderate growth scenario used in each of the fee nexus studies, explains its major assumptions and sources of data, and provides the rationale for its use. The growth forecasts for employment, households, and population are derived from an employment forecast by Moody's Economy.com.

Employment Growth

Moody's Economy.com forecasts the City's employment base will grow at an average annual rate of 0.77% per year from 2006 to 2025. **Exhibit 1** summarizes this forecast, broken down by industries that use office, retail, warehouse, high tech space, and other space. This forecast is also broken down by total jobs. Historic employment growth figures are also shown from 1980 to 2005 in five year increments.

Historical growth from Moody's compares to the data provided by the San Francisco Controller's Office, which is from the California Economic Development Department. On an annual basis, from 1995 to 2005, there is less than a one percent difference in the two employment counts for any given year.

As shown in **Exhibit 1**, the City has a total of about 533,220 jobs as of 2006, which compares nicely to the City Planning Department's estimate of about 536,224 jobs for 2006. For this analysis, we are using the City's land use database by Traffic Analysis Zone and Neighborhood to estimate 2006 data for this new forecast.[1] Approximately 57% of the Moody's forecast is comprised of office related jobs, 22% retail and 15% high tech. Very little growth is forecast in warehouse related jobs (less than one percent), and the remaining 6% is "other" jobs.

As shown in **Exhibit 2**, the forecast applies the 0.77% average annual growth rate to existing 2006 employment for an estimated total of 620,031 total jobs at 2025 or a net increase of 83,807 new jobs over the 19-year period.

For job growth in the three special planning areas, the analysis assumes that employment uses in Mission Bay, Rincon Hill and Visitation Valley will reach build-out by 2025. Visitation Valley and Rincon Hill do not have a significant amount of planned new employment growth over the existing base. In contrast, Mission Bay includes a large amount of new non-residential development potential and is posed nicely to capture a significant amount of future employment growth in the City.

[1] The City's estimate of 2006 development is based on the Planning Department's Land Use Allocation Study – 2002, and extrapolates 2006 figures based on the average annual growth expected from 2000 to 2025.

Population Growth

The analysis considers population growth in relation to employment growth, given that population growth requires some job growth and *vice versa*. For the population forecast we have reviewed the relationship between jobs and population from the new *ABAG 2007 Projections*, which forecast approximately 2.0 jobs per each new resident between 2006 and 2025. However, population growth in San Francisco is not solely driven by employment growth. Thus, the analysis uses a jobs-per-population factor of 1.5, which presumes that some portion of population growth will not be employment-dependent. To estimate expected population growth dependant on new jobs, we have divided by 1.5 for an estimated increase in population of about 55,871 residents. This forecast of population is 62% of ABAG's new 2007 projection for population growth through 2025.

Growth in Housing Stock

For housing units, the new population forecast is divided by persons per household factors from Department of City Planning, which vary by project area and the city as a whole. Based on this approach, the City would add about 24,505 new housing units or about 1,290 units per year on average. Historical dwelling unit growth averaged about 2,052 units per year from 2001 to 2005. Thus, our forecast would be about 63% of that recent average annual growth rate in units and reflects the recent slow down in the residential market.

For the three project areas that will be exempt from the new impact fees, the analysis does not assume all of the residential uses will be developed in Mission Bay and Visitation Valley. Based on discussions with Planning Staff we have developed the following assumptions:

- Mission Bay: 100% employment uses and about 65% of residential uses achieve build-out by 2025.
- Rincon Hill: 100% of both employment and residential uses achieve build-out by 2025.
- Visitation Valley: 100% of employment and 90% of residential uses achieve build-out by 2025.

Growth of Non-Residential Space

Exhibit 3 summarizes the employment forecast by land use category, area and year, and then converts it into square feet of space by land use category. Shown first are 2006 estimates of existing jobs by land use category with and without Mission Bay, Rincon Hill and Visitation Valley. Net new jobs through 2025 are also shown by land use category. These jobs are converted into estimates of building space based on average square feet per employee assumptions in the second half of the table.

The net new building square feet is used to calculate the non-residential impact fee. As shown, the City is expected to add about 1.1 million square feet of space per year on average over the forecast period for a total of 21.6 million square feet of total non-residential space. Of this amount, office space is expected to total about 11.5 million square feet. Proposition M which controls and regulates how much office space can be developed per year in the City limits office space per year to 875,000 square feet per year.[2] Our average annual expected office growth would equal about 605,000 square feet per year or less than the Proposition M

[2] Per Sarah Dennis, San Francisco Planning Department, correspondence dated March 9, 2007.

limit. The three project areas of Mission Bay, Rincon Hill and Visitation Valley would add about 3.8 million square feet of this growth in space and this space would be exempt from the impact fees.

Comparison of the Moderate Growth Scenario to Other Growth Forecasts

Exhibit 4 presents the comparison of all the forecasts reviewed to date for this effort. These include:

- ABAG 2005 Projections
- ABAG 2007 Projections
- Planning Department's Land Use Study Forecast, 2000 to 2035
- Historical Forecast, based on Controller's Office data on historical growth in the City
- Moody's Forecast

As shown, the Moody's forecast jobs per population factor is less than ABAG's forecast but higher than the Historical forecast, and much lower than the Planning Department's forecast. This table also estimates the average annual growth rates implied in each forecast by demographic category.

Exhibit 5 presents a summary of historical growth from the California Department of Finance and Moody's employment data for the City and compares it to the future forecast proposed for the fee studies. Jobs per resident or population are shown by five year intervals, and for 2006 and 2025. As shown, the job per resident factors implied in the forecast and planning data are similar to historical figures for the City. The data for 2005 and 2006 are lower than other years, due to the impacts of the dot.com crash, where the City lost a significant amount of jobs relative to population.

Development by Land Use by Year and Area

Exhibits 6-10 present the forecast for the entire City, each of the three special planning areas (Mission Bay, Rincon Hill and Visitation Valley) and the entire city net of the three planning areas. In each table residential and non-residential development, and population, housing units and employment is shown by year. The analysis is presented for 2006, 2006 to 2025, and total at 2025.

Exhibit 1
Historical and Projected Employment for San Francisco: 1980 to 2025 from Moody's Economy.com
San Francisco Citywide Development Impact Fee Study

Employment Category	Historical Employment						Projected Employment					Net Change			
	1980	1985	1990	1995	2000	2005	2006	2010	2015	2020	2025	1980-2005 Amount/Percent	1980-2005 Avg. Annual % Growth	2006-2025 Amount/Percent	2006-2025 Avg. Annual % Growth
	employment figures in 1,000s														
Office Employment	224.53	227.59	226.09	208.90	253.36	189.44	191.18	201.68	214.29	226.22	238.96	-35.08	-0.68%	47.78	1.18%
Net Growth		3.07	-1.51	-17.18	44.46	-63.92	1.73	10.50	12.61	11.93	12.74				
% Growth		1.4%	-0.7%	-7.6%	21.3%	-25.2%	0.9%	5.5%	6.3%	5.6%	5.6%	-15.6%		25.0%	
Retail Employment	94.13	95.97	99.70	95.71	118.36	106.22	107.88	111.68	115.40	121.00	126.61	12.09	0.48%	18.73	0.85%
Net Growth		1.84	3.73	-3.99	22.65	-12.14	1.66	3.80	3.72	5.60	5.61				
% Growth		2.0%	3.9%	-4.0%	23.7%	-10.3%	1.6%	3.5%	3.3%	4.8%	4.6%	12.8%		17.4%	
Warehouse Employment	40.44	35.53	31.24	23.13	22.90	19.99	20.42	20.82	20.90	20.82	20.45	-20.45	-2.78%	0.03	0.01%
Net Growth		-4.90	-4.30	-8.11	-0.23	-2.91	0.43	0.40	0.08	-0.08	-0.37				
% Growth		-12.1%	-12.1%	-26.0%	-1.0%	-12.7%	2.2%	2.0%	0.4%	-0.4%	-1.8%	-50.6%		0.2%	
High Tech Employment	21.69	22.33	19.32	20.21	41.48	22.34	22.39	25.07	28.59	31.68	34.53	0.65	0.12%	12.14	2.31%
Net Growth		0.64	-3.01	0.89	21.27	-19.14	0.05	2.68	3.52	3.09	2.86				
% Growth		3.0%	-13.5%	4.6%	105.3%	-46.1%	0.2%	12.0%	14.0%	10.8%	9.0%	3.0%		54.2%	
Other Employment	189.57	184.06	191.08	180.78	170.92	188.11	191.36	195.91	195.43	196.37	196.01	-1.46	-0.03%	4.65	0.13%
Net Growth		-5.51	7.02	-10.30	-9.86	17.19	3.25	4.55	-0.47	0.94	-0.36				
% Growth		-2.9%	3.8%	-5.4%	-5.5%	10.1%	1.7%	2.4%	-0.2%	0.5%	-0.2%	-0.8%		2.4%	
Total Employment (1)	570.36	565.49	567.41	528.72	607.02	526.10	533.22	555.16	574.62	596.09	616.56	-44.26	-0.32%	83.34	0.77%
Net Growth		-4.87	1.93	-38.69	78.30	-80.92	7.12	21.93	19.46	21.47	20.48				
% Growth		-0.9%	0.3%	-6.8%	14.8%	-13.3%	1.4%	4.1%	3.5%	3.7%	3.4%	-7.8%		15.6%	

(1) Includes total payroll employment, including non-BLS sectors.
From Moody's Economy.com for the City and County of San Francisco.

Sources: Moody's Economy.com; Brion & Associates.

Exhibit 2
Projected Growth in San Francisco from 2006-2025
San Francisco Citywide Development Impact Fee Study

Item		Existing Conditions 2006	Projected Growth 2006-2025 Amount (3)	Avg. Annual Growth Rate	Incremental Average Persons per Household	Total At 2025	Project Area Percent Buildout
Total Population	(1)	777,121	55,871	0.00%		832,992	na
Visitation Valley		11,501	1,242	-99.94%		12,743	90%
Mission Bay		2,112	3,711	5.48%		5,823	65%
Rincon Hill		2,835	4,810	5.36%		7,645	100%
Subtotal		16,448	9,763			26,211	
Total w/out MB/RH/V	(2)	760,673	**46,108**	-0.02%		806,781	na
Total Housing Units	(1)	341,052	24,505	0.52%	2.28	365,557	na
Visitation Valley		3,100	276	0.88%	4.80	3,376	91%
Mission Bay		1,200	1,983	5.27%	1.87	3,183	65%
Rincon Hill		1,500	3,100	-99.94%	1.55	4,600	100%
Subtotal		5,800	5,359			11,159	
Total w/out MB/RH/V	(2)	335,252	**19,146**	0.51%	2.09	354,399	na
Total Employment	(1)	536,224	83,807	0.00%		620,031	na
Visitation Valley		1,268	149	0.46%		1,417	100%
Mission Bay		8,901	15,118	0.74%		24,020	100%
Rincon Hill		17,811	1,172	0.38%		18,983	100%
Subtotal		27,981	16,440			44,420	
Total w/out MB/RH/V	(2)	508,243	**67,367**	-0.03%		575,611	na

(1) Employment Projections are from Moody's Economy.com for 2006 to 2025 by industry sector.
Residential (population and household) projections are adjusted to be in line with the employment projections by Economy.com; base data are from the San Francisco Planning Department (October, 2006) based on the Land Use Allocation Study - 2002.

(2) Mission Bay, Rincon Hill and Visitation Valley/Executive Park have separate agreements in terms of fees and have requirements to meet their child care impacts through project mitigation and are excluded from the fee analysis.

(3) The amount of growth shown in boxes would be subject to the Child Care Requirement and Linkage Fee, after additional adjustments in subsequent tables.

Sources: Moody's Economy.com; San Francisco Department of City Planning; David Taussig & Associates, Inc.; Brion & Associates.

Exhibit 3
Development Projections
for Non-Residential Uses
San Francisco Citywide
Development Impact Fee Study

Land Use	Existing Conditions 2006 (1)			Future Jobs - 2006 to 2025 (2)			Total Jobs at 2025		
	Estimated Jobs - 2006	2006 Jobs in Mission Bay/Rincon Hill/Visitation Valley (4)	Net Jobs 2006 (w/out MB, RH, VV)	Total Projected New Jobs -2006-2025	Mission Bay / Rincon Hill/Visitation Valley Growth (4)	Net New Jobs Subject to Fee - 2006-2025 (w/out MB, RH, VV)	Total Projected Jobs at 2025	Total Jobs in Mission Bay/Rincon Hill/Visitation Valley at 2025 (4)	Total Net Jobs at 2025 (w/out MB, RH, VV)
				a	*b*	*c*			
Non-Res. Development									
CIE	94,127	2,107	92,019	4,442	4,353	89	98,568	6,460	92,108
Hotel	18,761	16	18,745	2,347	0	2,347	21,107	16	21,091
Medical	36,772	52	36,720	3,855	6	3,849	40,627	58	40,569
Office	225,676	18,100	207,576	51,122	10,460	40,662	276,798	28,561	248,238
Retail	97,205	5,186	92,019	8,297	1,286	7,011	105,502	6,472	99,030
Industrial/PDR	63,684	2,519	61,165	13,744	335	13,409	77,429	2,854	74,575
TOTAL/AVG.	**536,224**	**27,981**	**508,243**	**83,807**	**16,440**	**67,367**	**620,031**	**44,421**	**575,610**
Avg. Per Yr - 2006 to 2025				**4,411**	**865**	**3,546**		**(5)**	**(5)**

(1) Land use categories and base data are from the San Francisco Department of City Planning (October 2006).
Data from 2006 is extrapolated from the 2000 to 2025 projections, based on average annual growth rates by land use category.

(2) New job growth is from Moody's Economy.com forecast for San Francisco, 2006 to 2025.

(3)
Based on typical new sqft per employee factors derived by reviewing proposed projects and actual projects in SF and other Silicon Valley cities by Brion & Associates.

The sqft per employee factors that exist currently are lower density factors than those used for the future analysis. It is assumed that in the future employees will use less sqft than they use currently.

(4) Visitation Valley, Rincon Hill and Mission Bay would not be subject to the new impact fee and the remaining square footage of development potential associated with these projects is removed for the analysis.

(5) The totals above are off by one job from the totals in Exhibit 1 due to rounding.

(6) This amount of expected office space development would be within the limits of that allowed by Proposition M, which restricts office development to 875,000 sqft per year. There is also an accumulation of 2.2 million sqft credit that can also be developed.

Sources: Moody's Economy.com; San Francisco Department of City Planning; David Taussig & Associates, Inc.; Brion & Associates.

Exhibit 3
Development Projections
for Non-Residential Uses
San Francisco Citywide
Development Impact Fee Study

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Land Use	Estimated Sqft in 2006	Future Average Sqft per Employee (3)	Projected New Sqft-2006-2025 (2)		Mission Bay / Rincon Hill/Visitation Valley Growth (3)	Net Development Potential Subject to Fee - 2006-2025	Total Sqft of Bldg. Space at 2025	Total at 2025 w/out MB,RH,VV
	d	*e*	*a * e = f*		*b * e = g*	*f - g =h*	*d + f = i*	
Non-Res. Development								
CIE	19,295,974	225	999,400		979,317	20,083	20,295,373	18,841,873
Hotel	7,279,093	400	938,640		-	938,640	8,217,733	8,211,333
Medical	10,810,895	225	867,404		1,368	866,036	11,678,298	11,665,248
Office	90,270,440	225	11,502,528	(6)	2,353,565	9,148,962	101,772,968	95,346,846
Retail	31,494,307	300	2,489,072		385,776	2,103,296	33,983,378	32,041,778
Industrial/PDR	30,186,311	350	4,810,529		117,259	4,693,270	34,996,840	33,998,001
TOTAL/AVG.	**189,337,019**		**21,607,571**		**3,837,285**	**17,770,286**	**210,944,590**	**200,105,080**
Avg. Per Yr - 2006 to 2025			**1,137,241**		**201,962**	**935,278**		

Exhibit 4
Comparison of Four Growth Projections
in San Francisco from 2006-2025
San Francisco Citywide Development Impact Fee Study

Item		Existing Conditions 2006	Projected Growth 2006-2025 Amount	% Change	Total At Buildout 2025	Average Annual Growth Rate
Population						
ABAG 2005	(1)	800,540	89,860	11.2%	890,400	0.56%
ABAG 2007	(2)	798,380	90,020	11.3%	888,400	0.56%
City Planning	(3)	777,221	57,327	7.4%	834,448	0.37%
Historical	(4)	777,221	57,327	7.4%	834,448	0.37%
Moody's	(5)	777,221	55,871	7.2%	832,992	0.37%
Households						
ABAG 2005	(1)	340,126	43,524	12.8%	383,650	0.64%
ABAG 2007	(2)	340,802	36,248	10.6%	377,050	0.53%
City Planning	(3)	341,052	25,159	7.4%	366,211	0.38%
Historical	(4)	341,052	25,159	7.4%	366,211	0.38%
Moody's	(5)	341,052	24,505	7.2%	365,557	0.37%
Employment (1)						
ABAG 2005	(1)	585,450	190,650	32.6%	776,100	1.49%
ABAG 2007	(2)	553,090	179,930	32.5%	733,020	1.49%
City Planning	(3)	536,225	224,712	41.9%	760,937	1.86%
Historical	(4)	525,466	20,310	3.9%	545,776	0.20%
Moody's	(5)	536,224	83,807	15.6%	620,031	0.77%
Jobs per Population						
ABAG 2005		0.73	2.12	290.1%	0.87	0.93%
ABAG 2007		0.69	2.00	288.5%	0.83	0.92%
City Planning		0.69	3.92	568.2%	0.91	1.48%
Historical		0.68	0.35	52.4%	0.65	-0.17%
Moody's		0.69	1.50	217.4%	0.74	0.40%

Note: There is not a different population and household forecast for the City Planning and Historical forecasts.

Note: City estimate of households is actually housing units and ABAG is households. The difference could be related to . vacancies

(1) Based on ABAG Projections 2005.

(2) Based on the recently released ABAG Projections 2007.

(3) City data and projections are from SF Planning Department as provided by David Taussig & Associates, Inc. (July 2006).
Note: There is not a different population and household forecast for the City Planning and Historical forecasts.

(4) Based on historical average annual growth rate for employment of .2% and applied to existing employment; population and housing is the same as for Planning forecast.

(5) Based on employment forecast for 2006 to 2025 by Moody's Economy.com.
Population and households estimates are based on historical housing growth, and comparison of population to employment by Brion & Associates.

Sources: ABAG; San Francisco Planning Department; David Taussig & Associates, Inc.; Brion & Associates.

Exhibit 5
Historical Population Growth for San Francisco: 1990 to 2005
San Francisco Citywide Development Impact Fee Study

	Historical Population & Employment (1)				Moderate Forecast (2)	
	1990	**1995**	**2000**	**2005**	**2006**	**2025**
Total Population	723,959	751,899	779,124	792,952	777,121	832,992
Net Growth		27,940	27,225	13,828	(15,831)	40,040
% Growth		3.9%	3.6%	1.8%	-2.0%	5.2%
Total Employment	567,415	528,721	607,023	526,101	536,224	620,031
Net Growth		(38,694)	78,303	(80,923)	10,123	93,930
% Growth		-7%	15%	-13%	1.9%	17.5%
Jobs per Resident	0.78	0.70	0.78	0.66	0.69	0.74
Net Growth		(0.08)	0.08	(0.12)	0.03	0.08
% Growth		-10%	11%	-15%	4.0%	11.7%

(1) Population is from the Department of Finance E-5 Report
Note that DOF's estimate of population is higher than the City's estimate for 2000 and 2005.
Planning data for population at 2000 is 756,967.
Employment is from Moody's Economy.com data for San Francisco.

(2) Employment forecast is from Moody's Economy.com; population forecast is based on adjustments to the Planning Department's forecast based on Moody's employment forecast, as prepared by Brion & Associates.

Sources: California Department of Finance E-5 Summary Report; Moody's Economy.com; Brion & Associates.

Exhibit 6
Projections Citywide by Land Use, Demographics and Year
San Francisco Citywide Development Impact Fee Study

I. Existing Data (1)

Land Use Type	2006 Number of Residents/Employees	2006 Residents Per Unit/ Sqft per Employee	2006 Number of Units/Non-Res SF	
Single Family	291,000	3.11	93,520	*
Sr/SRO	22,400	1.00	22,292	*
Multi-Family (0-1 BR)	274,721	2.03	135,152	*
Multi-Family (2 or > BR)	189,000	2.10	90,089	*
Subtotal	777,121	*2.28*	341,052	*
Commercial (CIE)	94,127	205	19,295,974	*
Commercial (Motel/Hotel)	18,761	388	7,279,093	*
Commercial (Medical)	36,772	294	10,810,895	*
Commercial (Office)	225,676	400	90,270,440	*
Commercial (Retail)	97,205	324	31,494,307	*
Industrial	63,684	474	30,186,311	*
Subtotal	*536,224*	*353*	*189,337,019*	*

II. Future Data (2)

Land Use Type	2006-2025 Number of Residents/Employees	2006-2025 Residents Per Unit/ Sqft per Employee	2006-2025 Number of Units/Non-Res SF	
Single Family	1,733	3.53	490	*
Sr/SRO	860	1.17	735	*
Multi-Family (0-1 BR)	30,464	2.18	13,968	*
Multi-Family (2 or > BR)	22,814	2.45	9,312	*
Subtotal	*55,871*	2.28	*24,505*	*
Commercial (CIE)	4,442	225	999,400	*
Commercial (Motel/Hotel)	2,347	400	938,640	*
Commercial (Medical)	3,855	225	867,404	*
Commercial (Office)	51,122	225	11,502,528	*
Commercial (Retail)	8,297	300	2,489,072	*
Industrial	13,744	350	4,810,529	*
Subtotal	*83,807*	*258*	*21,607,571*	*

III. Total at 2025

Land Use Type	2025 Number of Residents/Employees	2025 Residents Per Unit/ Sqft per Employee	2025 Number of Units/Non-Res SF	
Single Family	292,733	3.11	94,010	
Sr/SRO	23,260	1.01	23,026	
Multi-Family (0-1 BR)	305,185	2.05	149,119	
Multi-Family (2 or > BR)	211,814	2.13	99,402	
Subtotal	*832,992*	2.28	*365,557*	
Commercial (CIE)	98,568	206	20,295,373	*
Commercial (Motel/Hotel)	21,107	389	8,217,733	*
Commercial (Medical)	40,627	287	11,678,298	*
Commercial (Office)	276,798	368	101,772,968	*
Commercial (Retail)	105,502	322	33,983,378	*
Industrial	77,429	452	34,996,840	*
Subtotal	*620,031*	*340*	*210,944,590*	*

* *Note may not add up due to rounding.*

(1) Existing base data are from the San Francisco Planning Department (October, 2006) based on the Land Use Allocation Study - 2002 and has been adjusted to 2006 assuming average annual growth from 2000 to 2025.

(2) Employment Projections are from Moody's Economy.com for 2006 to 2025 by industry sector.
Residential (population and household) projections are adjusted to be in line with the employment projections by Economy.com; adjustments were prepared by Brion & Associates and reviewed by DTA and City Staff.
Residential data based on City of San Francisco Demographic Data provided by the Planning Department. Non-Residential data provided by Dun & Bradstreet. Also, please note that the total Multi-Family Residential Land Use Class figures were split assuming 60% of existing and future Multi-Family units are/will be 0-1 BR and 40% are/will be 2 or more bedrooms.
Prepared by David Taussig Associates, Inc.; Brion & Associates.

Exhibit 7
Projections Mission Bay by Land Use, Demographics and Year
San Francisco Citywide Development Impact Fee Study

I. Existing Data (1)

Land Use Type	2006 Number of Residents/Employees	2006 Residents Per Unit/ Sqft per Employee	2006 Number of Units/Non-Res SF	
Single Family				
Sr/SRO				
Multi-Family (0-1 BR)	1,267	1.76	720	*
Multi-Family (2 or > BR)	845	1.76	480	*
Subtotal	*2,112*	*1.76*	*1,200*	*
Commercial (CIE)	1,425	225	320,733	*
Commercial (Motel/Hotel)	0	400	0	*
Commercial (Medical)	34	225	7,749	*
Commercial (Office)	4,573	225	1,028,928	*
Commercial (Retail)	1,081	300	324,300	*
Industrial	1,787	350	625,554	*
Subtotal	*8,901*	*259*	*2,307,265*	*

II. Future Data (2)

Land Use Type	2006-2025 Number of Residents/Employees	2006-2025 Residents Per Unit/ Sqft per Employee	2006-2025 Number of Units/Non-Res SF	
Single Family				
Sr/SRO				
Multi-Family (0-1 BR)	2,227	1.87	1,190	*
Multi-Family (2 or > BR)	1,485	1.87	793	*
Subtotal	*3,711*	*1.87*	*1,983*	*
Commercial (CIE)	4,220	225	949,392	*
Commercial (Motel/Hotel)	0	400	0	*
Commercial (Medical)	5	225	1,026	*
Commercial (Office)	9,598	225	2,159,598	*
Commercial (Retail)	1,026	300	307,800	*
Industrial	270	350	94,539	*
Subtotal	15,118	232	3,512,355	*

III. Total at 2025

Land Use Type	2025 Number of Residents/Employees	2025 Residents Per Unit/ Sqft per Employee	2025 Number of Units/Non-Res SF	
Single Family				
Sr/SRO				
Multi-Family (0-1 BR)	3,494	1.83	1,910	*
Multi-Family (2 or > BR)	2,329	1.83	1,273	*
Subtotal	*5,823*	*1.83*	*3,183*	*
Commercial (CIE)	5,645	225	1,270,125	*
Commercial (Motel/Hotel)	0	400	0	*
Commercial (Medical)	39	225	8,775	*
Commercial (Office)	14,171	225	3,188,527	*
Commercial (Retail)	2,107	300	632,100	*
Industrial	2,057	350	720,093	*
Subtotal	*24,020*	*242*	*5,819,620*	*

* *Note may not add up due to rounding.*
(1) Existing base data are from the San Francisco Planning Department (October, 2006) based on the Land Use Allocation Study - 2002 and has been adjusted to 2006 assuming average annual growth from 2000 to 2025.
(2) Employment Projections are from Moody's Economy.com for 2006 to 2025 by industry sector.
Residential (population and household) projections are adjusted to be in line with the employment projections by Economy.com; adjustments were prepared by Brion & Associates and reviewed by DTA and City Staff.

Prepared by David Taussig Associates, Inc.; Brion & Associates.

Exhibit 8
Projections Rincon Hill by Land Use, Demographics and Year
San Francisco Citywide Development Impact Fee Study

I. Existing Data (1)

Land Use Type	2006 Number of Residents/Employees	2006 Residents Per Unit/ Sqft per Employee	2006 Number of Units/Non-Res SF	
Single Family				
Sr/SRO				
Multi-Family (0-1 BR)	1,701	1.89	900	*
Multi-Family (2 or > BR)	1,134	1.89	600	*
Subtotal	*2,835*	*1.89*	*1,500*	*
Commercial (CIE)	309	225	69,498	*
Commercial (Motel/Hotel)	0	400	0	*
Commercial (Medical)	15	225	3,483	*
Commercial (Office)	13,469	225	3,030,521	*
Commercial (Retail)	3,923	300	1,176,756	*
Industrial	95	350	33,346	*
Subtotal	*17,811*	242	*4,313,604*	*

II. Future Data (2)

Land Use Type	2006-2025 Number of Residents/Employees	2006-2025 Residents Per Unit/ Sqft per Employee	2006-2025 Number of Units/Non-Res SF	
Single Family				
Sr/SRO				
Multi-Family (0-1 BR)	2,886	1.55	1,860	*
Multi-Family (2 or > BR)	1,924	1.55	1,240	*
Subtotal	*4,810*	*1.55*	*3,100*	*
Commercial (CIE)	123	225	27,702	*
Commercial (Motel/Hotel)	0	400	0	*
Commercial (Medical)	2	225	342	*
Commercial (Office)	814	225	183,100	*
Commercial (Retail)	226	300	67,944	*
Industrial	7	350	2,522	*
Subtotal	*1,172*	240	281,610	*

III. Total at 2025 [5]

Land Use Type	2025 Number of Residents/Employees	2025 Residents Per Unit/ Sqft per Employee	2025 Number of Units/Non-Res SF	
Single Family				
Sr/SRO				
Multi-Family (0-1 BR)	4,587	1.66	2,760	*
Multi-Family (2 or > BR)	3,058	1.66	1,840	*
Subtotal	*7,645*	*1.66*	*4,600*	*
Commercial (CIE)	432	225	97,200	*
Commercial (Motel/Hotel)	0	400	0	*
Commercial (Medical)	17	225	3,825	*
Commercial (Office)	14,283	225	3,213,621	*
Commercial (Retail)	4,149	300	1,244,700	*
Industrial	102	350	35,868	*
Subtotal	*18,983*	242	4,595,214	*

* Note may not add up due to rounding.

(1) Existing base data are from the San Francisco Planning Department (October, 2006) based on the Land Use Allocation Study - 2002 and has been adjusted to 2006 assuming average annual growth from 2000 to 2025.

(2) Employment Projections are from Moody's Economy.com for 2006 to 2025 by industry sector.

Residential (population and household) projections are adjusted to be in line with the employment projections by Economy.com; adjustments were prepared by Brion & Associates and reviewed by DTA and City Staff.

Prepared by David Taussig Associates, Inc.; Brion & Associates.

Exhibit 9
Projections Visitation Valley by Land Use, Demographics and Year
San Francisco Citywide Development Impact Fee Study

I. Existing Data (1)

Land Use Type	2006 Number of Residents/Employees	2006 Residents Per Unit/ Sqft per Employee	2006 Number of Units/Non-Res SF	
Single Family	5,751	4.01	1,434	*
Sr/SRO	230	1.50	153	*
Multi-Family (0-1 BR)	2,645	3.50	756	*
Multi-Family (2 or > BR)	2,875	3.80	757	*
Subtotal	*11,501*	*3.71*	*3,100*	*
Commercial (CIE)	373	225	83,952	*
Commercial (Motel/Hotel)	16	400	6,400	*
Commercial (Medical)	2	225	450	*
Commercial (Office)	58	225	13,107	*
Commercial (Retail)	183	300	54,768	*
Industrial	636	350	222,679	*
Subtotal	*1,268*	*301*	*381,355*	*

II. Future Data (2)

Land Use Type	2006-2025 Number of Residents/Employees	2006-2025 Residents Per Unit/ Sqft per Employee	2006-2025 Number of Units/Non-Res SF	
Single Family	62	4.80	13	*
Sr/SRO	25	1.80	14	*
Multi-Family (0-1 BR)	497	4.45	112	*
Multi-Family (2 or > BR)	658	4.80	*137*	*
Subtotal	1,242	*4.51*	276	*
Commercial (CIE)	10	225	2,223	*
Commercial (Motel/Hotel)	0	400	0	*
Commercial (Medical)	0	225	0	*
Commercial (Office)	48	225	10,867	*
Commercial (Retail)	33	300	10,032	*
Industrial	58	350	20,199	*
Subtotal	*149*	*290*	43,321	*

III. Total at 2025

Land Use Type	2025 Number of Residents/Employees	2025 Residents Per Unit/ Sqft per Employee	2025 Number of Units/Non-Res SF	
Single Family	5,813	4.02	1,447	*
Sr/SRO	255	1.52	167	*
Multi-Family (0-1 BR)	3,142	3.62	867	*
Multi-Family (2 or > BR)	3,534	3.95	894	*
Subtotal	*12,743*	3.78	3,376	*
Commercial (CIE)	383	225	86,175	*
Commercial (Motel/Hotel)	16	400	6,400	*
Commercial (Medical)	2	225	450	*
Commercial (Office)	107	225	23,974	*
Commercial (Retail)	216	300	64,800	*
Industrial	694	350	242,878	*
Subtotal	*1,417*	300	424,676	*

* *Note may not add up due to rounding.*

(1) Existing base data are from the San Francisco Planning Department (October, 2006) based on the Land Use Allocation Study - 2002 and has been adjusted to 2006 assuming average annual growth from 2000 to 2025.

(2) Employment Projections are from Moody's Economy.com for 2006 to 2025 by industry sector.

Residential (population and household) projections are adjusted to be in line with the employment projections by Economy.com; adjustments were prepared by Brion & Associates and reviewed by DTA and City Staff.

Prepared by David Taussig Associates, Inc.; Brion & Associates.

Exhibit 10
Projections Citywide without Mission Bay, Rincon Hill, & Visitation Valley by Land Use, Demographics and Year
San Francisco Citywide Development Impact Fee Study

I. Existing Data (1)

Land Use Type	2006 Number of Residents/Employees	2006 Residents Per Unit/ Sqft per Employee	2006 Number of Units/Non-Res SF	
Single Family	285,250	3.10	92,085	*
Sr/SRO	22,170	1.00	22,138	*
Multi-Family (0-1 BR)	269,108	2.03	132,776	*
Multi-Family (2 or > BR)	184,146	*2.09*	88,253	*
Subtotal	*760,673*	*2.27*	*335,252*	*
Commercial (CIE)	92,019	205	18,821,791	*
Commercial (Motel/Hotel)	18,745	388	7,272,693	*
Commercial (Medical)	36,720	294	10,799,213	*
Commercial (Office)	207,576	415	86,197,884	*
Commercial (Retail)	92,019	325	29,938,483	*
Industrial	61,165	479	29,304,732	*
Subtotal	*508,243*	*359*	*182,334,794*	*

II. Future Data (2)

Land Use Type	Number of Residents/Employees	Residents Per Unit/ Sqft per Employee	Number of Units/Non-Res SF	
Single Family	1,671	3.500	477	*
Sr/SRO	836	1.159	721	*
Multi-Family (0-1 BR)	24,854	2.300	10,806	*
Multi-Family (2 or > BR)	18,748	2.625	7,142	*
Subtotal	46,108	*2.408*	19,146	*
Commercial (CIE)	89	225	20,083	*
Commercial (Motel/Hotel)	2,347	400	938,640	*
Commercial (Medical)	3,849	225	866,036	*
Commercial (Office)	40,662	225	9,148,962	*
Commercial (Retail)	7,011	300	2,103,296	*
Industrial	13,409	350	4,693,270	*
Subtotal	*67,367*	*264*	*17,770,286*	*

III. Total at 2025

Land Use Type	Number of Residents/Employees	Residents Per Unit/ Sqft per Employee	Number of Units/Non-Res SF	
Single Family	286,921	3.10	92,563	*
Sr/SRO	23,005	1.01	22,859	*
Multi-Family (0-1 BR)	293,962	2.05	143,582	*
Multi-Family (2 or > BR)	202,894	2.13	95,395	*
Subtotal	806,781	*2.28*	*354,399*	*
Commercial (CIE)	92,108	205	18,841,873	*
Commercial (Motel/Hotel)	21,091	389	8,211,333	*
Commercial (Medical)	40,569	288	11,665,248	*
Commercial (Office)	248,238	384	95,346,846	*
Commercial (Retail)	99,030	324	32,041,778	*
Industrial	74,575	456	33,998,001	*
Subtotal	*575,611*	348	*200,105,080*	*

* Note may not add up due to rounding.
(1) Existing base data are from the San Francisco Planning Department (October, 2006) based on the Land Use Allocation Study - 2002 and has been adjusted to 2006 assuming average annual growth from 2000 to 2025.
(2) Employment Projections are from Moody's Economy.com for 2006 to 2025 by industry sector.
Residential (population and household) projections are adjusted to be in line with the employment projections by Economy.com; adjustments were prepared by Brion & Associates and reviewed by DTA and City Staff.
Residential data based on City of San Francisco Demographic Data provided by the Planning Department. Non-Residential data provided by Dun & Bradstreet.
Also, please note that the total Multi-Family Residential Land Use Class figures were split assuming 60% of existing and future MF are/will be 0-1 BR and 40% are/will be 2 or more bedrooms.
Prepared by David Taussig Associates, Inc.; Brion & Associates.

10.5 City of Santa Monica Child Care Linkage Program Report (2005)

Report

Child Care Linkage Program

Prepared for:
City of Santa Monica

Prepared by:
Keyser Marston Associates, Inc.

November 2005

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EXECUTIVE SUMMARY

The City of Santa Monica directed Keyser Marston Associates, Inc. (KMA) to prepare an analysis of the impacts of new development on child care needs in the City of Santa Monica. The purpose of the analysis and report is to demonstrate and quantify the nexus between new development and child care demand as a basis for charging a child care impact fee on new development in Santa Monica, should the City wish to adopt a child care mitigation program. The City contracted for the report in June 2002 and the report was largely prepared in 2003 with portions updated in 2005; KMA believes that none of the earlier information has changed in a manner that would in any way undermine the conclusions of the analysis.

The objectives of the study were therefore as follows: (1) to assemble data and determine whether development of new commercial and residential space impacts demand for child care, (2) to quantify the demand related to newly constructed space, (3) to quantify the costs of mitigating the demand, or the costs to increase the supply of child care facilities in Santa Monica, and (4) to provide information to assist the City in selecting an appropriate fee level.

The analysis concludes that construction of commercial space or "Workplace Buildings" (office, retail and hotel, etc.) does increase the need for child care in the city and that new residential construction does not. The main body of this report, therefore, addresses development of commercial space and child care demand, mitigation costs, and fee setting issues. The analysis for residential development and child care demand is provided in an appendix section in addition to other supporting material.

Following are the key findings of the analysis.

Nexus Analysis for Workplace Buildings

- The linkages between the construction of workplace buildings in Santa Monica, the employees who work in them and the demand for care of children while the employees are at work, have been demonstrated and quantified in the analysis.

- A widely accepted interpretation of the California Governmental Code is that linkage fees may be used to address capital facilities only, not operational or programmatic costs. As a result, the linkage analysis quantifies the demand for spaces in child care center facilities and the cost of developing new child care center spaces.

- Child care centers at or near the workplace meet the child care needs of workers for infants, toddlers and preschool age children. Thus, the workplace analysis addresses these age groups only.

- An analytical approach is to examine a group or "universe" of 1,000 employees. The demand for child care from a universe of 1,000 employees finds that there are 140.21 children of infant, toddler and preschool age. The demand for child care spaces near the place of work is 35.68 spaces per 1,000 employees.

- A survey was conducted of the cost of West Los Angeles area recently developed and planned child care centers. A cost analysis for a prototypical child care center in Santa Monica was also prepared. The conclusion from the two approaches is that the cost of developing a child care center in Santa Monica is at least $35,000 per space on average in 2003. An update evaluation places the cost of each child care center space in Santa Monica at $18,500, excluding land and $55,400 including land.

When employees are converted to workplace building area using standard density averages, the demand for child care space associated with each square foot of workspace building area can be quantified. In addition, the cost of mitigation through development of child care facility space is also quantified using the updated 2005 costs as follows:

Child Care Center Cost per Sq. Ft. Building Area	Density	Excluding Land	Including Land
Office	250 sq. ft./Employee	$2.64	$7.91
Retail/Entertainment	350 sq. ft./Employee	$1.89	$5.65
Hotel/Lodging	500 sq. ft./Employee	$1.32	$3.95

Total child care linkage costs are provided with and without land in recognition that some child care centers may be developed on land either donated or already owned by the City. To reflect the mix, an average linkage cost for the two assumptions is recommended for establishing the maximum ceiling. Results are as follows:

Office ..... $5.27 per sq. ft.
Retail/Entertainment ..... $3.77 per sq. ft.
Hotel/Lodging ..... $2.64 per sq. ft.

These are the total child care nexus or linkage costs and represent the ceiling below which the City may set fee levels. Keyser Marston Associates does not recommend that these figures be used for actual fee levels but recommends that the City use these numbers for guidance in considering fee levels.

Additional Information to Assist in Designing a Fee Program

The following information is provided to assist policy makers.

- The total cost of development of commercial space in Santa Monica might be taken into account in considering fee levels. The cost (in 2003) to develop retail, office, and hotel space in Santa Monica was at least $300 to $400 per square foot, due to high land costs, high density building configurations and parking requirements. The fee amounts likely to be under consideration for child care will have very little impact on total development cost and decisions about whether to proceed with projects in Santa Monica.

- A survey of other jurisdictions with child care impact fees has identified 16 cities or counties with programs. Most of these jurisdictions are in Northern California, most were adopted 10 or more years ago, and a few fund operating expenses as well as new child care centers. The highest fee in California is $1.15 per square foot of commercial area recently adopted in the City of Palm Desert. Fees of $1.00 per square foot have been adopted in San Francisco, Berkeley, and the City of San Mateo. Seattle has a downtown bonus program that entails a higher amount, roughly $2 per square foot averaged over the total building area.

- Fee collection projections have been estimated for informational purposes. If Santa Monica commercial construction continues at the rate of 100,000 to 150,000 square feet of per year, a fee in the $2.50 to $3.50 range would generate approximately $250,000 to $450,000 per year. This revenue would be sufficient to build about 10 new child care center spaces per year, or a new 75 space child care center once every seven or eight years. (This estimate does not take into account any potential exemption for small projects.)

- Over the past 15 years, Santa Monica has included child care requirements in Development Agreements for six large scale projects. The Development Agreements were the result of project specific negotiations and do not reflect a child care mitigation program. The analysis and findings contained in this analysis could be used to apply more consistent mitigation requirements for large projects in the future.

Nexus Analysis for Residential Units

An analysis was conducted for residential units similar to the analysis for workplace building space. However, a child care linkage fee on residential construction is not recommended at this time due to the lack of growth in the number of preschool children (children under age 5) in Santa Monica, per the 1990 and 2000 U.S. Census.

An analysis of the child care facility costs associated with each residential unit plus programmatic costs based on current City expenditures was conducted for informational purposes. Should the City wish to pursue a linkage program in the future, or use the information for other purposes such as for the negotiation of development agreements, the findings may be useful to the City.

The child care facility linkage cost is quantified, using 2005 costs, in the same manner as with the workplace buildings. The cost of each child care center facility space, with and without land, is applied to the conclusion that there is demand for 0.003 child care spaces per residential unit,

Child Care Cost excluding land	$56 Per Residential Unit
Child Care Cost including land	$166 Per Residential Unit
Average	$111 Per Residential Unit

For informational purposes, the program costs per child were calculated. Following are the City funded program costs allocated to each residential unit in Santa Monica. These costs cover all children up through high school age.

Child Care and Youth Service Costs	**Cost per Residential Unit**
City Assistance to Pre-School, School-age Programs and Scholarships *	$581
Other City Expenditures for Child Care and Youth Services*	$2,640
Total Per Residential Unit	$3,221

*From 2002/03 Budget, City of Santa Monica

KMA Recommendations

- Based on all the factors summarized in this report, KMA suggests maximum fees in the range of the average for each building type: Office $5.27, Retail $3.77, Hotel $2.64
- KMA does not recommend establishing a fee for new residential construction at this time.
- For consistency, we recommend the same thresholds as with other standards or impact fees. The threshold for Development Review is 7,500 square feet. The Housing and Open Space Fee has lower fees below a 15,000 square foot threshold. The City may wish to reconsider all thresholds at this time.

INTRODUCTION

A. Background/Context

The following report analyzing the linkages between child care demand and new development in the City of Santa Monica has been prepared by Keyser Marston Associates, Inc. (KMA) pursuant to Santa Monica City Council direction, and the ensuing contract dated June 26, 2002. The report was prepared in 2003, with portions updated in 2005. This report covers a range of topics related to establishing and quantifying relationships between new construction in the City and the demand for child care, and the costs of mitigating that demand.

The City of Santa Monica has a history of supporting both the supply and quality of child care within the City. The City has played an active role in funding and assisting various projects, programs and activities for the children of City residents, and children who attend school in the City. In 1991, the City adopted a Child Care Master Plan, which identified the possibility of exploring the relationship between new development and increased demand for child care services, and thus the possibility of establishing a development fee that would mitigate the cost of the increased demand. This report summarizes the work program designed to meet the Council's objective.

B. Process

The City's Child Care and Early Education Task Force met with KMA personnel several times over the course of the work program. The Task Force provided direction and generally acted as a "sounding board" as findings and early recommendations emerged.

KMA staff also met extensively with City staff groups from Planning and Human Services Divisions throughout the work program. In addition, KMA and City staff met with representatives from the City Attorney's office to discuss legal directives related to impact fees and California State Law. This report presents the data, analysis, and professional recommendations resulting from all of these sources.

C. Report Organization

This document contains the linkage analysis for Workplace Buildings (office, retail, hotel) and a section providing materials to assist policy makers in deliberating fee levels and other linkage program terms. Sections I through IV, as described below, contain the analysis and report to meet the needs of AB 1600, as contained in Section 66000 of the California Code.

The report is divided into five sections as follows:

- *Section I* – outlines the concept and legal framework and summarizes the analysis parameters and the methodology for conducting the analysis. Major assumptions underlying the analysis are also provided in this section.

- *Section II* – presents the demand linkages for workplace buildings, starting with a given universe of employees, the incidence of children in various age groups, a discussion of how child care needs are met and, finally, the demand for child care center space near the parent's place of work.

- *Section III* – addresses the costs of mitigating child care demand through adding physical capacity in new child care centers. This section focuses on the capital cost of developing new child care centers in Santa Monica, based on both recent experience and an examination of the cost components.

- *Section IV* – links the findings regarding demand for child care to the findings regarding mitigation costs (Section II with Section III) relative to various types of buildings including office buildings, retail buildings, and hotels. The conclusion of Section IV provides total child care linkage costs per square foot of building area (for commercial buildings). This is the maximum amount that can be charged per square foot to mitigate new child care facility demands, per this analysis.

- *Section V* - is a brief recapitulation of the analysis and conclusions contained in Sections II through IV. It provides a summary of the major steps for linking employees to demand for child care center spaces near the work place to the cost of developing the new spaces.

- *Section VI* – presents some considerations and data to assist policy makers with decisions about setting fees and designing a linkage program for Santa Monica. Topics include fee amounts in the context of total development costs, other impact fees in Santa Monica, potential funding generation, and child care linkage programs in other jurisdictions. Unlike the prior sections, the material in this section does not address linkage per se.

An Appendix section provides the residential analysis and other supporting material, including a glossary of terms used in this report. An Executive Summary precedes the main report document.

D. Disclaimers

The analyses in this report have been prepared using the best and most recent data available. Secondary sources, such as the U.S. Census 2000 and surveys by the Urban Institute, were extensively used. Local information from the City of Santa Monica was also utilized whenever it was available. While KMA believes these sources of data are sufficiently accurate for the purposes of the analyses, KMA cannot guarantee their complete accuracy. As a result, KMA assumes no liability for conclusions drawn from these sources.

This report was originally prepared in 2003. Portions have been updated to reflect increases in land value and other adjustments. KMA believes that none of the earlier information has changed in a manner that would in any way undermine the conclusion of this analysis.

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SECTION I - ANALYSIS CONCEPT, PARAMETERS AND METHODOLOGY

A. Overview of the Concept and Methodology

This report summarizes the analysis and findings of the linkages between commercial construction and impacts on child care demand, as well as additional information of interest to policy makers in designing a linkage program for the City of Santa Monica.

The basic concept is a series of linkages that moves from construction of new buildings to new employees, new employees to families with children age 5 or under, to the number of children needing child care, to those with needs that can be met at or near the workplace. The conclusion of the impact analysis is the need or demand for child care spaces in relation to building area, or per square foot building area. The cost to mitigate the impact is the cost to build a child care facility prorated in proportion to the demand generated.

An approach used in this analysis is to analyze a group or "universe" of 1,000 employees that is applicable to the workers in all types of workplace buildings in the analysis. There is no suitable database that enables a differentiation as to how the employees in different types of buildings have different child care needs. The universe of 1,000 workers is selected because it enables the analysis to quantify children and child care in readily understandable whole numbers, rather than the very awkward fractions that an analysis on the per employee level would entail. At the end of the analysis, the findings are translated to costs per square foot of building area, to express a "linkage cost" or maximum fee level supported by the analysis.

Using U.S. Census information, a demographic analysis is conducted on the employees to determine what share have children of preschool age or under and what share of those have need for child care due to working parents (both parents work if a two-parent household or a single parent who is working). For the analysis of workers in Santa Monica, the demographic profile of Los Angeles County is used, since workers in Santa Monica come from all over the greater area and are more likely to have a demographic profile similar to the County as a whole than to the residents of Santa Monica.

B. Analysis Parameters

1. Building Types

The analysis is conducted for three major workplace building types — office, retail and hotel. These three types are short name versions of broad categories. The key variable in the definition is similarity of employment density. Office is inclusive of R&D (of the type likely to be drawn to Santa Monica), and also entertainment industry production space. Employment density

is assumed similar to the density factors utilized elsewhere in Santa Monica applications, such as for parking analysis.

The retail categories are more broadly inclusive of restaurants, bars and entertainment facilities, including cinemas and other commercial entertainment venues. Retail density is generally more varied than office density, and covers the spectrum from high volume small eating outlets to furniture stores where employment density is far less. The 350 square foot average per employee is an average of this broad spectrum.

Hotel categories cover the range of lodging types, including resorts. The major employment density variable with hotels is the service level. Given the high room rate structure of the Santa Monica hotel market, most newly developed facilities will have a high service level, probably higher than the one employee per room average used in the analysis. In applying a fee program to hotel space, the City has the option of treating all space within the hotel equally or of separating out retail, restaurant and office areas for different fee levels.

2. Infants, Toddlers and Preschool Children Only

The analysis must focus on the child care services relevant to the various building types addressed. For workplace buildings, including office buildings, retail projects and hotels or other lodging, the relevant child care is related to employees who need child care while at work. For purposes of this program, this means child care at or near the workplace (as opposed to near home). Essentially, this limits the universe to child care for infants, toddlers and preschool children; child care at (or near) the workplace is usually no longer a viable option once the child is in school, unless the school is close by. Most workers enroll their children in school in their home community or near their place of residence.

It is known that some workers in Santa Monica do enroll their children in Santa Monica schools despite living in another jurisdiction. From a conceptual standpoint, these children and the cost of mitigating their demands on the before and after school facilities and programs in Santa Monica schools could be included in the analysis. KMA and City staff agreed not to include them due to the following considerations:

- If the children of non-resident workers in Santa Monica were included in the analysis, it would be necessary to assemble data on children enrolled in Santa Monica schools, by age and grade level, who are there because their parents work in Santa Monica (as opposed to living outside the City and selecting Santa Monica schools for some other reason).

- Of the children enrolled in Santa Monica schools who meet the above criteria, it would be necessary to sort for (or identify the share of) children whose parents work in

commercial buildings as opposed to governmental or other types of structures not included in the analysis.

- Of the children who meet the above criteria, the analysis would then need to quantify all non-resident workers in commercial structures who enroll their children in Santa Monica schools as a share of all workers in these buildings. KMA believes this would be a very, very small share.

- Of those children quantified from the previous step, the analysis would apply the cost of increasing the capacity of facilities used to accommodate the before and after school programs.

- The result of the analysis would be a very small addition to the total linkage cost conclusion.

In addition to the technical requirements of including school age children in the analysis as summarized above, there may be policy issues as well. For example, if the school related linkage cost were included in the analysis, then the City would be obligated to expend a portion of linkage fee monies on school related facilities at some point. This could dilute limited resources for building new child care centers.

C. Capital Costs Only

The child care linkage program being explored for the City of Santa Monica is an impact fee program, with possible alternatives to paying a fee. As such, the program will need to meet the requirements of the Mitigation Fee Act, AB 1600 as written into California Government Code, Section 66000 and following. The generally accepted interpretation of the Code language is that impact fees in California can be levied to fund capital projects only. This means that only the costs of developing child care facilities may be used in determining impact fee amount. Also, collected funds may only be used for capital development.

Some jurisdictions have interpreted the law to allow other types of costs, such as programmatic costs, to be part of a linkage program. Examples include operating subsidies for child care centers, programs to assist lower income households in affording child care (such as Santa Monica's "scholarship" programs), programs to improve the compensation and benefits of child care workers, and so forth. It would be desirable to include these costs in a child care linkage program, but a broader interpretation of the law would be required. Appendix D presents an analysis of residential linkage that includes programmatic expenditures.

In summary, this analysis focuses on demand for new child care facility space and the costs of providing new space.

D. Implications on Use of Fee Monies

The calculation of impact mitigations and design of fee programs must be consistent with the expenditure of collected fee revenues. If the City designs the impact fee based on demand for child care facilities, the City can only spend impact fee revenues on increasing the supply of child care facilities.

Furthermore, impact fees generated by the development of new workplace buildings (fees on new construction) must be spent to mitigate child care demands associated with workplace buildings. This translates to increasing the supply of child care facilities for people who work in Santa Monica. Such facilities probably need not be restricted exclusively to workers, any more than existing child care centers are restricted to residents.

E. Other Nexus Concept Issues

The nexus analysis yields a causal connection between the construction of new buildings and the need for additional child care, a connection that is quantified in terms of the number of child care spaces and the associated child care facility costs.

The analysis and the nexus established by the analysis do not address existing child care shortages; the analysis addresses only new demands for child care associated with the construction of new workplace building area and new residences.

The analysis should not be construed to suggest that development is the only cause of child care supply problems; nor should it be construed to suggest that the development community should bear the full cost of addressing child care facility supply. An ordinance that implements the linkage program by levying a fee would be one component of a comprehensive program to address child care needs in Santa Monica.

There are several fundamental concepts and assumptions that are important underpinnings to the nexus concept and methodology. Following is a brief summary of these concepts and key assumptions.

- The relationship between construction and job growth in Santa Monica and the Los Angeles region is fundamental to the workplace buildings nexus. While employment growth does not occur due to any single cause or generator, construction of new workspaces does play a critical role in enabling growth to occur. Construction encourages growth, particularly in conjunction with the political and regulatory environment. Finally the provision of workplace buildings is a condition precedent to job growth and therefore bears a unique relationship to growth.

- The analysis assumes that new child care facilities are not being added to the supply in sufficient quantities to meet new needs. Surveys conducted by the City confirm that shortages are prevalent.

- The nexus analysis counts only "direct" employees, or employees that work within a building. Office, retail and hotel buildings are all serviced by a range of additional employees such as janitorial, security services, window washers, landscape maintenance personnel, etc. These employees are not counted in the analysis nor are indirect impacts on employment, such as might result from purchase of supplies, or food for a restaurant, etc. To be conservative, no multipliers or recognition of the multiplier effect of new developments is accounted for in the analysis. Construction employment is also not factored into the analysis.

F. Standard of Research and Data on Child Care

Child care as a concern of society and government has only come to the forefront in recent decades and many child care advocates would argue it is not yet enough at the forefront. The State has a licensing program, the federal government recognizes child care expenditures in the form of tax credits on personal income tax returns, and there are a number of federal, State and local assistance programs. On the non-governmental side there are a number of child care research and advocacy organizations working to advance child care. In addition, there are the child care provider associations, both for profit and non-profit. These entities all make valuable contributions to the data and "literature" on the state of child care in the U.S. today. However, in contrast to housing or employment where the federal government has played an active role for well over half a century, the state of child care data in the form of widely accepted governmental surveys is limited and lags far behind. As a result, U.S. Census data had to be supplemented by research findings from non-profit research institutes and other organizations. KMA believes the data used in this analysis is sufficiently reliable for the purposes for which it is used.

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SECTION II - THE DEMAND FOR CHILD CARE ASSOCIATED WITH WORKPLACES

Placing child care centers in workplace locations such as downtowns, in business parks and other employment centers is still a pioneering concept in the United States. The vast majority of child care centers are located in residential areas or near residential neighborhoods. However, experience and in depth surveys have borne out that parents generally prefer work located child care solutions for infants, toddlers, and preschool children when they are available, affordable and of comparable quality to other child care center alternatives. In fact, there are significant benefits to all parties, including:

- *Child and the Family* – More time with the child during the commute and at break time; less time required than taking a child to a center elsewhere.
- *Employer* – Better morale; enhances recruitment among employees; decreases absenteeism, tardiness, and turnover.
- *Developer* – A marketing advantage to enhance project attraction vis-à-vis the competition; improves leasing.
- *Community* – Improves the image of the community as a good place for families and business together.
- *Traffic Reduction and Air Quality Improvement* – Studies have found that, on average, families drive fewer miles if they can take their children to child care at work than if they use child care centers elsewhere.

Because of these benefits, many of the child care facilities located near workplaces have been built voluntarily by the private sector. Some firms with large numbers of employees provide child care centers to accommodate worker needs and enhance workforce attraction. Developers of large projects for multiple tenants sometimes add child care centers to attract tenants and add value to their projects.

A. Demand Analysis – Starting with 1,000 Employees

The methodology used in this analysis quantifies the demand for child care associated with a universe of workers. For ease of analysis and understanding, a universe of 1,000 workers was used. A universe of this size avoids having to describe children and child care needs in terms of tiny fractions carried out to four to five decimal places.

The major source of data is the U.S. Census 2000. Since workers in Santa Monica are drawn from all over the Los Angeles area, Los Angeles County population characteristics are deemed more appropriate than the characteristics of Santa Monica residents. Because the U.S. Census

provides only limited information on how families meet their child care needs, other national surveys are utilized as documented throughout.

B. Number of Worker Households Represented

The first step translates the number of employees or workers to worker households. This step recognizes that most households have more than one worker. Double counting of two-parent households is therefore avoided.

The factor of 1.44 workers per worker household was determined from the Census by taking the number of workers living in Los Angeles County and dividing them by the number of worker households in Los Angeles County. Worker households factor out or eliminate households comprised of retired or elderly people, households comprised of students, households of people on public assistance, and other types of households that do not contain workers.

Conclusion: The universe of 1,000 employees is reduced to 694.11 employee households. (1,000 divided by 1.44 = 694.11)

C. Employee Households with Children Needing Child Care

The next three steps calculate the number of children needing child care. The calculations are shown in Table 1 and described below.

Table 1
Demand for Child Care

Per 1,000 Employees or Per 694.11 Employee Households		Ages 0-2	Ages 3-5[1]	Total
Step 1. Employee Households with Children in Age Categories				
	Factor	13.56%	12.83%	
	Number	94.11	89.07	183.18
Step 2. Employee Households Needing Child Care (Parent(s) work)				
	Factor	56.47%	68.45%	
	Number	53.14	60.97	114.11
Step 3. Children Needing Child Care (Adjusts for more than one child in age group)				
	Factor	1.27	1.19	
	Number	67.51	72.70	140.21

[1]Five year old children from the Census data are distributed at 50% to the 3-5 year age group.
Source: U.S. Census, Los Angeles County 2000

Step 1: The first step is based on the incidence of worker households having children in each of the preschool age groups. Half of the five year olds are included in the age 3-5 preschool group

and half are assumed to be enrolled in kindergarten and no longer a candidate for child care near the parent's workplace. The age 0 to 2 group actually covers three years: under age 1, age 1, and age 2, or the infant and toddler groups. The age 3 to 5 group covers only two and a half years since only half of the five year olds are counted. This assumption is from the Urban Institute, Assessing the New Federalism series, discussed below.

Step 2: The second step factors out the share of the households with children that have all parents working. These are both two-parent households with both parents working and single parent households with one parent working. As to be expected, the percent increases as children get older. These are households with children needing child care.

Step 3: The last step adjusts for the fact that some of these households with children needing child care include more than one child per age group who needs child care.

Conclusion: From the universe of 1,000 workers, there is a demand for child care for 140.21 children.

D. How Child Care Needs Are Met

The next steps in the analysis address how child care needs are met. For this portion of the analysis, the U.S. Census does not provide adequate information. To obtain the best and most recent surveys on this question, KMA conducted a literature search and consulted organizations concerned with the analysis of child care needs.

1. National Studies

On a national level, the best data for this analysis purpose appears to be assembled by the Urban Institute, Assessing the New Federalism series. One publication in particular, entitled *Primary Child Care Arrangements of Employed Parents: Findings from the 1999 Survey of America's Families,* Occasional Paper Number 59, May 2002 was the best source for this purpose. The surveys in this series draw from a large national scope and have been updated periodically since the early 1990's. Some special reports in the series have focused on specific age groups; other surveys have tracked differences among states.

Table 2 presents key findings of interest from the above survey. Figures are provided for both the national average, and for California. In California, use of child care centers appears to be lower than the national average. The differences are believed to be a function of availability, affordability and to some extent cultural differences. The two columns on the right refer to above and below 200% Federal Poverty Level (FPL), which for a family of four is an extremely low income level by California standards.

Table 2
Primary Child Care Arrangements of Employed Parents

	U.S.	CA	CA – Below 200% FPL*	CA – Above 200% FPL*
Parent	27%	31%	45%	25%
Relative	27%	27%	25%	28%
Child Care Center	28%	22%	17%	24%
Family Child Care Home	14%	13%	10%	15%
Nanny/Other	4%	7%	3%	8%

*Federal Poverty Level is approximately $18,400 for a family of four, 200% is $36,800 per year.
Source: Urban Institute, *Primary Child Care Arrangements of Employed Parents: Findings from the 1999 Survey of America's Families,* Occasional Paper Number 59, May 2002.

The most notable finding is that more than half of all families use either a parent or a relative to meet their child care needs. Since the survey is of families with working parents, the solution for many families is for parents to either work different shifts or hours, or to take a child to work. Use of relatives to tend for children is a solution for another very large proportion of families as well. Nationally, the two arrangements combined represent 54%, and 58% in California.

The U.S. Census has done some surveys on child care, such as the *Who's Minding the Kids? Child Care Arrangements, Spring 1997 (p. 70-86),* but this study covers all child care arrangements used by parents and does not single out the primary arrangement. As a result it is not possible to identify the primary arrangements among working parents and to sort out a useful distribution of among child care options based on Census information.

2. California Studies

A few studies in California have addressed the question of how child care needs are met and have found similar results to the national studies. One report prepared by the UCLA Center for Healthier Children, Families and Communities, entitled *Public Opinion on Child Care and Early Childhood Education, California 2001,* prepared for the California Children and Families Commission, found that approximately 26% of children 0 to 5 years were in child care centers.

Selected findings from this report include:

- The primary child care arrangement varies by parent education, parent ethnicity, family income, and children's age.
- Children in families with higher incomes or whose parents have greater educational attainment are more likely than other children to be in center-based care/preschool. For

example, the primary arrangement is a private preschool or center for 33% of children in families with household income of $75,000 or above and for 13% of children when the household income is below $75,000.

- Younger children are more likely than older children to be cared for by their parents or to be in home-based arrangements. This is particularly true of infants. Older children, ages 3 to 5, are more likely to be in center-based care.

- Meeting child care needs sometimes varies by ethnicity. For example, a larger percentage of Hispanic children (24%) than non-Hispanic children (16%) are cared for by a relative.

The report covers a number of topics related to parental attitudes toward child care arrangements, importance of learning activities offered, affordability and government assistance availability and so forth. As an overview statement, the report findings contribute to the general recognition that center-based care offers a better learning environment than most alternatives but that affordability is a major obstacle.

E. Child Care Demand – 1,000 Employees

Drawing from the findings of the above surveys, national figures are utilized as a conservative estimate of demand among the child care arrangements for persons working in Santa Monica. The estimates are conservative in the sense that it is likely that the percent who would use child care centers were they available and affordable is understated. Were child care centers available and affordable, the literature strongly suggests that a large share of those who use parents and relatives would use child care centers and Family Child Care Homes. Needless to say, nanny and baby sitter arrangements are typically least affordable to most workers.

Table 3 indicates, by age level, the distribution of child care arrangements for the universe of 1,000 employees in Santa Monica. The first line in the table is drawn from Table 1, Demand for Child Care.

Table 3
Distribution of How Child Care Needs are Met

		Ages 0-2	Ages 3-5	Total
Children Needing Child Care (Table 1)		67.51	72.70	140.21
How Child Care Needs Will Be Met				
Parent/Relative		54.00%	35.00%	
Child Care Center		22.00%	45.00%	
Family Child Care Home		17.00%	14.00%	
Other		7.00%	6.00%	
		100.00%	100.00%	
Child Care Center				
	Factor	22.00%	45.00%	
	Number	14.85	32.72	47.57

Sources: US Census 2000; Urban Institute *Primary Child Care Arrangements of Employed Parents: Findings from the 1999 Survey of America's Families,* Occasional Paper Number 59, May 2002.

Conclusion: The demand for child care spaces in child care centers associated with a universe of 1,000 employees is 14.85 infant and toddler spaces and 32.72 preschool spaces, or a total of 47.57 spaces in child care centers.

F. Demand for Child Care Center Spaces near the Workplace

The last step in the analysis is an allocation of the child care center space demand to two generic locations – near place of work or near place of residence.

There is limited availability of good survey information to enable a split between demand for home based or work based child care. Current experience is a poor guide because there is so little work based child care available.

The UCLA study referenced earlier contained a helpful finding on this question.

- "Relatively few parents say they use employer based child care arrangements [because so few are available]. However, about 76% of parents report that they would be either very likely or somewhat likely to use a child care service offered at their place of work, and 62% say they would use it on a regular basis."

This finding is from a survey of parents using all types of child care arrangements, not of those using only child care centers. Thus, the percent of those using child care centers who would prefer them at place of work would presumably be far higher. However, there is another distinction in that "employer based" implies at the workplace location (as opposed to near the

workplace as is the analysis focus here) and may imply for some, an employer role in cost contribution.

Other surveys confirm a high level of preference for child care located near the workplace for the preschool child, for reasons indicated at the beginning of this section. Most of the surveys and research on this subject do not conclude with quantified distribution of demand. Based on the available information, KMA utilized a 75% share of the demand for child care centers to be located at or near the workplace.

	Age 0-2	Age 3-5	Total
Child Care Center Spaces Demanded (Table 3)	14.85	32.72	47.57
Share Near Place of Work @ 75% of Demand	11.14	24.54	35.68

Sources: US Census, Urban Institute, Keyser Marston Associates.

Conclusion: From the universe of 1,000 employees, 140.21 children need child care. Of all children needing child care, the demand for spaces in child care centers is 47.57. As shown in the lines above, 75% of the demand for child care center space is for a center located at or near the place of work or 35.68 spaces.

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SECTION III - CHILD CARE CENTER FACILITY COSTS

A. Introduction

In this section, KMA presents an analysis of the cost of child care center facilities. It is recalled that in Section I, we established that the prevalent interpretation of the California Code is that linkage fee programs may only address capital or facility costs. In Section I, KMA also clarified that the linkage for workplace buildings to child care must address demand for the preschool child only, or child care centers near the place of work for the children of employees. As such, the facility cost linkage for workplace buildings is for child care center facilities, or cost per child care center space.

1. Demand Conclusions Restated

In Section II, KMA quantified the demand for spaces in child care centers associated with a universe of 1,000 employees. KMA concluded that there was a demand for approximately 36 children in child care centers near the workplace. In this section, KMA quantifies the cost to develop each of these spaces, and, in that way, determines the cost to mitigate the child care impacts generated by new workplace development.

2. Analysis Approaches

Two different approaches are utilized to determine the costs of child care centers. The first approach is to examine the costs of developing child care centers by analyzing the component parts — building shell, equipment, land, etc. The second approach is to examine the cost experience of other recently developed West Los Angeles area child care centers. Further confirmation is made by looking at the costs of child care center development in other high cost areas.

The information in this section was assembled with the assistance of City of Santa Monica staff and the Child Care and Early Education Task Force. Survey and analysis results were presented to the Task Force and a number of adjustments were made per staff and Task Force input.

B. A Prototypical Child Care Center in Santa Monica

1. Development Space Requirements

To be licensed, child care facilities must meet minimum space requirements mandated by the State of California. These requirements, which differ by age of child, are briefly summarized below:

- Building Space

  - Infants and toddlers (ages 0-2) – 35 square feet plus an allowance of 15 square feet for bathroom and circulation space per child plus 15 square feet to allow for sleeping area, or 65 square feet per child.

  - Preschool and school age (ages 3 to 12) – 35 square feet per child plus an allowance of 15 square feet for bathrooms and circulation space.

- Outdoor play area – 75 square feet per child; 50 square feet for infants and toddlers.

Child care center operators agree that these are minimum space requirements and do not provide adequate space for a high quality child care center. The minimum requirement provides insufficient space for different simultaneous activities and for necessary administrative functions and other needs to be accommodated. As a result most child care centers are built to a slightly higher standard as the charts at the end of this section demonstrate. According to child care education experts, a good amount is 100 square feet per child. For the purpose of this analysis, the City of Santa Monica chose 70 square feet per child as an appropriate figure, and clarified that the figure does not reflect a city policy or standard for other applications.

2. Land Area Required

City of Santa Monica Zoning Code was used by City staff to determine the site size required for a child care center of an average workable size. Site coverage and parking requirements are particularly influential in determining total site needs.

Since Santa Monica land parcels are predominantly 7,500 square feet, or multiples of that size, total parcel size for a child care center was selected accordingly. A 15,000 square foot site would accommodate a 65-space child care center per City standards for parking and drop-off spaces and other site coverage requirements. A prototype of a 65-space child care center was selected for the analysis, which at 70 square feet per child is a 4,550 square foot center (65 children x 70 sq. ft. per child = 4,550 square feet).

The size of the land parcel and land cost estimate are for nexus analysis purposes. It is anticipated that centers may well be built on smaller parcels and have solutions for parking and drop-off spaces other than surface spaces. The prototypical child care center analyzed is a one-story building configuration with outdoor play areas and surface parking. To confirm these costs compared to costs for other more urban configurations, information on other prototypes was

assembled and compared. (See end of this section.) It is important to note that the total site cost is the key assumption, not the per square foot land area cost.[1]

At the time the analysis was prepared in 2003, a land cost of $80 per square foot was used, or the lower end of the range at that time. The 2003 figures in the inset Table 4 applied to a 15,000 square foot site area for a total of $1.2 Million. See footnote below.

3. Development Costs

The main components and unit costs are shown in Table 4.

Table 4
Child Care Facility Development Cost Summary (2003)

	PSF Bldg. Area	Bldg. Area	Total
Building Shell	$170/SF	4,550 SF	$773,500
Furnishings, Equipment and Indirects	$70/SF	4,550 SF	$318,500
Site (Land and Parking)	$264/SF	4,550 SF	$1,200,000
Total	$500/SF	4,550 SF (Bldg.)	$2,292,000

Source: Keyser Marston Associates' survey of West Los Angeles child care center construction costs, City of Santa Monica.

The furnishings, equipment and indirects category covers a range of costs including indoor furnishings and fixtures, outdoor play structures, start-up costs, design and engineering, fees and hook-ups, and financing.

The costs per child care space (for the 65-space center as calculated in 2003) are as follows:

Development costs excluding land	$16,800
Development costs including land	$35,260

[1] Since the initial preparation of this analysis in 2003, land costs have increased in Santa Monica. In 2005 the probable cost per square foot range is $125-$400, depending on location. At $160 per square foot, or double the $80 per square foot cost used in the initial analysis, the site cost would be $2.4 million or more than twice the rest of the project. More likely an alternative site solution would be found, using shared or structured parking and/or shared play area and other cost savings, keeping site costs less than $2.4 million. For reference, however, if the site cost were $2.4 million, the total project cost would become $3.5 million, instead of the $2.3 million indicated in Table 4 above.

If 2005 land cost at $160 per square foot is used and a 10% escalation in other costs, then total costs per child care space are as follows:

Development costs excluding land	$18,500
Development costs including land	$55,400

Conclusion: It costs approximately $18,500, excluding land, per child care space to develop a new child care center in Santa Monica. Total cost including land is $55,400 per child care center space. Table 5, at the end of this section, presents a more detailed summary of development costs.

C. Other West Los Angeles Area Child Care Center Costs

Table 6, at the end of this section, summarizes the development cost experience of other West Los Angeles child care centers. City staff identified the child care centers, varying in construction type and timing, to be included in the survey. Some of the surveyed centers are new construction developments, others are rehabilitation projects and one is currently in the planning process.

With the exception of the project in the planning stage, each center in the survey became operational between 1998 and 2002. Excluding land costs, the development costs per child care space range from $8,330 to $39,250. Cost differences are due to varying circumstances and year constructed. A summary of each case study follows:

1. New Construction

Les Enfants Inc. Preschool in Santa Monica has an enrollment of 72 children (28 infant, 18 toddler, and 26 preschool). The stand-alone building was constructed on a vacant lot in 1998 at $600,000, or $8,330 per child care space, excluding land. The school director did not provide the land purchase price due to confidentiality. The outdoor play area is approximately 5,000 sq. ft., or 70 sq. ft. per child. In addition to the outdoor play area, 5,000 square feet is dedicated to parking. The parking ratio is one space per seven children.

The Westside Children's Center (WCC) in Culver City has spaces for 100 children. It was developed in 2002 for $3,925,300, or $39,250 per child care space. The WCC is part of a larger facility and the first of two development phases. The indoor area is 11,650 square feet, or 115 square feet per child, excluding meeting space, additional building and storage space. The outdoor play area is approximately 15,000 sq. ft., or 150 sq. ft. per child. The parking ratio equals one space per four children.

In 1995, WCC purchased the 2.7-acre site for $1 million during an economic downturn. The land was owned by the City of Los Angeles and zoned industrial. Office and child care uses equally share the site.

2. Rehabilitation

New Path Montessori School is located in a 1929 single-family home, which was rehabilitated in 2001. The school has spaces for 30 toddlers (2-6 years old). The school includes 1,200 square feet of indoor space, or 40 square feet per child. Outdoor space is 1,400 square feet, 50 square feet per child. The parking ratio equals one space per ten children.

The acquisition and rehabilitation cost was $557,700, or $18,600 per child care space. Land costs account for $327,900 of the total costs. Rehabilitation costs were $229,800, or $190 per building square foot. The school director notes that rehabilitation costs exceeded original estimates due to implementation.

Saint Joseph Infant Toddler Development Center was purchased and rehabilitated by Venice Community Housing Corporation in 1999 for $498,700, or $21,700 per child care space, excluding land. The Center is located in a two-story building and has spaces for 23 children (6 infants (up to 18 months) and 17 toddlers (18 thru 36 months). The Center includes 1,570 square feet of indoor play area, or 70 square feet per child. The outdoor play area is approximately 900 square feet, or 40 square feet per child. The parking ratio is one space per 23 children.

Saint John's Health Center, Santa Monica Family YMCA and Smart Start centers were targeted to be part of the survey. However, due to the nature of these facilities, the data could not be organized in a way that was parallel to the other centers.

3. Planned Construction

The UCLA Campus Center is currently in the planning stages. However, preliminary estimates were provided for the survey. The Center will have spaces for 84 children (12 infants, 12 toddlers and 60 preschool). The construction costs are currently estimated to be $2.1 million or $25,000 per child.

The Center will have 5,000 square feet of indoor space and 7,500 square feet of outdoor space (60 square feet and 90 square feet per child, respectively). The development plan includes renovation of a 1,600 square foot existing child care facility to be used as a conference room and kitchen. There will be a few drop-off parking spaces but staff parking is to be located off-site elsewhere on campus.

A major private donation will pay construction costs. The university is providing the property.

See Appendix C for more information on each case study.

D. Other Child Care Center Averages (2003)

On a per square foot measure, total costs for the five examples show a broad range from $120 per square foot to over $460 per square foot. However, if the survey's lowest and highest costs are eliminated, the costs for the remaining three projects are in the range of $350 per square foot and the average construction cost per child care space, excluding land, is approximately $16,670.

Considering the differences in time and the expectation that most new child care centers will likely be new construction, the $16,800 analysis for current costs, excluding land, is supported by the experience in other West Side centers as a good average for new facilities.

The survey did not enable KMA to identify useful cost experience for land for new facilities in Santa Monica. Land costs were only provided for three of the case studies. The WCC land purchase had special circumstances that would not be applicable to a land purchase today. While New Path and Saint Joseph reported land costs, these centers are both rehabilitation projects where purchase costs included existing improvements. Therefore, as discussed in the previous section, a conservative estimate for residential land in Santa Monica in 2003 was $80 per square foot, or a total site cost of $1.2 million for a child care center for 65 children. (It is noted that child care centers built on sites costing more than $80 per square foot would likely resolve parking needs in some other manner, such as sharing parking with some other use, above grade or underground structures, etc.) With other solutions, the $1.2 million estimate for land for the 65-space center (or nearly $18,000 per child care space) was deemed a suitable land cost assumption for purposes of this analysis.

E. Child Care Center Cost Experience in Other High Cost Areas (2003)

As a cross check against the West Los Angeles Area experience, KMA assembled some information on the cost of child care centers in other high cost areas, both suburban in character and more center city urban. The two comparison areas are Silicon Valley in northern California and downtown Seattle, Washington.

1. Silicon Valley

Silicon Valley was selected as a comparable area due to very high land costs and generalized density of development akin to the western Los Angeles area. Several useful pieces of information were assembled that help confirm the Santa Monica cost range.

- The City of San Jose has a program to assist with the development of child care centers. A consultant hired by the city advised that the city should plan on child care centers

costing $16,000 per space, excluding land and parking. This appears to include an allowance for at least some equipment, furnishing and indirect costs.

- The City of Menlo Park has been seeking to redevelop a parcel in its civic center complex with a large child care facility to accommodate both preschool and after school programs. A design and project development team reported back to City Council to get authorization to seek construction bids. The estimated cost for the total 180-space project is $6,600,000. This figure computes to $34,178 per space or $439 per square foot building area. Since the city already owns the land, there is no land cost included, although there is significant site work needed.

- In late 2003, KMA conducted a survey of child care center development cost experience in the San Mateo-Peninsula area for the purposes of a child care linkage program in the City of Santa Mateo. Good data on four centers was assembled and it was concluded that total costs per space averaged at least $25,000 per space.

2. Downtown Seattle

In 2001, KMA conducted a child care linkage analysis for the City of Seattle and assembled information on the cost of child care centers in that downtown. At the time, there was one child care center that had been developed within a high-rise office building, the Washington Mutual Tower which was completed in 1988. The child care center was built for 23 infants and toddlers and no preschoolers due to the difficulty of the outdoor play area component. The development cost at that time was $525,000 or $22,800 per space. This cost did not include outdoor play area (some was added later). Nor did it include land cost. Only one dedicated parking space was built.

Other downtown child care centers not in high-rise buildings had similar development costs, particularly after adjustments for time of development and other differences.

For the Seattle program KMA undertook a prototypical child care center cost analysis similar to the Santa Monica analysis presented here. The major cost components and conclusion are shown in Table 7.

Table 7
Seattle Child Care Center Cost Analysis (2001)

	Per SF	Per Child Care Space	Total for 60 Child Care Spaces
Land (per square foot building area)	$30	$2,250	$135,000
Building Shell	$165	$12,375	$742,500
Furnishings, Equipment and Indirects	$148	$11,100	$666,000
Total	$343	$25,725	$1,543,500

Source: Keyser Marston Associates.

Several clarifications and comparisons are appropriate.

- The Seattle prototype included no parking or drop-off spaces.
- Land costs were prorated in a building and intentionally stated at the low end. Land cost per child care space was $2,250 in Seattle; the Santa Monica costs are much higher.
- Each of the 12 parking or drop-off spaces in Santa Monica costs an average of $28,266 in land costs. Were these 12 spaces in a parking structure instead, the cost of the structure including a land allocation and all indirect costs, would be roughly the same as the $28,000 per parking space.
- The Seattle prototype assumed 75 square feet per child care space compared to the 70 square feet per space assumption for Santa Monica.
- The estimate for furnishings, equipment and indirect costs was substantially higher in Seattle. This was a result of more detailed data on these costs in other child care centers in downtown Seattle.

F. Conclusion

After reviewing the rather wide range of cost experience in developing child care centers, particularly as it relates to all the costs beyond construction of the building shell, one can conclude that state-of-the-art cost estimating for child care centers is still in the formative stage. There appear to be few standards and little consistency with regard to what is counted, what is necessary, and how much should be allowed for such things as equipment and start-up costs. It is also evident that many child care facilities are built on land already owned and therefore land cost is frequently left out of the equation.

The recommendation from this analysis and survey is that $35,000 per space in Santa Monica is a good planning number for the purposes of a mitigation program. The cost per space excluding land at $16,800 clearly is at the low end, and there are at least three examples where costs are double that excluding land (West Los Angeles, UCLA, and Menlo Park). On the other hand the assumption of $18,460 per child care space for land (to meet the standards of the Santa Monica zoning code with respect to parking and drop-off spaces) is substantial and assumes no variance from the code to accommodate a child care center. Even if parking were accommodated in a structure or other more dense solutions to the child care building and outdoor areas were employed and some code variance was permitted, KMA believes that it would be difficult to reduce the "all inclusive" cost of a child care center in Santa Monica below $35,000 per space.

The update for late 2005 presents revised conclusions as discussed in Section B, as follows:

Development cost excluding land, per child care space	$18,500
Development cost including land, per child care space	$55,400

G. A Note on Rehabilitation of Child Care Centers

The survey of recently developed West Los Angeles area child care centers found a number of them were rehabilitations of existing buildings. These costs per space again ranged widely and were highly inconsistent with respect to what was counted and not counted. Rarely does the cost or value of the existing structure and land get included in the calculation. Since the City of Santa Monica does not own or identify buildings with rehabilitation potential for child care centers, it was not appropriate to use rehabilitation as an option to mitigate new demands.

A child care linkage ordinance, if adopted, will provide for alternatives to paying any fee to mitigate child care demand. The alternatives would include the construction of new child care facilities and the rehabilitation of existing structures, subject to certain standards and acceptability to the City. In other words, if a developer chooses to meet a child care linkage obligation through rehabilitating an existing structure and can do so at less cost, the developer could be welcome to do so.

TABLE 5
TYPICAL CHILD CARE CENTER FACILITY COSTS (2003)
CHILD CARE LINKAGE PROGRAM
CITY OF SANTA MONICA

Number of Children:	65		
Size of Facility			
Indoor Space @	70 sq. ft. per child	4,550 sq. ft.	
Outdoor Space @	80 sq. ft. per child	5,200 sq. ft.	
Total		9,750 sq. ft.	
Cost of Facility			
Building shell @	$170/sf	4,550 sq. ft.	$773,500
Furnishing, equipment @ (includes indirects)	$70/sf	4,550 sq. ft.	$318,500
Land required:			
Building pad		4,550 sq. ft.	
Parking [1]			
Facility Parking @ 9 spaces		3,190 sq. ft.	
Drop-off Parking @ 3 spaces		1,050 sq. ft.	
Outdoor play area		5,200 sq. ft.	
		13,990 sq. ft.	
Total land required @ 93% coverage		15,000 sq. ft.	
Land cost @ $80 sq. ft. x 15,000 sq.ft.			$1,200,000
Total development cost			$2,292,000
Cost per sq. ft. child care facility			$500
Cost per child care space			
Including Land			$35,260
Excluding Land			$16,800

[1] City provided parking space requirements. Assumes one parking space per 500 sq. ft. gross building area and assumes one parking space requires 350 sq. ft.

TABLE 6
WEST LOS ANGELES PRE-SCHOOL CHILD CARE CENTERS SURVEY
CHILD CARE LINKAGE PROGRAM
CITY OF SANTA MONICA

Name/Location	Developer	Year Built/ Rehab	No. of Child Care Spaces (FT equiv.)		Total Size (Sq. Ft.) Indoor	Total Size (Sq. Ft.) Outdoor	Total Cost	Cost/ Space	Cost/ Sq. Ft. Indoor	Cost Excluding Land Cost/ Space	Cost Excluding Land Cost/ Sq. Ft. Indoor	Comments
NEW CONSTRUCTION												
Les Enfants Inc. Preschool	Nancy Behravesh,Director	1998	*Infant*	28								
2702 Virginia Avenue	(310) 315-0058		*Toddler*	18								
Santa Monica	Page Construction		*Pre-School*	26								
			Total	72	Per Child	69	69					
					Total	5,000	5,000	$ 600,000	$ 8,330	$ 120	$ 8,330	$ 120 Land purchase price not provided due to confidentiality. Outdoor space excludes 5,000 sq ft dedicated to parking. Parking ratio is one space per seven children.
Westside Children's Center (WCC)	WCC	2002	*Infant*	0								
12120 Wagner Street	Rosa Arevalo/Douglas Chin		*Toddler*	** 48								
Culver City CA 90230	(310) 397-4200		*Pre-School*	52								
			Total	100	Per Child	117	150	$ 4,383,310	$ 43,830	$ 380	$ 39,250	$ 340 The child care center is part of a large facility and the first of two development phases. Reported size excludes meeting space, additional building & storage. Large site - WCC purchased 2.7 acre industrial site in 1995. Parking equal to approximately one space per 4 children. .
			** 18-34months		**Total**	11,650	15,000					
REHABILITATION												
New Path Montessori School	Chandra Jayasekara (Ira)	2001	*Infant*	0								
1962 20th Street	(310) 450-2477		*Toddler*	* 30								
Santa Monica			*Pre-School*	0								
			Total	30	Per Child	40	47	$ 557,700	$ 18,590	$ 460	$ 7,860	$ 190 Owner claims extraordinary renovation costs. Parking ratio is approximately one space per 10 children
			* 2-6 years		**Total**	1,200	1,400					
Saint Joseph Infant Toddler Development Center												
718 Rose Avenue	Saint Joseph Center	1999	*Infant*	* 6								
Venice, CA 90291	Judy Alexander		*Toddler*	** 17								
	(310) 396-6468 x306		*Pre-School*									
	Venice Cmnt Hsg		*Total*	23	Per Child	68	39	$ 498,700	$ 21,680	$ 320	$ 16,690	$ 240 Parking equal to approximately one space per 23 children.
	Lori Zimmerman		* 0-18 months		**Total**	1,570	900					
	(310) 399-4100		** 18-36 months									
PLANNED CONSTRUCTION												
UCLA												
UCLA campus	Gay Macdonald	2003	*Infant*	12								
	UCLA Child Care Services		*Toddler*	12								
	(310) 206-1861		*Pre-School*	60								Project is in planning stages, very preliminary estimates provided. Project includes 1,600 sq ft for renovation of existing child care center, includes kitchen
			Total	84	Per Child	60	89	$ 2,100,000	$ 25,000	$ 320	$ 25,000	$ 320 & staff space. University donated land. Off-site but on-campus parking provided.
					Total	5,000	7,500					
SURVEY AVERAGE				**56**	**Per Child**	**71**	**79**				**$ 19,386**	**$ 242**

Source: Keyser Marston Associates' interviews with child care center staff.

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SECTION IV – BUILDING DEVELOPMENT AND LINKAGE COSTS

This section combines the findings of the demand analysis (Section II) with the findings of the child care center development cost analysis (Section III) to establish linkage costs. This section first addresses the linkages between workplace building construction and job growth. The historic relationship between the construction of workplace buildings and job growth is examined both in general and for different types of workplace buildings to the extent data availability allows. The three types of workplace buildings that are the subject of this analysis are: office (or office/R&D/), retail and entertainment, and hotel and other lodging. This analysis allows us to link buildings to jobs to employees and child care demand impacts on a per square foot level.

In parts D and E of this section, the conclusions with respect to the child care demand impacts and the costs of mitigating the child care impact are joined together. The result is a quantification of child care impacts associated with workplace building construction per square foot and the costs of mitigation per square foot. The conclusions of the analysis represent the maximum charge for mitigation, or maximum impact fee level supported by this analysis. The City may design impact fees or other type linkage requirements at any level below those established by this analysis.

A. Construction and Job Growth Linkage

The first link in the chain of linkages joining the construction of workplace buildings and child care demand is that between building construction and job growth. If the impact fee is levied on a building at the time of construction, the underlying assumption is that the addition of building space will result in more jobs in Santa Monica. (See Section I for more on the underlying concept and ancillary assumptions.)

To confirm the relationship, KMA assembled available information on job growth and workplace building construction in Santa Monica. For the job growth/building analysis, City staff provided Santa Monica job data for 1995-2000, based on State Employment Development Department (EDD) reports. Job data of this detail are not available for Santa Monica prior to 1995. Data was supplemented with information from the economics page located in Section 6 of the City's web site. The web site refers users to the California State University Long Beach Office of Economic Research 3rd Annual Santa Monica Economic Forecast Presentation (November 2001).

The jobs data series provided by the City appears to be the only data available at the city level. The data series is based on payroll forms prepared by companies and submitted to the EDD. This data source has the following limitations:

- The self-employed and business owners operating as a sole owner, rather than a corporation, without payroll deductions are excluded. Contract workers are also excluded.

- The information is based on where the payments are reported from; e.g., if all Burger King employees are paid through Burger King headquarters, then their statistics would show up in the Burger King headquarters location. The reciprocal is also true; if a corporation is headquartered in Santa Monica payroll information would be provided for the entire company, regardless of whether jobs are located in Santa Monica.

- The data is organized by major Standard Industrial Classification (SIC). This classification system does not neatly match to building type for many categories. Office is particularly problematic since office jobs are a large portion of the services, the finance insurance and real estate "industry", and, in a place like Santa Monica, many manufacturing firms have office functions there, not production activities.

Table 8
Number of Jobs in Santa Monica by Major Industry

	1995	2000	Change
Agriculture	266	546	280
Mining	-	-	-
Construction	1,688	1,832	145
Manufacturing	2,241	3,083	843
Transportation/Utilities	1,352	1,735	383
Wholesale Trade	2,205	2,127	(78)
Retail Trade	13,994	17,328	3,334
FIRE	5,127	5,561	434
Services	28,276	34,859	6,583
Public Administration	4,956	5,974	1,018
Confidential[(1)]	2,305	1,039	(1,266)
Total	62,410	74,084	11,675

[(1)]To protect employee identity, specific job type is not available for these jobs.
Source: City of Santa Monica.

To convert jobs by industry to jobs by building type, KMA utilized a cross matrix of percentage relationships to estimate the share of jobs in office type buildings. For retail and hotel jobs discrete industries subsets could be used. The estimate of jobs by building type for the three types of buildings under analysis is shown in Table 9.

Table 9
Estimated Jobs by Building Type

Building Type[1]	1995	2000	Change
Office (Estimated)	17,162	19,928	2,766
Hotel	1,317	2,571	1,254
Retail	13,994	17,328	3,334
Total	32,474	39,827	7,354

[1]Building types reflect major non-residential uses represented in the Child Care Nexus analysis. Jobs for a specific building type are comprised of related SIC employment codes. Data is not available on a more detailed level.
Source: City of Santa Monica, Keyser Marston Associates.

The City also provided KMA with annual construction activity for the same time period. The information is from building permits and therefore should lead to job growth. For this analysis, it was assumed that on average jobs would occupy new buildings approximately a year after permitting.

During the 1995-1999 period, approximately 1.12 million square feet of commercial development activity was reported (see Table 10). The information does not break down building types further than "hotel" and "other-commercial." Further, no hotel development activity was reported for this time period, despite the growth in hotel jobs. The City of Santa Monica issued building permits in the late 1980s for three hotels constructed in the early 1990s. These new hotels are likely responsible for the growth in the number of hotel jobs in the mid to late 1990s, as hotels typically take a few years to achieve stable operations and would continue to expand employment during this period.

B. Jobs and Construction Activity Correlation

Because the data do not identify individual building types, the analysis illustrates the general correlation between jobs and building. Table 10 presents the relationships found from comparing the new jobs to the new space over the 1995 to 2000 time period.

Table 10
Correlation Between Jobs and Commercial Building

	New Jobs (1995-2000)	Building (SF) (1995-1999)	SF per Employee
Hotel	1,254	0	0
Other Commercial	10,421	1,116,118	107
Total/Average	11,675	1,116,188	96

Source: City of Santa Monica; Keyser Marston Associates.

The data shows that there is indeed a correlation between employment and workplace building activity in Santa Monica for the five-year period. In other words, as new workplace buildings were developed during this period, new jobs were also created.

The relationship between employee and square feet of building area can be expressed as a density factor. As shown above, Santa Monica gained 11,675 jobs and 1.12 million square feet of nonresidential building area was developed between 1995 and 1999. The average density factor during this period would calculate to one employee per 96 square feet.

The time series reflects a period of vigorous economic expansion only. As such, there probably was considerable job growth in existing buildings. Busy restaurants employ more staff than more idle ones. With a longer time series one would expect to see the very high density levels found here (or low number of square feet per employee) come down substantially. Unfortunately, KMA was unable to obtain the same series information for the 1990 to 1995 period.

However, figures on total job growth and construction activity in Santa Monica over the decade are available. The Cal State Long Beach Office of Economic Research reported the job figures, supplied by the City. These figures indicate total non-farm employment in Santa Monica as follows:

1991	51,000 (approx.)
1995	62,140
2000	75,500

These figures show that Santa Monica experienced substantial growth during the early half of the decade despite the recession in the region and the State as a whole over the period. According to this series job growth over the decade was 24,500 jobs.

Total commercial construction activity in Santa Monica over the period from 1990 through 2000, according to the City, was 1,636,812 square feet, or 148,802 per year on average. (See Table 12, at the end of this section, for annual figures.)

The density of new jobs in new buildings from the whole decade computes to 67 square feet per job (1,636,808 /24,500 = 67). Again this suggests much job growth was occurring in existing structures. Other adjustments that might be made with more complete data include elimination of government jobs and others not housed in the analysis categories, jobs that occurred in additions and remodels to existing structures, etc.

C. Employment Density

The available employment data series does not provide an adequate level of detail particularly as relates to individual building types. In addition, the unusually vigorous growth during the time period resulted in substantial employment growth, some of which was occurring in existing buildings. Therefore, given these limitations, KMA believes it is appropriate to use standard employment density factors for workplace buildings instead.

These relationships are based on surveys, some national, some local, for a wide range of conditions collected over many years. Appropriate factors were selected for Santa Monica conditions and were discussed with staff. If the City uses such factors in other applications (such as parking standards), the factors utilized are: 250 square feet per employee for office buildings, 350 square feet per retail worker and one hotel employee per hotel room, or per 500 square feet of hotel building area. The density factors are all notably less dense than the data on job growth and building construction during the late 1990s in Santa Monica would suggest.

D. 1,000 Employees and Building Area

Employment density factors allow one to move back and forth between numbers of employees and building area for various types of workspace buildings. Returning to the universe of 1,000 employees, the following building sizes result:

1,000 Employees Related to Building Size

Office	250 sq. ft./employee	250,000 sq. ft.
Retail/Entertainment	350 sq. ft./employee	350,000 sq. ft.
Hotel/Lodging	500 sq. ft./employee	500,000 sq. ft.

E. Child Care Demand and Mitigation Costs Related to Building Area

At this juncture, it is possible to link workplace building area with number of employees, with child care demand and the costs of mitigating child care demand. Table 12 summarizes the sequence of steps and the results of the analysis, using the updated 2005 figures with and without land.

Table 12
Workplace Buildings Mitigation Costs Per Square Foot (2005)

Child Care Center Spaces in Demand per 1,000 Employees (End of Section II)			35.68
		Excluding Land	Including Land
Cost of Child Care Facilities per Space (End of Section III)		$18,500	$55,400
Cost of Child Care Center Spaces for 1,000 Employees		$660,100	$1,976,700
Cost of Child Care Center Space per Employee		$660	$1977
Child Care Center Cost per Sq. Ft. Building Area			
Office	250 sq. ft./Employee	$2.64	$7.91
Retail/Entertainment	350 sq. ft./Employee	$1.89	$5.65
Hotel/Lodging	500 sq. ft./Employee	$1.32	$3.95

Source: Keyser Marston Associates

Total child care linkage costs are provided with and without land in recognition that some child care centers may be developed on land either donated or already owned by the City. To reflect the mix, an average linkage cost for the two assumptions is recommended for establishing the maximum ceiling. Results are as follows

Office	$5.27
Retail/Entertainment	$3.77
Hotel/Lodging	$2.64

These are the total child care linkage costs for workplace buildings and child care center facilities. These costs, also referred to as total nexus costs, represent the legal ceiling for potential fees supported by this analysis. These are not recommended fee levels. The City may set fees at any level below these nexus costs. Section VI of the report provides additional materials for assisting in selecting fee levels.

F. Building Area and Child Care Demand

The relationships between employees, child care demand and building area have other potentially useful applications beyond the setting of fee maximums. KMA recommends that the City offer a build option as an alternative to paying fees. In addition, the City may wish to require the construction of a child care center for a very large project.

For example, if the City determines that a minimal optimal size child care center is 75 children, it is possible to determine how large the project needs to be to warrant 75 child care spaces.

75 spaces/35.68 spaces (per 1,000 employees) = 2.102 times

Office:	250,000 sq. ft. x 2.102 = 525,500 sq. ft.
Retail:	350,000 sq. ft. x 2.102 = 735,700 sq. ft.
Hotel:	500,000 sq. ft. x 2.102 = 1,051,000 sq. ft. (2,102 rooms)

In other words, this analysis uses relationships that suggest that an office project of 525,500 square feet would generate demand for a child care center for 75 children. For the same size child care center, a retail and/or entertainment project would need to be 737,700 square feet, or a hotel of a little over 2,000 rooms.

Other ways of expressing the relationship are as follows:

- Office: 1 child care space per 7,007 sq. ft. building area or 0.000143 child care space per square foot building area.
- Retail: 1 child care space per 9,809 sq. ft. building area or 0.000102 child care space per square foot building area
- Hotel: 1 child care space per 14,013 sq. ft. or 0.000071 child care space per square foot building area

Another application relates child care center space to project area space. It is recalled that the average child care center is 70 sq. ft. of building area per child. If the 75-space child care center is for an office building of 525,500 sq. ft., the child care center size requirement is 5,250 sq. ft. (75 x 70 sq. ft. per space) or roughly 1% added to the building area. For the three building types, the ratios are as follows:

Office – 1%
Retail – 0.7%
Hotel – 0.5%

In summary, child care center demand conclusions can be used to relate child care center space to commercial projects for other purposes, such as negotiating Development Agreements.

TABLE 11

COMMERCIAL BUILDING ACTIVITY IN SANTA MONICA
CHILD CARE LINKAGE PROGRAM
CITY OF SANTA MONICA

ANNUAL COMMERCIAL BUILDING ACTIVITY (SQUARE FEET)[1]

	Hotel	All Other Commercial	Total
1990	0	90,000	90,000
1991	0	224,359	224,359
1992	0	10,904	10,904
1993	0	10,652	10,652
1994	0	91,522	91,522
1995	0	92,881	92,881
1996	0	15,192	15,192
1997	0	27,031	27,031
1998	0	400,198	400,198
1999	0	580,816	580,816
2000	39,381	53,872	93,253
2001	0	67,209	67,209
2002	0	54,553	54,553
Total	39,381	1,719,189	1,758,570
1990-1999			
Total	0	1,543,555	1,543,555
Average	0	154,355	154,355
1995-2000			
Total	39,381	1,169,990	1,209,371
Average	6,564	194,998	201,562
1990-2002			
Total	39,381	1,719,189	1,758,570
Average	3,029	132,245	135,275

[1] Data provided by City staff on March 10, 2003 and is based on building permit activity. Includes large projects subject to development agreements.

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SECTION V – SUMMARY OF LINKAGE ANALYSIS AND CONCLUSIONS

Section V summarizes the child care linkage fee analysis described in Sections I–IV. Those sections explain the multi-step analysis undertaken to quantify the demand for child care by employees in Santa Monica and the costs to mitigate child care demand, in terms of the provision of new child care center spaces. The analysis is conducted for a "universe" of 1,000 employees for ease of understanding and avoidance of awkward fractions associated with an analysis on the per employee or per household level. The findings of the demand analysis and linkage costs are summarized below.

A. Demand Analysis

The demand analysis estimates the number of children who require child care for a given universe of 1,000 employees. Demographic information is drawn from the U.S. Census 2000 series for the County of Los Angeles, since workers in Santa Monica come from the larger area.

- From a universe of 1,000 employees, there are 694.11 employee households, reflecting the fact that most households contain more than one worker or employee.

- In the 694.11 employee households, there are 183.18 children age five and under (actually half of all five year olds).

- Of the 183.18 children age five and under, 140.21 need child care due to the situation that all parents in the home are working.

- Of the 104.21 children needing child care, the demand for spaces in child care center facilities is 47.57 spaces (14.85 infant and toddler spaces and 32.72 pre-school spaces), based on national surveys for children of these age groups.

- National surveys suggest that 75% of demand for child care center space for preschool children is for centers located near the parent's workplace. As a result, the demand for spaces in child care centers located near the workplace is 35.68 spaces (11.14 infant and toddler spaces and 24.54 preschool spaces).

The conclusion of the demand analysis is that for 1,000 employees, the demand for spaces in child care centers near the workplace is 35.68 spaces.

B. Mitigation Costs Analysis (2005)

The mitigation costs analysis estimates the cost of providing new child care spaces in Santa Monica and then translates these costs into total linkage costs.

- A prototypical child care center and its development cost in Santa Monica was analyzed. In addition, cost experience was drawn from a survey of other West Los Angeles Area child care centers. The finding is that the cost to develop a new child care center in Santa Monica in 2005 is approximately *$18,500 per space without land, or $55,400 with land or, averaged together, $36,950.*

- The total mitigation cost for 1,000 employees is calculated by multiplying the number of child care center spaces in demand (35.68) by the cost of development per child care center space:

  35.68 x $36,950 = $1,318,380 for 1,000 employees

  The mitigation cost allocated to each of the 1,000 employees is $1,318.

- Further analysis relates the per-employee cost to building space based on density of employment. Since density varies by type of building and the activity within it, there are different density factors for each of the three building types:

Office	250 sq. ft. per employee
Retail	350 sq. ft. per employee
Hotel	500 sq. ft. per employee

  When the cost per employee is divided by the number of square feet per employee, the result is a cost per square foot of building area as follows:

Office	$5.27 per sq. ft. ($1,318 ÷ 250)
Retail	$3.77 per sq. ft. ($1,318 ÷ 350)
Hotel	$2.64 per sq. ft. ($1,318 ÷ 500)

  These costs per square foot express the cost to mitigate the demand for space in child care centers through the construction of new child care center spaces in Santa Monica. These are the total linkage costs and represent a ceiling below which fees may be set.

SECTION VI - MATERIALS TO ASSIST IN DESIGNING A FEE PROGRAM FOR SANTA MONICA

A. Overview

This section provides information to assist policy makers in selecting an appropriate Child Care Impact Fee level and mitigation program for Santa Monica. As indicated at the end of the previous sections, the linkage analysis establishes maximum supportable fee levels. Recognizing a variety of City objectives, policy makers may set the fee or other obligations at any level below the maximum.

The conclusions of the analysis on child care linkage costs for three types of commercial projects discussed in Section V are restated below. These are the maximums below which fee levels may be considered for different buildings:

Office – $5.27 per square foot
Retail/Entertainment – $3.77 per square foot
Hotel – $2.64 per square foot

1. Thresholds and Exemptions

Before evaluating alternative fee levels, it is helpful to recognize that a linkage fee program and governing ordinance may contain features to address specific concerns and policy objectives. The most important features are minimum size thresholds and exemptions.

A minimum size threshold sets a project size over which fees are in effect and exempts or reduces fees on smaller projects. Very large cities with high fee structures (multiple fees at substantial levels) tend to set thresholds at the 25,000, 50,000 or even 100,000 square foot level. Smaller cities typically establish thresholds at 10,000 or 25,000 square feet. Some programs have no thresholds. For consistency, Santa Monica may want to consider a threshold that is the same as for other development standards or fees. The Development Review threshold is currently 7,500 square feet. The Housing and Open Space Fee reduces the fee for the first 15,000 sq. ft.

A number of policy objectives can be accomplished through the minimum thresholds. If there are older commercial areas for which small-scale infill is a City objective, a minimum threshold will avoid or reduce the cost for small projects. If mixed-use projects are being strongly encouraged, again a minimum would benefit many such projects.

Exemptions of several sorts can also be added to the program. Specific geographic areas are sometimes identified as warranting special treatment by the City or specific building types may be exempted.

Finally, it should be noted that the ordinance will likely contain a provision to address demolition of existing structures, recognizing that the prior structure had child care impacts and the replacement structure should only address net new impacts. Similarly, when very low employment density type structures are renovated for newer higher employment density activities, adjustments are in order. The classic example is the warehouse that is renovated for an office or film production activity.

B. Other Santa Monica Impact Fees and Total Development Costs

Policy makers usually wish to consider the design and level of a new fee in the context of existing fees already in place and in the context of total development costs within the jurisdiction. This section briefly summarizes Santa Monica impact fees and development costs, particularly land, within the city and evaluates the relationships.

1. Other Impact Fees

The City of Santa Monica was one of the first in the State to adopt a jobs housing or affordable housing impact fee and also an open space impact fee. These were adopted in 1984 and have been adjusted periodically since then using a Consumer Price Index. The fees apply to office projects only. The fee level is quoted as a single fee and, as of the date of report preparation (2005), is as follows:

- $4.37 per square foot for the first 15,000 square feet; and
- $9.72 per square foot in excess of 15,000 square feet.

In addition, the City has a "fee" schedule to cover a broad range of planning and processing services associated with the development process. These are not impact fees per se, but are noted because they are reportedly high relative to other cities and do add to the costs of development in Santa Monica.

A child care fee would be an impact fee similar to the affordable housing and open space fee and in addition to the levels noted above.

2. Land Costs in Santa Monica

A brief discussion of land costs in Santa Monica as a key component of total development costs is relevant because, in theory, land value adjusts downward to reflect the added cost burden imposed by the City. Most development costs, such as hard construction costs, and most

indirect and financing costs are relatively fixed, or not subject to adjustment as a result of local policies. Land value is the variable in the development equation that adjusts to reflect the income capacity of market forces, given the fixed costs of development. Rents and building values generally act independent of costs of development. They are driven by the market attraction of the location and the strength of the regional economy. If costs are increased as a result of a local fee, land values are theoretically decreased by a corresponding amount.

The relationship between the fee cost and the land value is a function of the project density or Floor Area Ratio (FAR). With an FAR of 1:1, the building area square footage is equal to the site area. A building with an FAR of 2:1 is a building with twice the floor area as the parcel size, meaning the fee impact theoretically is doubled in its diminution of land value. Most commercial or mixed-use projects in Santa Monica are developed to an FAR in excess of 1:1. (Usually parking is kept out of the equation — impact fees are not charged on structured parking square footage and parking is not counted in the FAR.)

The word "theoretically" is dispersed throughout the discussion. In the real world, other forces, most particularly market demand, drive land values far more powerfully than do fees. Land values have escalated substantially since the mid-1990s and despite the recession in office markets, land values have not come down in locations such as Santa Monica.

To obtain an overview of values in Santa Monica, KMA considered several sources. KMA obtained data on 15 land purchase transactions, which have occurred since late 1999. These transactions covered all areas or zip codes of the City. In addition, KMA talked with the City about general conditions and trends. From this limited investigation, KMA concludes that land values are predominantly over $100 per square foot and in some locations over $200 per square foot. The low end of the range for properties without significant problems is around $80 per square foot. (2003)

At $100 per square foot each dollar of impact fee is a 1% impact on land value at a 1:1 FAR and 2% at a 2:1 FAR. Areas with a development potential of higher than 2:1 FAR due to zoning have land values considerably over the $100 average used in the example. As a result, the impact of each dollar of fee is probably no greater than 2% of land value at any location in Santa Monica.

Finally, as an observation, Santa Monica may be a city with a high fee structure (both impact fees and processing fees), but it is also a city with a very high land value structure. There is no evidence that the fee structure thus far has had a depressing impact on land values. It is likely that the development community views other difficulties in pursuing development projects in Santa Monica, such as limited land, as being more significant and more costly than the fees.

3. Total Development Costs

Total development costs for all types of projects in Santa Monica are higher than in most other portions of the metropolitan area for a combination of reasons.

- The land cost structure reflecting the high desirability of virtually all locations in Santa Monica and the strong market conditions and income capacity resulting there from.
- High construction costs resulting from most projects being built at urban type densities on sites of constrained size. Staging areas for construction are also minimal, adding to costs.
- Parking requirements, which in combination with the density and land costs, means virtually all parking is now located in structures of one sort or another, often subterranean.

As a result of these factors, it is virtually impossible to complete a development project for less than $300 per square foot "all inclusive." This cost is inclusive of land, construction, site costs, and all indirect costs including financing in 2003. Average development costs "all inclusive" generally fell in the $300 to $400 per square foot range.

In the context of total development costs, each dollar of impact fee has a minor impact — under 0.35%.

To restate KMA's conclusion on land values: market pressures have a far greater impact on land values than fees in the Santa Monica real estate market. According to the Housing Element, land costs escalated 31% to 56% during the 1997 to 1999 period alone, and land costs have continued to rise since that time. A child care fee would not be of a magnitude to significantly alter land values in Santa Monica.

C. Child Care Linkage Programs in Other Jurisdictions

It is always of interest to decision makers to know what other cities and counties have in place in the way of similar programs. KMA assembled information on child care linkage programs in California and elsewhere, following a search using the internet, the California League of Cities, and other sources such as a State Housing and Community Development publication entitled *Pay to Play*.

The chart, Table 13 at the end of this section (updated for 2005), summarizes the major provisions of ordinances in 15 California jurisdictions plus a specific plan area. Some of the main points of interest are:

- All of the jurisdictions with the exception of West Hollywood and Palm Desert are in northern California.

- The highest fee level in California on non-residential construction is in Palm Desert, at $1.15 per sq. ft. for office space, adopted in 2005. San Francisco, Berkeley and San Mateo all have fees of $1 per sq. ft. The next highest is Martinez at $0.85, followed by West Hollywood at $0.65. All others are lower yet.

- Many programs have a parallel charge on residential construction.

- A few programs also fund operating expenses and subsidies for lower income families.

- Most programs have thresholds and exemptions of some sort.

- Seattle has a recently adopted a child care linkage program which only applies to the downtown area, and only to large hotels and office projects. The charge is $3.25 per square foot on the bonus area (above a base FAR) or equivalent to $1.50 to $2.00 if applied over the total building area.

KMA is familiar with several jurisdictions that are considering adding a child care linkage program and of those that have them now, some will be doing an update within the next few years. None of the programs have been challenged in court, to KMA's knowledge.

D. Child Care Fee Collection Projection

Policy makers and planners like to have information on the approximate amount of funding a program will generate, given certain assumptions. This can be done by examining the annual level of construction activity and projecting it forward to determine funding for each dollar of fee.

1. Commercial Construction

Santa Monica is a built-out city without a substantial amount of construction activity, residential or non-residential. City staff assembled data on commercial construction every year since 1990 (Table 11). This information was presented in Section IV. Commercial construction averages for various timeframes since 1990 are as follows:

	Non-Residential
1995-2000	201,562 sq. ft./yr.
1990-1999	154,562 sq. ft./yr.
1990-2002	135,275 sq. ft./yr.

For purposes of looking forward, generally the longer timeframe provides a more useful average. The 1990s decade was a particularly good decade for projection purposes because during the first half of the decade the economy was in recession and the second half of the decade was a period a vigorous expansion. Since 2000, the office market has been in recession, so for purposes of projection, KMA believes 150,000 sq. ft. per year is a good average.

In Santa Monica very large projects are typically negotiated with the City and become subject to Development Agreements. Of the approximately 1,760,000 sq. ft. developed since 1990, over 700,000 of it was in Development Agreement projects. Without these projects, the average activity would drop to around 77,000 sq. ft. per year. For projection purposes, KMA would argue that much of this activity probably would have happened in other projects and further, looking ahead, Santa Monica will probably have at least one or two large Development Agreement projects per decade on average.

KMA recommends a projection range of 100,000 to 150,000 per square foot per year. From there one can examine the amount generated for every dollar of fee, or say, a $1, $3 and $5 per square foot fee range.

	$1 Fee	$3 Fee	$5 Fee
100,000 sq. ft. per year	$100,000	$300,000	$500,000
150,000 sq. ft. per year	$150,000	$450,000	$750,000

Working from the mid ranges of both fees and construction activity, KMA brackets the proceeds from the program at roughly $250,000 to $450,000 per year.

The above projection range implies two major conditions:

- That the fee will be applied to all commercial type construction — office, , retail, entertainment, hotel, etc. This is not consistent with the current housing and open space fee.
- That the fee program will not include exemptions or reductions for smaller projects. Again, the City's other impact fee programs do include reductions.

2. Fund Capacity vs. Costs

On an order of magnitude level, it is helpful to look at the probable linkage program fund in light of linked child care costs, or in this case, child care center facility costs. It was established that the average cost per child care center space is $36,950 on average. (2005)

If an adopted linkage program generates $250,000 to $450,000 per year, then roughly ten new child care center spaces could be developed each year. Or, if the desired size of a child care center is 75 children, the City could fund development of a new center every seven or eight years.

E. Santa Monica Development Agreements – Child Care Provisions

The City of Santa Monica has negotiated with the developers of large projects over the past 20 years for child care payments or other provisions as part of the condition of approval for the project. Commencing with the Colorado Place agreement in 1981, the City has worked out child care mitigations on seven large scale projects.

The chart at the end of this section (Table 14) summarizes the seven agreements. It appears that four agreements have called for the provision of a child care centers of varying sizes:

- National Medical Enterprises (now MTV) project – 60 child care spaces
- Colorado Place – a 2,000 sq. ft. child care center (about 28 spaces)
- Water Garden – 3,500 sq. ft. initially, 7,000 sq. ft. by later phase (about 100 child care spaces)
- Saint John's Hospital Expansion – a center for 49 children of which 21 must be infants/toddlers

In addition, the Rand Corporation agreement calls for an expenditure of $500,000 toward a child care center.

Most of the agreements specify that the project will give first preference to employees and/or tenants. A second priority for enrollment is City residents. The Water Garden and Saint John's require that a portion of spaces (10% and 25% respectively) be made available to the children of lower income families.

These development agreements represent individual negotiations independent of a City policy or program to guide consistency of requirement. As such, they provide little guidance for future development agreements other than the precedent for requiring a child care mitigation in concept.

F. Recommendations for a Child Care Linkage Fee Program for Santa Monica

Drawing from the findings of the linkage analyses and from the materials in this section of the report, the following findings listed below are offered as a guide:

- The maximum child care fee levels supported by the linkage analysis are as follows:

  Office - $5.27 per square foot
  Retail/Entertainment - $3.77 per square foot
  Hotel - $2.64 per square foot

- The fee levied by the City should be under the maximum amount supported by the analysis. KMA always recommends a margin to allow for minor changes in conditions, different findings from new surveys, or other adjustments that might invite challenges to the fee level. With a margin, challenges are discouraged.

- Based on the high land value structure in Santa Monica and high costs of development, fees at virtually any level below the maximums established by the linkage analysis will have only a negligible impact on development costs and land values and will not significantly alter development attraction in Santa Monica.

- Given the low volume of commercial development activity in terms of new square footage added each year, fees should be at least $2.00 per square foot in order to accumulate enough funds to follow through on the purpose of the fee — to increase the supply of child care center spaces in Santa Monica.

- For consistency, the City may wish to use the 7,500 sq. ft threshold for Development Review or the 15,000 sq. ft threshold for the office Mitigation Fee. Alternatively, the City may wish to reevaluate all thresholds in light of the average size of projects processed through the City and consider a different level to capture more activity.

- KMA recommends that the Child Care Fee be applied to all commercial projects and that the City reevaluate expanding its Office Mitigation Fee to similarly include retail and hotel type projects. Retail and hotel projects are notably intensive in very low paying jobs.

- KMA recommends that the ordinance include a provision for building child care center spaces as an alternative to paying a fee. The build option could include contributing to a child care center being developed by other sponsors, profit and/or non-profit. Rehabilitation of existing buildings for child care centers should also be permitted within such an option. The build option should be in similar proportion to the linkage finding as the fee is to the linkage maximum.

TABLE
CHILD CARE LINKAGE PROGRAMS IN OTHER JURISDICTIONS
CHILD CARE LINKAGE PROGRAM
CITY OF SANTA MONICA

Jurisdiction	Year Adopted	Current Fee Levels	Exemptions[1]	Build Option/ Other	Fee Uses	Comments
City of West Hollywood	1989 (updated 2001)	$0.65 / sq ft non-res	<10,000 sq ft	Provide 1 sq ft indoor space per 470 sq ft new commercial floor area plus 1 sq ft outdoor space per 219 sq ft. (Min total 2,100 sq ft indoor & 4,500 sq ft outdoor space).	Provide new child care spaces via new construction, expansion and/or lease.	Goal to construct 7,665 sq ft of indoor & 16,425 sq ft of outdoor child care space over 20 years. Construction includes extensive rehab (50% of replacement value). Commercial development fee also required for affordable housing, public open space and transportation facilities.
City of Palm Desert	2005	$1.15 / sq ft office $0.90 / sq ft comm'l $0.77 / sq ft hotel $0.47 / sq ft business parks & light industrial	Does not specifically exempt schools, non-profits, or public property.	Provide facility sufficient to satisfy their generated impact.	New child care spaces via new construction or expansion. Improvements to existing child care spaces.	
City and County of San Francisco	1986	• $1 / sq ft office and hotel in downtown	< 50,000 sq ft < 6 hotel rooms	Provide on-site facility (min 3,000 sq ft) to be operated by nonprofit at no cost. On-site facility size 1% of project building area.	Increase supply of facilities to low and mod income households. (25% of funds to provide subsidies for first 3 years)	Large office projects must provide on-site referral/placement services.
City of South San Francisco	2001	• $1,736 / unit SF • $1,630 / unit medium density • $1,624 / unit high density • $0.60 / sf commercial/retail • $0.50 / sf R&D office • $0.16 / sf hotel • $0.47 / sf other non-res.	Affordable housing and senior housing may apply for a waiver. No other exemptions. Additions <1,000 sf exempt.	May provide facility.	Establish new childcare spaces.	The city's goal is to satisfy fifty percent of the city's existing and future childcare needs by the year 2020 (4,784 additional childcare space, of which 1,176 are associated with new development and will be funded by the fee).
City of Berkeley	1992	• $1 / sq ft office/retail • $0.50 / sq ft industrial Intensified use (per net new employee; not to exceed $1/ sq ft for total project size) • $525 / new office empl • $615 / new retail empl • $500 / new industrial empl (not to exceed $0.50 /sq ft)	<7,500 sq ft Exempts South Berkeley Target Area	May provide on-site project. Fee will be dedicated to the child care operator at the specific site, in return for req. subsidized spots with priority to project's new employees	Provide subsidies to residents with income <60% Area Median Income.	Non-profit and public sector spaces are not exempt.

[1] Unless otherwise noted, ordinance exempts child care or school facility, non-profit or public property, senior or affordable housing and repairs, replacements or additions if a new bedroom is not created.
Abbreviations: SF – Single family; MF – Multi-family; Sq ft – Square feet; Res - Residential
Prepared by: Keyser Marston Associates, Inc. 19305.005\001-016

TABLE 13
CHILD CARE LINKAGE PROGRAMS IN OTHER JURISDICTIONS
CHILD CARE LINKAGE PROGRAM
CITY OF SANTA MONICA

City of Martinez	1990	• $830 / unit SF • $221 / unit condo • $166 / unit apt • $0.85 / sq ft office • $0.29 / sq ft retail • $0.36 / sq ft manuf • $0.45 / sq ft comm. service	See footnote	May pay fee equal to land and construction cost. Min. size of 110 sq ft land per space and 35 sq ft bldg area per child (excl. common area).	Targets assistance for infants and after school care.	
City of Davis	1990	• $100 / res unit • $0.005 per sq ft industrial / commercial • $0.015 per sq ft for all other commercial uses	Also agricultural uses	Provide construction costs or land. Receive credit for future dev if exceed req.	Loans and land. Prohibits on-going operating and general maintenance expenses. Age target 0-12 years old	
County of Contra Costa	1988	N/A (res and non-res must provide child care facility)	<30 res units (excls studios and 1 bdrms) <100 employees OR <15,000 sq ft non-res	Provide facility on- or off site	Increase and/or supply facilities	Developer must provide child care survey to assess child care needs caused by project and a mitigation plan
County of Santa Cruz	1991	• $328 / unit SF • $0.328 / sq ft SF addition (between 500-1,000 sq ft) • $108 / unit MF • $0.108 / sq ft MF addition • $0.12 - $0.23 / sq ft non-res use	Also agriculture uses	Provide facility on- or off site. Dedicate land to County or nonprofit to develop child care facility Subdivisions with < 19 units may only pay fee	Grants or loans to purchase, construct or rehab facility.	Targets preschool and school age thru 12th grade. Admin costs limited to 7% of fund.
City of Concord	1985	• 0.5% of total development costs for non-res uses	< $40,000 bldg. permit value	Provide on-site facility or contribute to non-profit provider facility. Receive credit for future dev if exceed req.	"Child Care Alliance for Resource and Development" allocates funds for direct subsidy, training, loans and after school rec program.	
City of San Ramon	1988	• $210 / unit plus 5% of total res fee • $0.10 / sq ft plus 5% total non-res fee • Mixed use - apply fee for each use plus 5% total fee	< 1 bedroom or 2nd unit <2,500 sq ft non-res space	Provide facility	Provide school age child care on school sites owned by San Ramon USD according to need	

[1] Unless otherwise noted, ordinance exempts child care or school facility, non-profit or public property, senior or affordable housing and repairs, replacements or additions if a new bedroom is not created.
Abbreviations: SF – Single family; MF – Multi-family; Sq ft – Square feet; Res - Residential
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TABL
CHILD CARE LINKAGE PROGRAMS IN OTHER JURISDICTIONS
CHILD CARE LINKAGE PROGRAM
CITY OF SANTA MONICA

City of Danville	1989	• $335 / unit SF • $115 / unit MF • $0.25 / sq ft non-res uses	SF remodels 2nd units < 2,500 sq ft non-res	Must provide facility if res project exceeds 50 units	In priority: School age facilities in elementary schools. Purchase land to develop pre- or school age facilities	Goal to achieve ratio of 1 child care space per 40 Town residents. Fee applies building conversions and expansions
City of San Mateo	2004	• $1.00/ sq. ft non-res. uses	<10,000 SF.		Fund new facilities; joint venture with non-profits; provide low or no interest loans.	Fee applies to new construction and tenant improvements.
City of West Sacramento	2003	• Res: $50/ unit (<600Sq Ft) • $150/unit (601-1000 Sq Ft) • $250/unit (1001-1400 Sq Ft) • $400/unit (>1400 Sq Ft) • $0.40 / sq ft office • $0.30 / sq ft retail • $0.12 / sq ft industrial • $0.12 / sq ft hotel	Not currently specified.	Provide facility on-site or off-site; may donate land; may provide financial assistance for new facility; combination of the above.		
City of Los Angeles (Central City West Specific Plan)	1991	Commercial/industrial must provide facility with min size req: • 40,000–99,999 sq ft reqs 2,000 sq ft facility • 100,000–499,999 sq ft reqs 4,000 sq ft facility • 500,000–999,999 sq ft reqs 8,000 sq ft • 1 mil+ sq ft reqs 12,000 sq ft	<40,000 sq ft	• On-site facility req if bldg <500,000 sq ft • 500,000–999,999 sq ft may provide one on- and one off-site location within ½ mile • 1mil+ sq ft may have 3 locations, with at least one 4,000 sq ft on-site, remainder within ½ mile	30% of slots reserved for low and very-low income households who live within Specific Plan area	May combine with other facilities
City of Seattle (Downtown only)	2001	$3.25 per sq ft bonus areas on office and hotel. Equates to $1.50-$1.75 on total bldg. area.	N.A. Program only applies to large projects.	May build; each sq ft bldg. area .000127 child care spaces	Build new facilities and existing City subsidy program	Linkage program applies only to portion of bldg. over base entitlement. Analysis based on cost of child care centers and City subsidy program.

[1] Unless otherwise noted, ordinance exempts child care or school facility, non-profit or public property, senior or affordable housing and repairs, replacements or additions if a new bedroom is not created.
Abbreviations: SF – Single family; MF – Multi-family; Sq ft – Square feet; Res - Residential
Prepared by: Keyser Marston Associates, Inc. 19305.005\001-016

TABLE 14
MAJOR PROJECTS IN SANTA MONICA
DEVELOPER AGREEMENTS WITH CHILD CARE OBLIGATIONS
CHILD CARE LINKAGE PROGRAM
CITY OF SANTA MONICA

PROJECT BACKGROUND			CHILD CARE OBLIGATIONS					NOTES
Project Name/Developer	Development Agreement Year	Development Program	Child Care Center Size	Tuition	Required Costs/ Contributions	Enrollment Eligibility		
						Preference	Income	
Colorado Place I & II MGM current occupant	1981	900,000 sq ft office	Interior: 2,000 sq ft; Approx. 28 spaces*		Max $5,000 for improvements			Annual operator lease payment is $1. Current operator: Hill & Dale
National Medical Enterprises (NME) MTV current occupant	1982 (amended 1987)	312,000 sq ft office & 30 res units	60 spaces; must provide some infant care		Provide indoor furnishings and equipment or pay City ($2,000 min). Outdoor furnishings $3,000	1st Employees and tenants; 2nd City residents	"Affordable" child care to any income employee	Annual operator lease payment $1. Minimum occupancy requirement is 85%. Current operator Evergreen
Arboretum Southmark Pacific Corporation	1987	1 M sq ft supermarket, office & res			$250,000 (min. $50,000 annual)?			Funds must primarily meet child care needs of Pico and Mid City neighborhoods.
Water Garden JH Snyder Co.	1988	1 M sq ft office, medical, health club & retail	Interior: 3,500 sq ft; Exterior: 3,500 sq ft; must provide some infant care			Employees. 10% of spaces reserved for designated neighborhood residents.	10% income qualified to pay 60% of market rate tuition based on need	Current Operator: Cornerstone
St. John's Hospital	1997	900,000 sq ft hospital expansion	49 full day spaces (Min 21 infant/toddler spaces)	Tuition may not exceed tuition fo full day non-profit programs in Santa Monica with comparable quality/services		1st Employees and tenants; 2nd City residents; 3rd Employees in the City	Tuition for lower income family not to exceed 25% of market rate	Minimum occupancy requirement is 85%. Project Phase II demand-provide expanded program on or off campus. Current Operator: St. John's
Rand Corporation (replacement and expansion project)	2000	500,000 sq ft office	Infants thru preschool	25% of annual dispursement to provide subsidy on sliding scale. Lowest income has first priority.	$500,000 for future development of a child care center?	1st Employees and tenants; 2nd City residents		Lab school for early childhood development activities

*Estimate based on other information.
Each agreement requires developer to provide an implementation plan and includes provisions for operator successor process.
Each program must comply with State requirements.

Source: City of Santa Monica (portions of agreements provided)

Prepared by: Keyser Marston Associates, Inc. in 2003
Filename: 19305.005\DDAs.xls

APPENDICES A, B, C, D

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APPENDIX A
GLOSSARY OF CHILD CARE AND DEVELOPMENT TERMS

A/E (also A&E) – Architect/Engineer. Common abbreviation for the architects and engineers (including mechanical, electrical, structural and civil engineering consultants).

Building Coverage – See Floor Area Ratio.

Building Permit – The local government's demonstration that it has reviewed development plans for compliance with local codes and given permission for construction to proceed.

California Education Code – Sections of the California Education Code pertain to child care and development programs serving children part day or full day. Specifically, Section 8208 address programs that offer a full range of services for children from infancy through age 13, for any part of a day, by a public or private agency, in centers and family child care homes. Section 8263 clarifies child eligibility for state subsidized child care and development services.

Capital Cost – Money spent to improve a property and enhance its value over an extended period of time (as opposed to a repair).

Capitalization Rate – A discount rate (expressed as a percentage) used to determine the present value of a stream of future income (or expenditures). For instance, to establish a reasonable purchase price for a given investment property, investors, lenders and appraisers may utilize a capitalization rate to discount a stream of future rental income.

A capitalization rate was utilized in the Child Care Linkage Fee Analysis for the purpose of estimating a one-time charge to address the impacts of new development over the life of a building. As such KMA capitalized the City's annual child care and youth expenditures at a rate of 10%. This rate is within the finance industry's acceptable range.

CCR – California Code of Regulations.

Child Care Center – Any child care facility of any capacity, other than a family child care home, in which less than 24 hour per day non-medical care and supervision are provided to children in a group setting in accordance with CCR, Title 22, Section 101152. In Santa Monica, the Santa Monica-Malibu School District (SMMUSD) runs full time and part-time centers for pre-schoolers (Child Care in Santa Monica, September 2000.)

Child Care Linkage Fee – A linkage fee to mitigate the impacts on child care demand associated with building development and new workers or residents.

Construction Cost – The cost of constructing the building, including all direct costs of construction, plus contractor's profit and general conditions.

Child Care Recreation, Enrichment, Sports Together (CREST) – Eight after-school programs jointly administered by The Santa Monica-Malibu School District and the City of Santa Monica for school age youth.

Development Agreement – A legal contract between a public agency and a developer that includes conditions and terms for the development of a project.

Development Cost – The sum of all costs for planning, administration, site acquisition, relocation, demolition, construction, tenant improvement allowance and equipment, all financing related costs, on-site streets and utilities, a contingency allowance, insurance premium, any off-site costs required, any initial operating deficit, and all other costs necessary to develop the project.

Direct Costs -- Costs directly related to the construction of a project, including site acquisition, demolition, construction, tenant improvements, landscaping, etc.

Employee Density Factor – A measure of the average building space occupied by a single employee. Calculated by dividing the total building area by the total number of employees employed in the building.

Family Child Care Homes (FCCH) – Child care facilities operating out of individuals' homes. They are categorized as either small (serving up to 8 children) or large (serving between 9 and 14 children. FCCHs can serve a combination of pre-schoolers (including infants) and school age children.

Floor Area Ratio (FAR) – A comparison of the total area of a building with the total area of the land upon which it stands. Maximum or minimum FARs may be established by local zoning codes.

Federal Poverty Level – A minimum income level below which a household is officially considered to lack adequate means for subsistence and to be living in poverty. The U.S. Department of Health and Human Services annually updates the poverty guidelines by the Consumer Price Index.

Housing Element – One of the mandatory elements of a General Plan of a City or County, the Housing Element identifies the needs and present options for the production of housing in acommunity.

Impact Fee – Charge levied on developers by local government to pay for the cost of providing public facilities necessitated by a given development or to otherwise lessen the negative impact of development upon the public. Also referred to as an exaction or governmental fee.

Indirect Costs –Costs not directly related to construction, e.g., leasing and brokerage commissions, marketing costs, design and other professional service costs, property taxes during construction, development management and governmental fees and financing costs (e.g. *loan points, interest expense*). Also known as "soft costs."

Infant – Children from birth to two years (CCR, Title 22, Section 101152). However, for purposes of their programs, Santa Monica recognizes infants as children from birth to one year.

Licensed Child Care – Child care programs in a center or provider's home which follow state regulations for staff-to-child ratios, education standards, program structure and facilities. Programs are regulated by the Department of Community Care Licensing in the California Department of Social Services (CCR, Title 22, Section 10152) or administered under the State Department of Education under Title 5 of the CCF.

Mitigation Fee Act, AB 1600 – Legislation that amended California Government Code, Section 66000, requiring that local government demonstrate a linkage between the amount of a fee, the fee's purpose, and the type of development on which the fee imposed.

P.S.F. – Per Square Foot

Pre-school Programs – In Santa Monica, pre-school programs serve children from two to five years. Includes subsets of children of different ages with different state regulations associated with them. (Child Care in Santa Monica, September 2000)

Pre-schooler – According to the Health and Safety Code, pre-school children are children who are not infants, toddlers, or school age (Section 1597.059).

Project Cost – *See Development Cost.*

Rehabilitation – The improvement, alteration, modernization or modification of an existing structure to make it safe, sanitary and decent and/or to bring it up to Building Code Standards.

Santa Monica Programmatic Costs/Santa Monica Scholarship Programs – Funds available to help lower and moderate income households residing in Santa Monica to meet their child care needs (Connections for Children Program and The Growing Place).

School Age Children – Children of kindergarten age through grade five. (Child Care in Santa Monica, September 2000).

Toddler – A child between the ages of 18 months and 30 months (CCR, Title 22, Section 101152).

Total Development Costs – See Development Costs.

Universe of Employees – A grouping of individual employees for analysis purposes. In this analysis the "universe" of employees is comprised of 1,000 employees.

APPENDIX B - THE DEMAND FOR CHILD CARE ASSOCIATED WITH RESIDENCES

This appendix provides an analysis of the linkage between residential development and child care demand, similar to the analysis provided in Section II of the main report on workplace building construction and child care demand. This analysis is in the appendix because KMA recommends that the City not proceed with a child care impact fee on residential development at this time.

A. Santa Monica Residents – Demographic Profile and Growth

A first step before embarking on the residential demand analysis is to review the demographic profile of Santa Monica residents. The data source is the U.S. Census 2000 series for the City of Santa Monica. Santa Monica demographic characteristics are appropriate for describing households and the propensity to have children in them, whereas for workplace buildings one could look to the characteristics of the greater Los Angeles area because only a small share of those who work in Santa Monica also live there. Santa Monica characteristics are notably different from the larger Los Angeles area. Some of the highlights presented in Appendix Table B-1, at the end of this section, are:

- Only 16.8% of Santa Monica households contain children under age 18. (This may be compared to over 41% for Los Angeles County.)
- Fewer than 5% of Santa Monica households contain children of preschool age.
- Santa Monica did not experience growth in population or households over the 1990 to 2000 decade.
- Overall the number of children under age 18 in Santa Monica grew slightly over the decade, by about 5% (from 11,977 to 12,314).
- Santa Monica had fewer children under age 5 in the year 2000 than it did ten years earlier.

These statistics may be restated without the figures as follows:

- Santa Monica is a city with far fewer children on average compared to the larger Los Angeles area.
- There is no significant growth in the number of children and an actual decrease in the number of very young children (age 0-5).

A description of the demand analysis associated with households is provided in the next pages.

B. 100 Households – Children Needing Child Care

Like the workplace analysis, which utilizes a universe of 1,000 employees, the residential analysis works from a universe of 100 households in Santa Monica. Again, this approach is used to avoid having to describe children and child care demand in terms of fractional children carried to four or five decimal places.

Using Census findings, KMA developed factors to quantify the number of children by age group as relates to the type of child care service needed, for 100 households or 100 residential units (the difference between households and residential units being only a minor vacancy adjustment). Unlike the analysis of children of employees which is limited to preschool children, an analysis for residents can address children of all age levels for which the City provides care or assists with services for its residents.

The table below summarizes the incidence of children by age level and of children needing child care by virtue of parents being employed (two-parent households with both parents working and single-parent households with the single parent working). The last step adjusts for more than one child within the age group.

Appendix Table B-2
Child Care Demand for Households with Children in Santa Monica

Per 100 Households	Households by Age of Children					
	0-2	3 and 4	5	6-12	13-17	Total
Households with Children (Age 17 and under)						
Factor	2.99%	1.73%	0.91%	6.13%	5.06%	16.83%
Number	2.99	1.73	0.91	6.13	5.06	16.83
Households Needing Child Care (Parent(s) Employed)						
Factor	62.37%	62.37%	62.37%	73.00%	61.75%	
Number	1.87	1.08	0.57	4.47	3.13	11.12
Children in Employed Households Needing Child Care (Adjusts for more than one child in age group)						
Factor	1.09	1.06	1.03	1.06	1.11	
Number	2.03	1.14	0.59	4.73	3.46	11.95

Source: US Census, City of Santa Monica, 2000.

The conclusion is that for every 100 households, slightly under 12 children will have working parents and need child care or youth services, recognizing that "care" may not be an appropriate term for children over age 12.

C. How Child Care Needs are Met

The same national surveys and sources were consulted for this portion of the analysis as in Section II of the main report. Since there are no suitable surveys that allowed KMA to judge how the residents of Santa Monica might meet their child care needs in a different manner from the Country or State as a whole, KMA relied on the Urban Institute and UCLA surveys. Appendix Table B-3 restates from Section II the distribution of arrangements for child care by age of child:

Appendix Table B-3
Primary Child Care Arrangements of Employed Parents

	Age of Children		
	0-2	3 and 4	5
Per 100 Households			
Parent/Relative	54%	35%	38%
Child Care Center	22%	45%	40%
Family Child Care Home	17%	14%	11%
Before and After School	N/A	N/A	8%
Other	7%	6%	3%
	100%	100%	100%

Source: Urban Institute, *Primary Child Care Arrangements of Employed Parents: Findings from the 1999 Survey of America's Families,* Occasional Paper Number 59, May 2002.

For the purposes of this analysis and the City programs, the child care solutions of greatest interest are Child Care Centers and Family Child Care Home (FCCH) arrangements. The following findings from national surveys provide confirmation that demand for these two arrangements is probably higher in Santa Monica than for the State or County as a whole.

- Use of parents and relatives as a solution to child care decreases as household income increases. Based on the high income level in Los Angeles County compared to the U.S. as a whole, KMA estimates that far fewer families in Santa Monica use parents and relatives as a solution than the percentages indicated above.
- Use of center-based child care arrangements increases as household income increases.
- Use of "other" arrangements, which includes nannies and babysitters, is most expensive and, as would be expected, increases with household income.

As a result of the generally accepted findings from multiple surveys, it is likely that the use of parental and relatives arrangements are far fewer and "other" arrangements far greater than the average, but that the use of child care centers and FCCH's are probably akin to the national and State average, or higher.

Based on the above, KMA estimates the child care demand associated with 100 households in Santa Monica, as shown in Table B-4.

Table B-4
Child Care Demand by Type of Care in Santa Monica Per 100 Households

		Age of Children			
		0-2	3 and 4	5	Total
Children in Employed Households Needing Child Care (Table B-2)		2.03	1.14	0.59	3.76
Child Care Center					
	Factor	22.00%	45.00%	40.00%	
	Number	0.45	0.51	0.24	1.20
Family Child Care Home					
	Factor	17.00%	14.00%	11.00%	
	Number	0.35	0.16	0.06	0.57
Other					
	Factor	7.00%	6.00%	3.00%	
	Number	0.14	0.07	0.02	0.22

Sources: U.S. Census, Urban Institute, Primary Child Care Arrangements of Employed Parents: Findings from the 1999 Survey of America's Families, Occasional Paper Number 59, May 2002.

The conclusion of the above is that a universe of 100 households in Santa Monica is associated with the demand for 1.2 child care center spaces and 0.6 spaces in Family Child Care Homes.

D. Demand for Child Care Spaces Near Home

In Section II of the main report, KMA made an allocation of a Child Care Center to two generic locations — near place of work and near place of residence. The allocation for the preschool child was 75% near place of work, 25% near place of residence, based on findings from parent attitude surveys and other evidence.

At this point, to complete the analysis for demand for child care center spaces near homes in Santa Monica, KMA applied the 25% to the 1.2 children per 100 households.

- The conclusion is 0.3 child care center spaces per 100 households, or 0.003 per household.

E. Child Care Center Demand and Mitigation Costs

The cost to provide the 0.003 child care center space for each household in Santa Monica can be estimated following the cost analysis and methodology presented in the Report.

The conclusion of the survey and analysis (and 2005 update) for the cost of development of child care centers in Santa Monica is $18,500 per space excluding land and $55,400 per space including land. Applying the cost per child care center space to the 0.003 spaces per household results in a cost per household as follows:

Mitigation cost per household/residential unit, excluding land	$56
Mitigation cost per household/residential unit, including land	$166
Average	$111

F. Households and Residential Construction Correlation

The profile of Santa Monica demographics from the 1990 and 2000 U.S. Census, presented as the beginning of this section found that:

- The number of households actually decreased over the period, going from 44,860 to 44,497 households over the decade.
- The number of children under the age of five decreased from 4,048 to 3,448.

Over the same time period, residential building permits issued by the City of Santa Monica indicate that over 2,600 new residential units were added (Appendix Table B-5). With these two data series there is no correlation between new residential construction and growth in households and increased child care demand.

There are a number of possible explanations for these two seemingly contradictory sets of data. Among the possible explanations:

- Household size is decreasing on average.
- The rate of children growing up in Santa Monica and exceeding age 18 is occurring faster than the rate of new households with young children.
- The rate of residential unit demolition and units lost to consolidation of existing units are considerable.

Finally, it is possible that the Census is inaccurate or has undercounted in some manner. However, the U.S. Census is the mostly widely accepted body of data on such topics. If the City

were to challenge the Census information, substantial data and analysis would be required. Until such time, the Census must be viewed as the authoritative source.

Without the ability to make the case that each new residential unit equates to new demand for child care in Santa Monica, the linkage between new residential construction and child care demand cannot be supported at this time.

Should the U.S. Census in 2010 produce data indicating growth in the number of small children, then the City could add a residential component to a Child Care Impact Fee program.

APPENDIX TABLE B-1
SANTA MONICA DEMOGRAPHIC PROFILE
CHILD CARE LINKAGE PROGRAM
CITY OF SANTA MONICA

	1990		2000	
Population	86,905		84,084	
Housing Units	47,753		47,863	
Households	44,860		44,497	
Households w/Children Under Age 18				
Number of Households	7,171		7,488	
% of All Households	16.02%		16.80%	
Children Under 18 in Santa Monica by Age Range				
Under 5	4,048	34%	3,448	28%
5 - 9	3,101	26%	3,538	29%
10 - 14	2,878	24%	3,507	28%
15 -17	1,930	16%	1,821	15%
		100%		100%
Total Number Under 18	11,977		12,314	
Approximate Share of Households with Pre-School Children		4.90%		4.70%
Approximate Share of Households with School Age Children		10.40%		12.60%
Number of Children per Household with Children Under 18		1.70		1.64

Los Angeles County
Households with Children Under 18 as % of All Households 41.30%

APPENDIX TABLE B-5
ANNUAL RESIDENTIAL BUILDING ACTIVITY IN SANTA MONICA
COMMERCIAL BUILDING ACTIVITY IN SANTA MONICA
CITY OF SANTA MONICA

Assumptions:

YEAR	SINGLE-FAMILY UNITS	MULIT-FAMILY UNITS	TOTAL UNITS (SF + MF)
1990	71	237	308
1991	120	219	339
1992	31	187	218
1993	12	110	122
1994	10	29	39
1995	6	60	66
1996	23	172	195
1997	28	280	308
1998	46	762	808
1999	36	240	276
2000	55	405	460
2001	43	196	239

1990-2001

Total (rounded)	480	2,900	3,380
Annual Average (12 year period)	40	242	282

1995/2001

Total (rounded)	240	2,120	2,350
Annual Average (7 year period)	34	303	336

Sources: Construction Industry Research Board, KMA

APPENDIX C
OTHER WEST LOS ANGELES CHILD CARE CENTERS

Les Enfants, Inc. Pre-School
2702 Virginia Avenue, Santa Monica
(310) 315-0058

Developer

- Page Construction

Building Type

- New construction
- Stand alone center built in 1998

Size of Facility

- Total = 10,000 square feet
- Indoor space = 5,000 square feet
- Outdoor space = 5,000 square feet

Child Care Slots

- Infant = 28
- Toddler = 18
- Preschool (age 3 to kindergarten) = 26

Costs

- *Land:* N/A
- *Construction (building shell):* $120 per square foot
- *Tenant Improvements, Fixtures, Outdoor Play Area, etc.:* $16,000
- *Furnishings and Equipment*: $5,000
- *Start up Costs:* $1,700 for licensing, fire inspections, training, curriculum, and losses until facility is running at capacity

Parking Requirements

- 5,000 square feet dedicated to parking

Source

- Nancy Behravesh, Director, Les Enfants, Inc.

Westside Children's Center (WCC)
12120 Wagner Street, Culver City
(310) 397-4200

Developer

- WCC

Building type

- New construction
- Stand alone and expansion of existing facility 2002

Size of Facility

- Total = 26,650 square feet
- Indoor space = 11,650 square feet
- Outdoor space = 15,000 square feet

Child Care Slots

- Infant = 0
- Toddler (18 – 34 months) = 48
- Preschool (age 35 months to kindergarten) = 52

Costs

- *Land:* Land purchase at $1 million in 1995 when values were depressed. Industrial zoned land owned by the City of Los Angeles.
- *Construction (building shell):* Total development costs were $2.2 million or $190 per square foot.
- *Tenant improvements, fixtures, outdoor play area, etc.:* $344,000 or $30 per square foot.
- *Furnishings and equipment:* $87,000
- *Start up costs:* $107,000, including curriculum materials & equipment.

Parking Requirements

- A new structured parking area will be provided to serve the site. There are 10 drop-off spaces.

Other

- Child care facility is part of the new Child Development and Neighborhood Center. The new building enables WCC to more than double its on-site child care services to lower income families, including subsidized infant care program.

- The project also includes a large community meeting room and a professional kitchen.

Source

- Douglas Chin, WCC

New Path Montessori School
1962 20th Street, Santa Monica
(310) 450-2477

Building Type

- Rehabilitated - 2001
- Single-family home in residential area

Size of Facility

- Total = 2,400 square feet
- Indoor space = 1,200 square feet
- Outdoor space = 1,400 square feet

Child Care Slots

- Infant = 0
- Toddler = see below
- Preschool (age 2 to kindergarten) = 30

Costs

- *Land:* $328,000
- *Construction (building shell):* $125 per square foot
- *Tenant Improvements, Fixtures, Outdoor Play Area, etc.:* $35,000
- *Furnishings and Equipment*: NA
- *Start up costs:* $200 for licensing

Parking Requirements

- Three drop off spaces and staff parking spaces provided. 12' property in alley

Source

- Chandra Jayasekara (Ira), New Path

Saint Joseph Infant Toddler Development Center
718 Rose Avenue, Venice
(310) 396-6468

Developer

- Venice Community Housing Corporation, Owner

Building type

- Rehabilitated – 1999
- Two-story low-rise office building

Size of Facility

- Total = 2,470 square feet
- Indoor space = 1,570 square feet
- Outdoor space = 900 square feet

Child care slots

- Infant = 6
- Toddler = 17
- Preschool (age 3 to kindergarten) = 0

Costs

- *Land:* $114,900
- *Construction (building shell):* $161 per building square foot
- *Tenant Improvements, Fixtures, Outdoor Play Area, etc.:* above
- *Furnishings and Equipment*: $32,000
- *Start up Costs:* $10,600 for licensing, training, curriculum, family recruitment

Parking Requirements

- Two spaces

Other

- Mostly funded with public grants

Source

- Judy Alexander, Saint Joseph Center, (310) 396-6468
- Lori Zimmerman, Venice Community Housing Corporation, (310) 399-4100

UCLA Campus Child Care Center
UCLA Campus
(310) 206-1861

Developer

- UCLA Capital Programs

Building Type

- Planning – Expected 2003
- New stand alone center
- Renovation of existing structure (approx 1,000 square feet) for new administration area (lobby, kitchen and conference room).

Size of Facility

- Total = 12,000 square feet
- Indoor space = 5,000 square feet
- Outdoor space = 7,500 square feet

Child Care Slots

- Infant = 12
- Toddler = 12
- Preschool (age 3 to kindergarten) = 60

Costs

- *Land:* University donation
- *Construction (building shell):* Only provided "Total Cost All In" amount equal to $2.1 million or $420 per building square foot
- *Tenant Improvements, Fixtures, Outdoor Play Area, etc.:* Above
- *Furnishings and Equipment*: Above
- *Start up Costs:* Above

Parking Requirements

- Parking provided for staff on-campus but not attached to facility

Other

- Major private donation for construction

Source

- Gay Macdonald, (310) 206-1861

APPENDIX D- CHILD CARE PROGRAMMATIC EXPENDITURES OF THE CITY

A. Introduction

In this section, KMA summarizes the expenditures made by the City of Santa Monica for various child care programs and youth services and links them to residential units. They are linked to residential units, and not workplace buildings, because the services and programs are available to residents if not exclusively, certainly primarily.

As indicated in the Report introduction, a narrow, but widely accepted, interpretation of the Mitigation Fee Act, AB 1600 as written into California Government Code, Section 66000 (Code) is that linkage fee type programs may only address capital or facility costs. Since the expenditures examined in this section are all programmatic costs, they are not eligible for linkage fee purposes. As such, this material is summarized for added information only.

For purposes of this exploration, KMA utilized expenditure information for one year (Fiscal Year (FY) 2002/03 Budget). Should the City elect to proceed with any use of the information, it is recommended that additional data for more years be assembled. Average annual City expenditures should reflect data from at least three to five years would to provide a more solid foundation for any purported average.

Given the limitations for proceeding with programmatic expenditures, and the fact that a residential impact fee is not recommended at this time, the information and methodology presented in this section are intended as illustrative only.

B. City Expenditures on Preschool Child Care

The City of Santa Monica responds to community needs through direct service provision or contracts with community agencies through the City's Community Development (CD) Program. The CD Program awards funding to Connections for Children (CFC) and The Growing Place for child care scholarships to low and moderate-income Santa Monica families. CFC prioritizes their subsidies for the Santa Monica Child Care and Family Support Program to families of children from infants through preschool and The Growing Place is a child care center that serves families with children from three months through preschool.

Both these programs receive funding for their operations and scholarships. In FY 2002/03, CFC received $122,025 and The Growing Place $171,000 for operational costs. This excludes the amount of funding for their award of scholarships. In order to determine the costs of the program per residential unit in Santa Monica, it was necessary to apply the City expenditure on general program operations to all children of appropriate age in the City and ultimately all households and housing units. Another methodology, which would end with the same result, is to identify the

expenditure per household in the program and then establish the rate of participation among those eligible. This analysis is summarized in Appendix Table D-1 below. Appendix Table D-4, at the end of this section, presents the figures from the City Budget divided into the two components.

Appendix Table D-1
Programmatic Expenditures for Preschool Children, per Residential Unit

Total Cost of Programs	
Connection Program excluding Scholarship Program	$122,025 /Year
The Growing Place excluding Scholarship Program	$171,000 /Year
Total	$293,025 /Year
Total Number Eligible Children in Santa Monica	
Ages 0-4 plus 50% of Age 5	3,773
Cost per Eligible Child in Santa Monica	$77.66 /Year
Rate of Eligible Children per Household (Number of eligible children divided by all households in Santa Monica – 44,497)	8.48%
Cost per Residential Unit	
Cost per Residential Unit (8.48% x $77.66)*	$6.59 /Year
Cost Capitalized @ 10%	$66

*Alternatively, $293,025 costs divided by 44,497 households = $6.59

The conclusion is that the cost of the program per household or residential unit (the difference being a very small vacancy factor) in Santa Monica is $6.59 per year, or capitalized at 10% to address the long term.

C. City Expenditures on School Age Child Care

The City of Santa Monica's program for school age children is called the CREST program. The program serves 4th and 5th grade students, or for this study's purposes children age 9 and 10 years old. Outside of the scholarship component, the City contributed $851,968 per the FY 2002/03 Budget (see Appendix Table D-4).

A similar methodology for determining the cost per residential unit as was employed with the preschool programs is utilized.

Appendix Table D-2
Programmatic Expenditures for School-Age Children, per Residential Unit

Total Cost Program	
CREST Program excluding Scholarship Portion	$851,968 /year
Total Number Eligible Children in Santa Monica (4^{th} and 5^{th} graders or 9 and 10 year olds)	1,596
Cost per Eligible Child in Santa Monica	$534 /year
Rate of Eligible Children per Household (Number of Eligible Children Divided by All Households in Santa Monica – 44,497)	3.60%
Cost per Residential Unit	
Cost per Residential Unit (3.6% x $534)	$19.22 /year
Cost Capitalized @ 10%	$192

The conclusion is that the City spends $19.22 per residential unit per year on this program. The annual cost capitalized is $192.

D. City Scholarship Programs

As mentioned, the CD Program provides funding to the CFC and The Growing Place for programs that assist low and moderate-income households with cost of child care. In FY 2002/03, the annual amount available per child averages $5,900 for CFC and The Growing Place and $1,170 for the older children in the CREST Program.

For FY 2002/03, CFC awarded 79 children scholarships from 60 households. The Santa Monica Child Care and Support Program awarded approximately 70% of the scholarship families up to the 75% of the state median income and the remaining from families that exceeded the state median income. The Growing Place awarded scholarships to families attending Marine Park Child Development Center based on a variety of criteria including family income and need. They do not use a standardized formula or the state median income as criteria. The CREST program has developed its own fee schedule and will scholarship families above 80% of the state median income depending on family size. The scholarship averages were derived from total expenditures and total recipients. (See Appendix Table D-5, at the end of this section.)

The scholarship programs are available to resident families who meet their child care needs by placing their children in child care centers or family child center homes (not to pay for relatives care, nannies or babysitters). To ascertain the share of children needing child care who meet their needs in this manner, KMA relies on the percentages presented in the Report Section II addressing how families meet their child care needs.

To estimate how many qualifying households there would be per 100 residential units, one can look to the City's rate of affordable housing production as a share of total units. For the purposes at hand, one can therefore look to housing production for units affordable to up to 80% of median income households, which is consistent with the maximum income level of families who typically receive child care scholarships.

According to the recently adopted Housing Element, there were 1,167 units built in the City from 1988 through 1997 of which 395 units, or 34%, were affordable to low and very low income households (below 80% of median income) (*Housing Element Section V-2).* At the time of the Housing Element preparation, looking forward from January 1998, there were 467 out of 2,553 units proposed or in the "pipeline" that met the same income definitions, or 18%. Merging the two periods, the City averaged 23% of its annual housing production affordable units to this income range.

If the 23% average is applied to 100 residential units, we find the following:

Appendix Table D-3
Number of Children Eligible for Scholarships and Estimated Costs

Per 100 Residential Units	Age 0-5	Age 6-12	Total
Children Needing Child Care (Appendix C, Table B-2)	3.76	4.73	8.49
Children with Child Care Needs Met by Other Than Parent or Relatives	55%	36%	45%
Number	2.07	1.70	3.77
Children Qualifying for Scholarship Subsidy @ 23%	0.47	0.39	.0.86
Cost of Scholarship/Subsidy			
Per Child – Annual (see Appendix Table D-5)	$5,900	$1,170	
Cost per 100 Units	$2,770	$456	$3,226/year
Cost per Unit			$32.26/year
Cost Capitalized @ 10%			$323

In summary, when the cost of the scholarship program is allocated to each residential unit, the annual cost is $32 per year, which capitalized at 10% yields a capital cost of $323.

E. Other Expenditures for Child Care and Youth Services

City staff assisted with the preparation of materials on City expenditures for other child care related programs and youth services. Conceptually these expenditures are the same as child care programs in that they are available to the children and youth of resident families in Santa Monica. Staff therefore screened the budgets of City departments and extracted the programs for children and youth and the amount budgeted for FY 2002/03. This procedure led to an assembly of City department programs, which include the Human Services Division, Environmental and Public Works, Police, Library, Fire, Resource Management, SMMUSD, City Manger, Community and Culture, Community Programs and the Blue Bus.

Appendix Table D-6 at the end of this section contains the listing of programs and amounts in the proposed budget. The program list does not include the expenditures for the preschool or other programs presented thus far in this analysis. All programs on the list are additional programs; there is no double counting. The finding is that the City's proposed budget contained programs for children and youth totaling $11,751,914 or nearly $12 million.

At the time of the 2000 U.S. Census, the City of Santa Monica had 12,815 children under age 18 residing in it. The total expenditure divided by the number of children is nearly $1,000 for each child per year, or $917 per year to be more precise.

The total City expenditures divided by the number of households yields $264 per household, which capitalized at 10% is $2,640 per residential unit.

F. Summary of Costs Per Residential Unit

As previously described, there are limitations to residential linkage in Santa Monica due to the lack of growth in the number of young children in the City. In addition there is the requirement of a liberal interpretation of the Code to do a linkage program using operational or program type costs. Finally, figures here are drawn from a single budget year. For these reasons, KMA emphasizes that the analysis is illustrative only.

The following summarizes the total child care program and youth services expenditures amounts per residential unit. The result of adding together all the pieces is:

	Cost per Unit
City Preschool Programs	$66
City School Age Program (CREST)	$192
City Scholarship/Subsidy Program	$323
Other City Expenditures for Child Care and Youth Services	$2,640
Total Per Residential Unit	$3,221

In summary, the total child care programmatic costs, including youth services for children up through age 17, is $3,221 per residential unit in Santa Monica.

Table D-4

CITY PROGRAMS FOR PRE-SCHOOL AND SCHOOL AGE CHILDREN
CHILD CARE LINKAGE PROGRAM
CITY OF SANTA MONICA

Program & Budget Category	Annual Youth Budget [1]	Annual Subsidies/ Scholarships [2]	Balance/ Program Cost
I. Community and Cultural Services Department			
A. Human Services Division			
Community Development Program Grantees			
Connections for Children	$753,740	$590,136	$163,604
The Growing Place	$246,000	$65,986	$180,014
B. Direct Services Programs			
CREST -			
Child Care Component Only	$846,570	$0	$846,570
Scholarships	$605,501	$520,200 [3]	$0

1 City of Santa Monica, Proposed FY 2002-03 Youth Budget

2 City of Santa Monica, Subsidy Information FY 2001-02 provided by City staff. See Table B-5

3 Assumes difference is attributed to other non-youth scholarship programs itemized in budget.

APPENDIX TABLE D-5
CITY SCHOLARSHIP/SUBSIDY PROGRAM SUMMARY
CHILD CARE LINKAGE PROGRAM
CITY OF SANTA MONICA

Program	Annual Scholarship/Subsidy								Program Guidelines			
	Number of Recipients				Average Amount Per Child							
	Years				Years			Weighted				
	0-2	2-5	5+	Total	0-2	2-5	5+ Years	Average	Subsidy Calculation	Other Requirements Affordable	Residency Requirement	Comments
Connections For Children (CFC)	34	67	6	107	$3,600	$6,600	$4,200	$5,500	70 subsidies awarded by ranking order in accordance with CA Dept of Ed. Family Fee Schedule. 30 subsidies exceed Dept of Ed standards to meet households earning up to $45,000 for a household of four (nearly 90% of median income for Los Angeles County).	By sliding income scale, the CA Dept of Ed sets the fee to be paid by a family. Qualified households earn less than 75% of County Median, adjusted for household size. For instance, a household of three earning less than 50% of LA County Median will pay $40 per month for full-time daily care.	Yes	In addition to providing full day early childhood child care, program has component to provide training to foster children's early development. Provides operating subsidy support to one child care center; support and technical assistance to centers and family child care facilities.
The Growing Place (MPCDC)	3	13	0	16	$4,600	$4,000	$0	$4,100	Committee of the Board decides the awards based on "Tuition Assistance Application" provided by the parent. A priority system for enrollment is established for City of Santa Monica employees.	N/A	Priority Only	

Program	Subsidy						Program Guidelines			
	Number of Recipients by Grade			Average Amount Per Child						
	K-3rd "Primary Crest"	4th & 5th "Upper Crest"	Total	K-3rd	4th & 5th	Weighted Average	Subsidy Calculation	Other Requirements Affordable	Residency Requirement	Comments
CREST	51	255	306	N/A	N/A	$1,700	A Human Services Division's sliding scale fee is based on federal and state income guidelines, adjusted for Santa Monica high income area. Once income limits are met, all children in a household qualify. Participants must qualify annually.	Income sliding scale based on household size to receive scholarship ranging between 25% and 100% of fee. Incomes are less than the Los Angeles County median income.	Must be resident to qualify for a scholarship.	Program operates in 7 SM-MUSD elementary schools. By MOU the school district provides the classrooms/playgrounds and the City provides child care & other youth programs. The program is not fully subscribed. Monthly fees for the "before & after school program" range between $223-$285.

Santa Monica College "On the Move Program" excluded because service provided primarily to parents associated with the school.
For FY 2001/02, theCity provided nearly $45,000 to 7 children, an average subsidy of $6,430 per child.

Table D-6

CITY EXPENDITURES FOR CHILD CARE AND OTHER YOUTH SERVICES*
CITY OF SANTA MONICA
PROPOSED FY 2002-03 YOUTH BUDGET
(non school based programs and funding levels are in italic)

	DRAFT
Santa Monica-Malibu Unified School District	
Annual Operating Grant	$3,000,000
Grad Nite Subsidy	8,100
City Manager	
KidScape/Family Guide Publication	*22,000*
Community and Cultural Services Department	
Capital Improvements Program	
Skate Park	*572,000*
Cultural Arts Division	
Non-School funding and programs	*55,590*
School Linked Funding and Programs	177,500
Community Programs Division	
Youth Classes and Programs	*69,574*
Miles Playhouse	*167,756*
School Playground Community Use Access Program	168,912
Therapeutic Programs	*25,888*
Event Facilities	
Fee Waivers for Parking and Rental to School District	29,200
Human Services Division	
Community Development Program Grantees	
Boys and Girls Club of Santa Monica (Skate Park)	*25,420*
Computer Access Center	11,583
Dispute Resolution Services: (Youth and Family Program)	48,175
El Nido Family Center (Edison/Will Rogers Elementary)	110,085
Family Service of Santa Monica (McKinley, Muir Elementary/SAPID)	137,760
Family Service of Santa Monica: Agency Based Services	*57,605*
Growing Place: Mentor Program	10,250
Jewish Family Service of Santa Monica (Santa Monica High School)	26,138
Ocean Park Community Center: Sojourn Services	*47,300*
Santa Monica-Malibu Unified School District: Enlace Familiar	62,360

Santa Monica-Malibu Unified School District: Santa Monica High School Alliance	308,013
Saint John's Child and Family Center (John Adams/Lincoln/Olympic)	175,705
St. Joseph Center: Family Self Sufficiency	*161,875*
WISE: Senior Services: RSVP/America Reads	*30,750*
Woodcraft Rangers: Pico Neighborhood Youth and Family Center	*318,000*
Direct Service Programs	
Aquatics	*859,822*
Middle School Sports Leagues	126,807
CREST (Childcare, Recreation, Enrichment, Sports Together)	
Recreation (Playground Access)	73,281
Enrichment	131,412
Sports	262,796
Police Activities League	*444,625*
Virginia Avenue Park: Youth and Families Programs	*421,435*
Environmental Public Works Management	
School Related Programs	68,500
Non-School Related Programs	*38,500*
Fire Department: Fire Safety Programs	31,500
Library Services	
School Based	355,000
Youth and Families Services	*1,514,730*
Police Department	
School-Based Services	457,053
Youth and Family Services	*1,106,414*
Resource Management Department	12,000
Big Blue Bus	20,500
TOTAL	**$11,751,914**

*Excludes: Connections Program
CREST Child Care
City Employee Child Care Subsidies
Growing Place: Marine Park Child Development Center
All Scholarship/Subsidy Programs

BOARD of SUPERVISORS

City Hall
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102-4689
Tel. No. (415) 554-5184
Fax No. (415) 554-5163
TDD/TTY No. (415) 554-5227

MEMORANDUM

Date: December 19, 2025

To: Planning Department/Planning Commission

From: John Carroll, Assistant Clerk, Land Use and Transportation Committee

Subject: Board of Supervisors Legislation Referral - File No. 251211
Public Works, Administrative, Planning Codes - Street Trees

☒ California Environmental Quality Act (CEQA) Determination
(California Public Resources Code, Sections 21000 et seq.)
☒ Ordinance / Resolution
☐ Ballot Measure

Not defined as a project under CEQA Guidelines Sections 15378 and 15060(c)(2) because it would not result in a direct or indirect physical change in the environment.

12/22/2025 Don Lewis

☐ Amendment to the Planning Code, including the following Findings:
(Planning Code, Section 302(b): 90 days for Planning Commission review)
☐ General Plan ☐ Planning Code, Section 101.1 ☐ Planning Code, Section 302

☐ Amendment to the Administrative Code, involving Land Use/Planning
(Board Rule 3.23: 30 days for possible Planning Department review)

☐ General Plan Referral for Non-Planning Code Amendments
(Charter, Section 4.105, and Administrative Code, Section 2A.53)
(Required for legislation concerning the acquisition, vacation, sale, or change in use of City property; subdivision of land; construction, improvement, extension, widening, narrowing, removal, or relocation of public ways, transportation routes, ground, open space, buildings, or structures; plans for public housing and publicly-assisted private housing; redevelopment plans; development agreements; the annual capital expenditure plan and six-year capital improvement program; and any capital improvement project or long-term financing proposal such as general obligation or revenue bonds.)

☐ Historic Preservation Commission
☐ Landmark *(Planning Code, Section 1004.3)*
☐ Cultural Districts *(Charter, Section 4.135 & Board Rule 3.23)*
☐ Mills Act Contract *(Government Code, Section 50280)*
☐ Designation for Significant/Contributory Buildings *(Planning Code, Article 11)*

Please send the Planning Department/Commission recommendation/determination to John Carroll at john.carroll@sfgov.org.

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Tel. No. (415) 554-5184
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TDD/TTY No. (415) 554-5227

MEMORANDUM

Date: July 8, 2026

To: Planning Department/Planning Commission

From: John Carroll, Assistant Clerk, Land Use and Transportation Committee

Subject: Board of Supervisors Legislation Referral - File No. 251211 SUBSTITUTE VER 2 Public Works, Administrative, Planning, Business and Tax Regulations Codes - Street Tree Standards, Appeals, and Adopt-A-Tree Fund

☒ California Environmental Quality Act (CEQA) Determination
(California Public Resources Code, Sections 21000 et seq.)
- ☒ Ordinance / Resolution
- ☐ Ballot Measure

☒ Amendment to the Planning Code, including the following Findings:
(Planning Code, Section 302(b): 90 days for Planning Commission review)
☒ General Plan ☒ Planning Code, Section 101.1 ☒ Planning Code, Section 302

☐ Amendment to the Administrative Code, involving Land Use/Planning
(Board Rule 3.23: 30 days for possible Planning Department review)

☐ General Plan Referral for Non-Planning Code Amendments
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☐ Historic Preservation Commission
- ☐ Landmark *(Planning Code, Section 1004.3)*
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- ☐ Mills Act Contract *(Government Code, Section 50280)*
- ☐ Designation for Significant/Contributory Buildings *(Planning Code, Article 11)*

Please send the Planning Department/Commission recommendation/determination to John Carroll at john.carroll@sfgov.org.

From:	San Francisco Tree Campaign
To:	Board of Supervisors (BOS)
Cc:	Carroll, John (BOS)
Subject:	Opposition to Ordinance 251211 – Harmful Impacts on Urban Forest, Equity, and Public Input
Date:	Saturday, May 30, 2026 3:09:56 PM
Attachments:	Castro Community Tree Survey April 2026.doc Nob Hill_Chinatown Tree Survey May 2026.doc Noe Valley Tree Survey May 2026.doc Mission Community Tree Survey May 2026.doc

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Supervisors,

I am writing to strongly oppose Ordinance 251211, which undermines San Francisco's urban forest, weakens environmental protections, and removes critical public oversight. This legislation prioritizes developer convenience over the long-term health of our city's trees—our most effective tool against climate change, air pollution, and urban heat. Below, I outline why this ordinance is deeply flawed and must be rejected.

1. In-Lieu Fees Replace Trees with Paper Promises

The ordinance allows developers and property owners to pay fees instead of planting trees, effectively outsourcing the city's tree canopy goals to private entities with no accountability. This is a false solution for several reasons:

- No guarantee of real trees: Fees may fund unrelated programs or administrative costs rather than actual tree planting. The Adopt-A-Tree Fund, already underfunded, will now be diluted by unregulated contributions.
- Equity gaps: Low-income communities and renters—who benefit most from urban greening—will bear the brunt of heat islands and poor air quality while wealthy developers avoid obligations.
- Short-term thinking: Trees take decades to mature and provide full climate benefits. Fees do not replace the ecological, economic, and health benefits of actual street trees.

San Francisco's Urban Forest Master Plan (2020) sets ambitious goals to expand our tree canopy to 30% by 2035. This ordinance sabotages those goals by creating a loophole for developers to avoid their responsibility.

2. ADU Exemptions Undermine Canopy Expansion

Exempting Accessory Dwelling Units (ADUs) from tree-planting requirements is regressive and short-sighted:

- ADUs are a key tool for housing affordability, but they should not come at the expense of our urban forest.
- Small lots with ADUs often have limited space for trees, yet they contribute to heat islands and stormwater runoff. Exempting them reduces the city's ability to meet climate resilience targets.
- The ordinance fails to address the root cause: San Francisco's tree-planting backlog (over 10,000 missing trees in high-need areas). Instead of expanding exemptions, we should increase enforcement of existing requirements.

3. Eliminating Appeals for Tree Removals is Dangerous

The ordinance strips the public's right to appeal the removal of "hazardous" trees or city-initiated removals, handling unchecked power to city agencies:

- Lack of transparency: Without appeals, residents have no recourse if a tree is removed for non-emergency reasons (e.g., construction convenience, bureaucratic errors).
- Hazardous tree definitions are subjective: The city's own Tree Preservation Ordinance (TPO) already allows for appeals —removing this safeguard risks arbitrary removals.
- Public trust erodes: San Franciscans rely on the Board of Appeals to ensure fair decisions. Eliminating this

process undermines democracy and could lead to more removals than necessary.

4. Fees Won't Fund Real Solutions

While the ordinance creates a new account for in-lieu fees, there is no mechanism ensuring these funds actually go toward tree planting:

- The Adopt-A-Tree Fund is already underfunded and lacks transparency. Fees could be diverted to other city priorities, leaving our urban forest starved.
- No independent oversight: There is no guarantee the funds will be used for equitable planting in underserved neighborhoods (e.g., Bayview, Excelsior, Visitacion Valley).
- Better alternatives exist: The city should increase penalties for non-compliance, prioritize public tree planting, and expand community-led urban forestry programs (like the San Francisco Urban Forestry Division's existing efforts).

5. Climate and Health Consequences

San Francisco's urban forest provides $100+ million in annual benefits, including:

- Cooling cities (reducing urban heat island effect by up to 10°F in some areas).
- Improving air quality (removing 2,000+ tons of CO_2 yearly).
- Reducing stormwater runoff (lowering flood risks).
- Boosting mental health (trees reduce stress and improve well-being).

This ordinance weakens these critical services by:

- Reducing the number of new trees planted.
- Allowing removals without public input.
- Failing to address the tree equity gap (wealthier neighborhoods have 3x more trees than low-income areas

What Should Be Done Instead?

To truly protect San Francisco's urban forest, the Board should:

1. Reject Ordinance 251211 and instead strengthen tree-planting mandates.
2. Require developers to plant trees on-site (no in-lieu fee loopholes).
3. Restore public appeal rights for tree removals.
4. Increase funding for equitable tree planting in underserved communities.
5. Enforce existing laws (e.g., penalties for non-compliance with tree-planting requirements).
6. Expand community-led urban forestry programs (e.g., Bureau of Urban Forestry and nonprofits partnerships).

Call to Action

San Francisco's urban forest is a public good—not a commodity to be traded or exploited. This ordinance prioritizes short-term developer profits over long-term environmental and health benefits. I urge you to reject 251211 and instead commit to a stronger, more equitable urban forest policy.

San Francisco Tree Campaign
https://sanfranciscotreecampaign.blogspot.com

Castro Community Tree Survey April 2026

(1) 266-270 Dolores empty plot
(1) 3648-17th Street no tree
(1) 3650-17th Street empty plot
(1) 3670 17th Street empty plot
(1) 3676-3680 17th Street empty plot
(1) 3663-3665 17th Street empty plot
(1) 416 Dolores empty plot
(1) 3750-18th Street 1 stump
(3) 504 Dolores empty plot and two missing trees in bed
(1) 530 Dolores missing tree in bed
(1) 570 Dolores stump
(2) 680 Dolores two missing trees in be
(2) 650 Dolores empty spaces
(1) 742 Dolores portable potty over empty plot
(2) 3552-21st Street two empty plots
(1) 851-853 Church empty plot
(1) 223-237- Liberty empty plot
(1) 246 Liberty empty plot
(1) 270 Liberty empty plot
(3) 240 Cumberland three plots with stumps
(1) 56-58 Hancock empty plot
(64-68 Hancock 3 foot stem in plot
(2) 503-509 Sanchez two bushes in plots
(1) 576 Church empty plot
(1) 544 Church empty plot
(2) 549 Church one with stump and empty plot
(1) 483 Church empty plot
(3) 3371-16th Street two empty plots on Church side of the property
(3) 3398-16th Street three planters' boxes on Church side of the property without trees
(1) 2415 Church empty plot
(1) 2000 Market on Church side of the property empty plot
(1) 269 Church empty plot
(1) 298 Church empty plot
(4) 2175 Market two empty plots on Market and two missing trees on 15th Street side of property
(1) 2047-15th Street empty plot on Sharon side of the property
(2) 52 Sharon two empty beds without trees
(1) 264-274 Sanchez empty plot
(5) 2295 Market Street on 16th Street side of the property five empty plots
(1) 327 Noe empty plot
(1) 367 Noe stump in plot
(1) 3887 -17th Street no tree in plot
(1) 415 Noe empty plot

(1) 47-49 Ford empty plot
(4) 295 Dolores three empty plots and one with stump on the Sanchez side of the property
(1) 3897-18th Street empty plot on Sanchez Street side of the property
(1) 461 Noe pot over plot no tree
(1) 3900-17th Street 90% of Canopy cut back
(3) 4040-4044-18th Street with stump two plots on Hartford side of the property
(1) 4035-18th Street stump n plot
(1) 136 Hartford bed empty plot
(1) 156 Harford bed without tree
(1) 143 Hartford no tree in plot
(1) 201 Hartford on 19th Street side of the property empty plot
(1) 4160-20th Street flowers no tree in plot
(1) 725 Castro empty plot
(1) 3900-21st Street empty plot
(1) 3878-3880- 21st Street empty plot
(1) 742 Castro no tree in plot
(2) 607 Castro on empty pot in plot
(1) 4068-19th Street empty plot
(1) 211 Collingwood empty plot
(4) 4235-19th Street one with stump, one with plants and two empty plots on Diamond side of the property
(1) 161 Collingwood empty plot
(1) 143 Collingwood plant not tree in plot
(2) 62-69 Collingwood two trees with 90% canopy cut back
(1) 2755 Market empty plot
(1) 459-18th Street Dead tree
(1) 191 Caselli empty plot
(1) 187 Castelli empty plot
(1) 127 Castelli no tree in plot
(2) 250 Douglas two empty plots
(1) 4615-19th Street pot over plot no tree
(3) 388 Douglas empty plot two empty plots on Seward side of the property
(1) 300 Eureka empty plot on 20th Street side of the property
(1) 302 Eureka empty plot
(1) 4433-20th Street empty plot
(1) 3970-17th Street empty plot
(2) 2301 Market two empty plots on Noe side of the property
(1) 2207 Market empty plot on Sanchez side of the property
(1) 2101 Market medium stump of Palm tree
(1) 2257 Market empty plot

Nob Hill/Chinatown Tree Survey May 2026

(2) 1100 Van Ness empty on Geary side of the property one with stump
(4) 1133 Polk empty plot and three empty plots on Geary side of the property
(1) 1030 Post empty plot
(1) 1005 Larkin empty plot on Geary side of the property
(1) 965 Geary empty plot
(2) 648 Hyde empty plots
(1) 901 Post empty plot on Hyde side of the property
(1) 875 Post empty plot
(1) 775 Post on Leavenworth side of the property empty plot
(1) 600-610 Leavenworth with stump
(2) 735 Geary two dead trees
(2) 765 Geary two dead trees
(1) 687 Geary bush not tree in plot
(1) 676 Geary dead tree
(1) 667-669 Geary empty plot
(1) 639 Geary empty plot
(1) 620 Jones empty plot
(1) 491 Post empty plot
(2) 535 Powell empty plots
(1) 510 Stockton empty plot
(1) 698 Bush empty plot on Powell Street side of the property
(1) 955 Bush empty plot
(1) 955 Bush empty plot
(1) 940 Jones empty plot
(1) 1199 Bush plot with 1 foot stem and 3 poles
(3) 1230-1234 Pine three empty pots for trees
(1) 1249 Polk empty pot for tree
* 0-100 Fern Alley multiple places for trees in pots and beds
(1) 150 Polk empty plot
(1) 1236 Sutter empty plot with 3 poles
(1) 1500 Van Ness with stump
(1) 1608 Van Ness with stump on California side of the property
(1) 1420 Polk empty plot
(1) 900 Hyde on Pine side of the property empty plot
(1) 1235 Pine empty plot
(1) 940 Leavenworth with stump
(1) 930 Leavenworth no tree in plot
(1) 1190 Pine on Leavenworth side of the property with stump
(2) 1201 California 1 with 3 poles empty and empty plot on the Jones side of the property
(1) 1111 California empty plot
(2) 875 California two empty plots on Powell side of the property
(1) 851 California empty plot
(2) 655 Sutter two on California side of the property with stumps

(1) 821 Stockton empty plot
(1) 723 Pine empty plot
(1) 735 Pine empty plot
(1) 1231 Sacramento empty plot
(1) 1260 Sacramento empty plot
(2) 1298 Sacramento with stumps
(1) 1333 Jones empty plot on Clay side of the property
(1) 1335 Clay empty plot
(1) 1365 Clay empty plot
(1) 1630 Clay empty plot
(1) 1630 Polk empty plot
(1) 1538 Polk empty plot
(1) 1553 Polk dead tree in pot
(2) 1755 Clay two empty plots
(2) 1788 Clay 1 empty plot and empty plot on Van Ness side of the property
(1) 1946 Van Ness empty plot
(1) 1725 Washington empty plot
(1) 1760 Polk empty plot on Washington side of the property
(1) 1459-1465 Hyde dead tree
(1) 1402 Hyde empty plot
(2) 1365 Taylor one with stump and empty plot
(1) 1355 Taylor with stump
(1) 1360-1380 Taylor empty plot
(1) 1033 Washington empty plot
(2) 1365 Taylor one with stump and one empty plot
(1) 1355 Taylor with stump
(5) 777 Sacramento five empty plot on property
(1) 447 Stockton empty plot

Noe Valley Tree Survey May 2026

(1) 3334-21st Street empty pot
(2) 3352-3354 21st Street bushes in plot no trees
(2) 906 Guerrero one with stump and one empty plot
(1) 920 Guerrero empty plot
(1) 3471-21st Street empty plot
(1) 811-813 Dolores empty plot
(1) 861 Dolores empty plot
(1) 3531-22nd Street empty plot on Dolores side of the property
(2) 1079 Church two loop off and with stump
(2) 1004 Sanchez two empty beds without trees
(3) 998 Sanchez three beds without trees
(1) 4037-4039-23rd Street empty plot
(1) 1021-1023 Noe bush no tree in plot
(1) 561 Elizabeth bush in plot no tree
(1) 1134 Castro empty plot
(2) 1328 Castro two empty plots with plants in plots
(1) 741 Diamond empty plot
(1) 4179-24th Street empty plot
(1) 4168-21st Street empty plot
(1) 4160-21st Street empty plot
(1) 4120-24TH Street empty plot
(1) 4107-21st Street empty plot
(1) 1316 Castro empty plot
(1) 1354 Castro empty plot
(1) 407 Jersey with stump
(2) 410 Jersey two plots with stumps
(2) 1333 Castro two empty plots
(1) 1337 Castro empty plot
(2) 4300-24th Street planter boxes no trees
(2) 3393-24th Street 2 planters boxes no trees on Noe side of the property
(1) 3539-24th Street empty plot
(1) 3770-24th Street empty plot
(1) 1070 Dolores across the street empty plot
(1) 1040 Dolores empty plot
* 1000-1100 Dolores medium missing multi trees
(2) 1217 Dolores empty plots
(1) 1225 Dolores empty plot
(1) 1219 Dolores empty plot
(1) 1274 Dolores empty bed with flowers no tree
(1) 1332 Dolores empty bed with flowers no tree
(1) 1302 Church with stump on 25th Street side of the property
(1) 3892 Ceser Chavez on Church side of the property empty plot
(1) 441 Vicksburg box without a tree

(1) 406 Vicksburg empty plot
(1) 320 Vicksburg empty plot on Jersey side of the property
(1) 1240-1242 Sanchez empty plot
(1) 136 Clipper plot no tree
(1) 172 Clipper flowers in bed no tree
(1) 213 Clipper flower bed no tree
(1) 246 Clipper with stump
(1) 228 Clipper flowers in plot no tree
(1) 227 Clipper empty plot
(1) 4035-26th Street empty plot
(1) 4023-26th Street empty plot
(2) 1302 Noe two empty planters' beds
(1) 4157-24th Street empty plot
(2) 4163-24th Street two planting beds missing trees
(1) 4174-24th Street empty plot
(1) 4191-24th Street tree missing 90%of canopy
(1) 1618 Castro empty plot
(1) 432 Clipper flowers in bed no tree
(1) 449 Clipper no tree in plot
(1) 4172-25th Street bush no tree
(1) 349 Jersey empty plot
(1) 335-337 Jersey empty plot
(2) 1189 Noe flowers in plots no tree
(1) 1191-1193 Noe bed with flowers no tree
(1) 1229 Noe empty plot
(2) 1345 Noe one on one and one on Cesar Chaves side of the property
(2) 1409 Noe bush in plot no tree
(1) 1519 Noe empty plot
(1) 1548 Noe empty plot on Valley side of the property
(1) 412 Valley empty plot
(1) 426 Valley empty plot
(1) 427 Valley plot with flowers no tree
(1) 1550 Noe empty plot
(1) 1558-1564 Noe empty plot
(1) 1561-1563 Noe empty plot
(1) 1690 Church empty bed on Sanchez side of the property
(2) 1560 Sanchez one with stump and one empty plot
(1) 1514 Sanchez empty plot
(1) 1531-1533 Sanchez bed without tree
(1) 1476 Sanchez empty plot
(1) 1474 Sanches empty plot
(2) 1442 Sanchez 2 plots with flowers no trees
(1) 400-27th Street multi sites without trees
(1) 3977 Cesar Chavez empty plot
(1) 1355 Sanchez empty plot
(1) 3902 Cesar Chavez empty plot

(1) 1332 Dolores no tree
(2) 3795 Cesar Chavez two empty plots on Dolores side of the property
(1) 206-27th Street empty plot
(1) 1472 Dolores flowers in plot no tree
(1) 152-24th Street pots in plot no tree
(1) 177-24th Street no tree
(1) 1516-1518 Dolores flowers no tree in plot
(1) 1541 Dolores empty plot
(1) 1592 Dolores empty plot
(1) 220-29th Street empty plot
(1) 111 Day flower in plot no tree
(1) 172 Day empty plot
(1) 180 Day with stump
(4) 295 Day two empty plots on Sanchez and two empty plots on 30th Street side of the property
(1) 1811 Church empty plot
(1) 274-30th Street flowers in plot no tree

Mission Community Tree Survey May 2026

(2) 198 Valencia one dead tree and empty plot on Duboce side of the property
(1) 95-97 Duboce empty pot
(1) 15 Woodward empty plot
(1) 1700 Mission empty plot
(1) 1716 Mission empty plot
(1) 1735 Mission empty plot
(1) 203-207 South Van Ness empty plot
(2) 1745 Folsom two empty plots on Treat Street side of the property
3+ 2-100 Florida empty plots
(3) 400-499 Division two empty plots and one with stump
(1) 1340 Bryant empty plot
(3) 2419 Alameda three empty plots
(2) 2460 Alameda tow empty plots
(4) 55 Potrero empty plot and three empty plots on Alameda side of the property
(1) 2211 Alameda with stump
(1) 600-15th Street empty beds
(1) 325 San Bruno empty plot
(2) 222 Utah two empty plots on 17th Street side of the property
(2) 376 Utah two empty plots
(1) 301 Potrero empty plot
(4) 338 Potrero four empty planter beds
(1) 2415-17th Street 1 dead tree
(3) 2450-17th Street three empty plots on Hampshire side of the property
(1) 2425-17th Street one empty plot on Hampshire side of the property
(1) 1720 Bryant empty plot
(2) 321 Florida 1 possible dead tree and empty plot
(2) 2800-17th Street empty plot and empty plot on the Alabama side of the property
(1) 2701-17th Street empty plot
(1) 941 Harrison with stump
(2) 1200-15th Street two empty plots on Harrison side of the property
(1) 1300-1399-15th Street empty plot
(1) 1855 Folsom with stump
(1) 87-14th Street empty plot no tree
(1) 1779 Folsom empty plot on 14th Street side of the property
(1) 120-14th Street empty plot
(4) 1800 Folsom two empty plots on 14th Street side of the property
Two empty plots on Shotwell side of property
(1) 50 Shotwell empty plot
(2) 1417-15th Street one with stump and one empty plot
(1) 131 Shotwell across the street with empty plot
(1) 170 Shotwell empty plot
(1) 2121 Folsom empty plot
(1) 3153-17th Street empty plot

(1) 3100-17th Street empty plot on Shotwell side of the property
(1) 3154-17th Street empty plot on Shotwell side of the property
(1) 3202-17th Street empty plot
(1) 475 South Van Ness empty plot
(2) 427 South Van Ness two empty plots
(1) 387 South Van Ness loped off 5 feet stem
(1) 351 South Van Ness empty plot
(1) 310 South Van Ness empty plot
(2) 270-14th Street two empty plots
(1) 1825 Mission empty plot
(15) 235 Valencia one empty plot and fourteen empty plots on Stevenson side of the property
(1) 333 Valencia empty plot
(2) 1661-15th Street two empty plots
(1) 230 Julia empty plot
(1) 3027-16th Street empty plot
(2) 120 Capp two empty plots
(1) 3250-17th Street empty plot
(2) 3338-17th Street two empty plots
(1) 3090 16th Street empty plot
(1) 256 Valencia empty plot
(1) 3100 16th Street empty plot on Valencia side of the property
(1) 508 Valencia empty plot
(1) 686 Valencia empty plot
(1) 798 Valencia empty plot
(1) 26 Lexington empty plot
(2) 2138 Mission bed missing trees
(1) 3420-18th Street empty plot on San Carlos side of the property
(1) 3435-18th Street empty plot
(1) 112 San Carlos 7 foot high stump
(1) 3450-19th Street empty plot
+ 3452-19th Street no trees in bed
(1) 221 San Carlos empty plot
(1) 3425-19th Street with stump
(1) 95 Capp empty plot
(1) 371A Capp with stump
(3) 362 Capp three empty plots
(1) 342 Capp empty plot
(1) 331-333 Capp dead tree
(1) 218 Capp with stump
(2) 754 South Van Ness two empty plots
(1) 793 South Van Ness empty plot
(1) 492 Shotwell empty plot
(1) 430 Shotwell with stump across the street
(2) 2550-18th Street one empty plot on Shotwell and one on 18th Street
(2) 364 Shotwell two beds with no trees

(7) 2270 Folsom three on Folsom and four on 358-362 Shotwell side of the property
(2) 308 Shotwell plot with flowers no tree
(1) 2168 Folsom 3 foot stump
(1) 2225 Folsom with stump
(3) 2180 Harrison 2 empty plots and 1 with stump
(2) 601 Alabama one empty plot and empty plot on 18th Street side of the property
(1) 498 Alabama empty plot on Mariposa side of the property
(2) 450 Alabama two empty plots
(1) 495 Alabama empty plot
(2) 408 Alabama two empty plots
(2) 1890 Bryant two empty plots across the street
(3) 650 Florida three empty plots
(1) 709 York flower bed no tree
(1) 623 York empty plot
(1) 621 York empty plot
(1) 2699-18th Street empty plot
(1) 614 York empty plot
(1) 1999 Bryant empty plot
(1) 501 York empty plot
(2) 2495 Mariposa empty plot and one with stump
(8) 626 Potrero six empty plots on 18th Street side of the property and two empty plots on Hampshire side of the property
(1) 2536-18th Street empty plot
(3) 718 Potrero three empty plots
(1) 806 Potrero empty plot
(2) 874-876 Potrero empty bed without trees
(1) 2640-21st Street empty plot
(2) 854-858 Hampshire no trees flowers in plots
(1) 2651-21st Street empty plot on Hampshire side of the property
(1) 889 York empty plot
(1) 833 York with stump
(1) 723 York plot with bush no tree
(1) 709 York bushes in plot no tree
(1) 2132 Bryant plot with bushes no tree
(1) 2219-2229 Bryant dead tree
(8) 2751-21st Street three on Bryant and five on 21st Street side of the property
(1) 865 Florida empty plot
(1) 859-861 Florida empty plot
(2) 824 Florida two empty plots
(3) 782 Florida three empty plots
(3) 3030-21st Street three plots next to building empty
(1) 3707-20th Street empty plot
(1) 828 Alabama with stump
(1) 871-873 Alabama flowers no tree in plot
(1) 2900-21st Street empty plot on Harrison side of the property
(1) 2581 Harrison across the street empty plot

(1) 2498 Harrison empty plot
(1) 719 Treat empty bed with flowers
(1) 787 Treat dead tree
(1) 2985-21st Street empty plot on Folsom side of the property
(1) 2502 Folsom empty plot
(1) 2430 Folsom empty plot
(1) 2385-2389 Folsom with stump
(1) 2399 Folsom empty plot
(1) 587 Shotwell empty plot
(1) 490 Capp empty plot
(1) 500 Capp empty plot
(1) 569 Capp dead tree
(1) 577 Capp empty plot
(1) 601 Capp empty plot on 21st Street side of the property
(1) 3101-21st Street with stump
(1) 2501 Mission empty plot on 21st Street side of the property
(1) 376 San Carlos across street plot with flowers no tree
(1) 304 San Carlos empty plot
(1) 3525-20th Street empty plot
(1) 3505- 20th Street empty plot
(2) 274 San Carlos empty plots
(1) 325 Lexington empty plot
(1) 382 Lexington empty plot
(1) 3250-21st Street empty plot
(1) 3240-21st Street flowers in plot no tree
(1) 19-21 Barlett empty plot
(1) 1005-1007 Valencia empty plot
(1) 507 Barlett empty plot
(1) 2999 Mission with stump
(1) 1101 Capp on 26th Street side of the property
(1) 3330 Cesar Chavez empty plot
(1) 1499 South Van Ness empty plot
(1) 1489 South Van Ness empty plot
(1) 1486 South Van Ness empty plot
(1) 1515 South Van Ness on 26th Street side of the property empty plot
(1) 3215 Cesar Chaves empty plot
(3+) 3000-3100 Folsom three empty plot and one with stump
(1) 2961 Folsom with stump
(1) 2951 Folsom empty plot
(1) 2943 Folsom empty plot
(1) 2919 Folsom empty plot
(1) 2924 Folsom empty plot
(1) 3160-26th Street empty plot
(2) 3169-26th Street two with stumps
(1) 3147 Cesar Chavez empty plot
(2) 3100 Cesar Chavez one empty plot and with stump

(2) 3039 Harrison empty plots
(2) 1370 Alabama 6 foot stump
(1) 1450 Alabama flower no tree in plot
(1) 1454 Alabama empty plot
(1) 3050 Cesar Chavez with stump
(1) 1457 Florida flower no tree in plot
(1) 1411 Florida empty plot
+ 2800-2900 Bryant Medium missing multi trees
(1) 2834 Bryant with stump
(1) 2881-2868 Bryant big plot with stump
(1) 2978 Cesar Chavez empty plot
(1) 2885 Bryant empty plot
(1) 2873 Bryant empty plot
(1) 1405 York empty plot on 26th Street side of the property
(1) 1384 York empty plot
(1) 1349 York empty plot
(1) 1333 York empty plot
(2) 1301 York two empty plots
(1) 1420 Hampshire empty plot
(4) 1227 Hampshire four empty plots
(1) 2869-25th Street empty plot
(2) 1266 Florida two empty plots
(1) 3059-25th Street empty plot
+ 3100-26th Street
Street trees missing on 26th Street
Street trees missing on Treat Street
Street trees missing on 25th Street
Street trees missing on Harrison
+ Inside the park is missing trees and stumps
(1) 3166-25th Street empty plot
(1) 1179 Treat empty plot
(1) 1171 Treat empty plot
(1) 1142 Treat empty plot
(1) 2817 Folsom empty plot
(1) 2924 Folsom empty plot
(1) 3196-24th Street empty plot
(1) 3351-23rd Street on Bartlett side of the property empty plot
(1) 2600 Mission empty plot
(1) 2581 Mission empty plot
(1) 2568 Mission empty plot
(1) 2511 Mission empty plot
(1) 2084 Mission empty plot
(1) 2038 Mission empty plot
(1) 1863 Mission empty plot

From: San Francisco Tree Campaign
To: Board of Supervisors (BOS)
Cc: Carroll, John (BOS)
Subject: Public Comment on File No. 251211
Date: Wednesday, April 22, 2026 3:54:42 PM
Attachments: Duboce Triangle and Lower Haight April 2026.docx

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Public Comment - OBJECTION

File 251211: Street Tree Planting Requirements Ordinance

To the Board of Supervisors:

I object to and oppose File 251211.

Primary Concerns

1. Urban Canopy Loss

- In-lieu fees cannot replace mature trees already lost
- San Francisco's canopy coverage is insufficient; this ordinance reduces planting requirements
- Financial payments do not equal environmental benefits

2. Equity Issues

- Wealthy developments can pay to avoid planting obligations
- Low-income neighborhoods receive fewer street trees
- Creates two-tier system based on developer ability to pay

3. Removal of Public Oversight

- Eliminating Board of Appeals authority over city tree removals reduces transparency
- Citizens lose right to challenge questionable removals
- Lacks accountability mechanism

4. ADU Exemption Problematic

- ADUs are supposed to increase housing sustainability
- Exempting them from tree requirements contradicts climate goals
- Cumulative impact of many small exemptions

5. In-Lieu Fee Adequacy

- No evidence fee amount equals actual tree replacement costs
- No guarantee funds will be spent within affected neighborhoods
- History shows fees often insufficient for stated purposes

Request

I urge the Board to:

- Reject this ordinance
- Require actual street tree planting, not fees
- Restore appeals process
- Remove ADU exemptions

San Francisco Tree Campaign

Duboce Triangle and Lower Haight April 2026

(1) 55 Laguna on Herman side of the property empty plot
(1) 119 Buchanan plot with stump
(1) 236 Herman empty plot
(2) 20 Church two empty plots
(1) 124-126 Church empty plot
(1) 2020 Market on Church side of the property empty plot
(1) 178 Church empty plot
(1) 751-14th Street empty plot
(1) 747-14th Street empty plot
(1) 66 Belcher empty bed no tree
(1) 68 Belcher empty bed not tree
(1) 49 Belcher empty plot
(1) 44 Belcher empty plot
(1) 49 Belcher empty plot
(1) 39-41 Sanchez empty plot
(1) 85 Sanchez empty plot
(1) 785 – 14th Street empty plot
(1) 69 Henry empty plot
(1) 78-82 Henry empty plot
(1) 114a Noe empty plot
(1) 905 – 14th Street empty plot
(1) 545 Duboce empty plot
(1) 74-76 Walter no tree in planting bed
(1) 70-72 Walter not tree in planting bed
(1) 79-81 Walter not tree in planting bed
(1) 65 Walter empty plot
(1) 42 Walter empty plot
(1) 34 Walter empty plot
(1) 27 Walter empty plot
(1) 23 Walter empty plot
(1) 841-845 -14th Street empty plot
(1) 111 Noe empty plot
(1) 228 Noe with stump

(1) 221 Noe empty no tree in planting bed
(1) 235-239 Noe empty plot
(3) 2306 Market on 16th Street side of the property three empty planting beds
(1) 2262-2264 15th Street small stem in plot
(1) 161-167 Castro with stump
(1) 149-151 Henry empty plot with plant box covering plot
(1) 101-109 Castro empty plot on 14th Street side of the property
(1) 1 Scott empty plot on Duboce side of the property
(1) 52-98 Scott plot with stump
(3) 95-97 Scott three empty tree boxes on the Waller side of the property
(1) 65 Carmelita empty plot with flowers
(1) 627 Waller planter bed with no tree
(1) 71-75 Potomac with stump
(1) 65 Potomac empty plot
(1) 212 Steiner on Lausset side of the property empty plot
(1) 220 Divisadero empty plot with plants
(1) 722 Waller empty plot
(1) 9-11 Castro empty plot with pot covering plot
(1) 214-216 Divisadero empty plot
(1) 254 Divisadero empty plot
(1) 272 Divisadero empty plot
(1) 286 Divisadero empty plot
(1) 963 Page plant vs. tree in plot
(1) 940 Page empty planting bed no tree
(1) 301-303 Scott empty plot
*** 401-499 Page entrances to each property missing trees**
(1) 400 Page dead tree

THE ABOVE SURVEY IS THE PROPERTY OF

SAN FRANCISCO TREE CAMPAIGN

https://sanfranciscotreecampaign.blogspot.com

From:	Margaret Dietz
To:	CPC-Commissions Secretary; Carroll, John (BOS); Melgar, Myrna (BOS); Chen, Chyanne (BOS); Mahmood, Bilal (BOS)
Cc:	ChenStaff; MelgarStaff (BOS); MahmoodStaff; Gluckstein, Lisa (CPC); Lozano, Jesus (ENV); DPW, Urbanforestry (DPW); Short, Carla (DPW); Moore, David (DPW)
Subject:	Amend File 251211: Stop the Unregulated In-Lieu Fee Expansion
Date:	Friday, April 17, 2026 2:29:33 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Members of the Land Use Committee, Planning Commission, and Urban Forestry Council,

I am writing to oppose the street tree legislation in Board File 251211.

Allowing developers to pay a $2,590 fee instead of planting a street tree is a gift to the real estate industry. Developers will choose the fee over navigating the City's planting requirements. The City must focus on streamlining the permitting process rather than allowing developers to buy their way out of providing essential green infrastructure.

This legislation is being sold under a false equity narrative. The legislative digest claims these pooled fees will go to "low-canopy areas." The actual text of the ordinance deposits these fees into the general Adopt-A-Tree Fund with no geographic spending restrictions. Without a statutory requirement to spend these funds in designated Environmental Justice communities, this expansion creates an unregulated slush fund.

Public Works cannot manage its existing in-lieu fees. In February 2023, the department collected $242,000 from UCSF to plant 105 replacement trees. Exactly zero have been planted so far. The department is not even using the funds they have right now. Furthermore, the department administratively canceled over 900 active 311 requests for tree replacement in empty sidewalk basins in December 2025.

The legislation also eliminates the public right to appeal "hazard" tree removals without defining what constitutes a hazard. This allows the City to label any inconvenient tree as hazardous to fast-track its removal without public oversight.

The City must reject this proposal entirely or substantially amend it. Any amendment must raise the fee to reflect the true cost of planting and maintaining a tree. It must strictly dictate where the funds are spent using clear definitions for "high environmental justice burden" and "low canopy." Finally, it must preserve the public's right to appeal tree removals and mandate transparency for hazard designations.

Sincerely,
Margaret Dietz
Russian Hill - Van Ness Corridor

From:	Board of Supervisors (BOS)
To:	BOS-Supervisors; BOS-Legislative Aides
Cc:	Calvillo, Angela (BOS); Mchugh, Eileen (BOS); Somera, Alisa (BOS); De Asis, Edward (BOS); Ng, Wilson (BOS); Carroll, John (BOS); BOS Legislation, (BOS); BOS-Operations
Subject:	FW: Strong Opposition to File No. 251211
Date:	Thursday, April 16, 2026 9:26:48 AM
Attachments:	WESTERN ADDITION and Hayes Valley Survey April 2026.docx Tenderloin Tree Survey March 25, 2026.docx

Hello Supervisors,

Please see attached and below communication from John Nulty with the Tenderloin Tree Campaign, regarding:

> **File No. 251211:** Ordinance amending the Public Works Code to allow development projects to satisfy street tree planting requirements through payment of an in lieu fee or providing alternative landscaping; exempt accessory dwelling units from street tree planting requirements; eliminate appeals to the Board of Appeals for tree removals undertaken by City departments and commissions; and update in lieu fee reporting requirements; amending the Administrative Code to create a separate account within the Adopt-A-Tree Fund to receive in lieu fees for street tree requirements; amending the Planning Code to update street tree applicability requirements; affirming the Planning Department's determination under the California Environmental Quality Act; making findings of consistency with the General Plan, and the eight priority policies of Planning Code, Section 101.1; and making public necessity, convenience, and welfare findings under Planning Code, Section 302.

Sincerely,

Justice Alcantar
Office of the Clerk of the Board
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
Phone: (415) 554-5184 | Fax: (415) 554-5163
board.of.supervisors@sfgov.org | www.sfbos.org

From: tenderloin treecampaign <tenderlointreecampaign@yahoo.com>
Sent: Thursday, April 9, 2026 5:01 PM
To: Board of Supervisors (BOS) <board.of.supervisors@sfgov.org>
Cc: Carroll, John (BOS) <john.carroll@sfgov.org>
Subject: Strong Opposition to File No. 251211

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Board of Supervisors, City and County of San Francisco
Land Use and Transportation Committee
c/o Clerk of the Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
Email: clerk.boardofsupervisors@sfgov.org

Re: Strong Opposition to File No. 251211

Ordinance Amending Public Works, Administrative, and Planning Codes Regarding Street Trees (Eliminating Public Appeals for City-Initiated Tree Removals and Related Changes)

Submitted by: [Tenderloin Tree Campaign/ Advocate, Board of Supervisors District 5 (Tenderloin, Hayes Valley and Western Addition)

Date: April 9, 2026

(Tenderlion Tree Campaign attach your District 5 Empty Street Tree Plot List as supporting documentation)

The message calls on San Franciscans to act now to safeguard the city's urban forest. It opposes upcoming legislation that would let developers pay a fee instead of planting trees, weaken public appeals of "hazard" tree removals, and shorten the time window for citizens to contest city-initiated tree cuts. The key concerns are:

Developer incentives: Allowing a cash-in-lieu option will likely lead to fewer trees, as developers view planting as a hassle.
Hazard-tree transparency: Removing the public's right to appeal "hazard" designations could be abused without strong oversight and clear, consistent criteria.
Public participation: Compressing appeal timelines for city-driven removals limits residents' ability to gather information and mount effective defenses for trees.

The overall plea is to preserve tree planting requirements, maintain robust public oversight, and ensure that San Francisco's dwindling canopy is protected—especially given the city's climate-emergency commitments.

Tenderloin/North of Market Tree Survey

March 26, 2026

(2) 101 Polk on Dr. Tom Weddell Place side property with stumps

(1) 99 Grove empty plot

(3) 300 Van Ness & Grove tree plot bed total 6 trees missing

(3) 300 Van Ness & McAllister tree plot bed total 6 trees missing

(1) 525 Golden Gate empty plot

(1) 590 Van Ness empty plot

(1) 555 Polk empty plot

(1) 650 Turk Street empty plot

(2) 750 Van Ness empty plots

(1) 747 Eddy empty plot

(1) 700 Eddy empty plot

(1) 640 Polk empty plot

(1) 620 Polk empty plot

(1) 610 Polk empty plot

(1) 691 Eddy empty plot

(1) 665 Eddy empty plot

(2) Eddy 1 empty plot

1 with stump in plot

(1) 700 Eddy on Polk side of property empty plot

(2) 731 Polk on Willow side of property empty plots

(1) 726 Polk on Ellis side of property empty plot

(1) 759-763 Ellis plot with stump

(1) 741Ellis empty plot

(1) 707 Ellis empty plot

(1) 869 Ellis empty plot

(1) 840 Van Ness empty plot

(2) 818 Van Ness empty plots on Willow side of property

(4) 750 Eddy on Willow side of property four empty plots

(3) 1000 Van Ness 1 empty plot

2 empty plots on Myrtle side of property

(1) 1040 Geary empty plot with stump

(2) 1029 Geary empty plots

(2) 999 Geary empty plots on Myrtle side of property

(3) 990 Geary 3 empty plots on Myrtle side of property

(1) 825 Larkin empty plot

(1) 909 Geary empty plot on Larkin side of property

(1) 925 Geary empty plot

(2) 965 Geary 2 empty plots

(1) 750 O'Farrell empty plot

(2) 730 Larkin 2 empty plots

(1) 655 Ellis empty plot

(1) 835 Larkin empty plot

(1) 909 Geary empty plot on Larkin side of property

(1) 925 Geary empty plot

(2) 965 Geary empty plots

(1) 677 Ellis empty plot

(1) 664 Larkin empty plot

(1) 556 Larkin with stump

(4) 555 Larkin (3) on Larkin side of the property

(1) on Turk side of the property

(1) 447-451 Turk empty plot

(1) 358 Golden Gate empty plot

(2) 250 McAllister 2 empty plots

(7) 200 Larkin 2 empty plots on McAllister side of property

5 empty plots on Fulton side of property

(1) 100 Larkin 1 empty plot on Grove side property next to Hyde

(1) 248 Golden Gate empty plot

(1) 101 Hyde empty plot

(2) 155 Hyde empty plots

(5) 50 UN Plaza 5 empty plots in plaza next to Hyde street

(1) 381 Turk empty plot

(2) 259 Hyde 2 empty plots on Eddy side of property

(1) 455 Eddy with stump

(1) 555 Ellis empty plot

(1) 570 Ellis empty plot

(1) 707 O'Farrell empty plot

(1) 656 O'Farrell empty plot

(1) 626 O'Farrell with stump

(1) 825 Geary empty plot

(2) 765 Geary 1 dying tree in plot

(1) 747 Geary 1 dying tree in plot

(1) 735 Geary 1 dying tree in plot

(1) 667-669 Geary empty plot

(1) 550 Leavenworth empty plot

(1) 540 O'Farrell empty plot

(1) 525 O'Farrell empty plot

(2) 545 O'Farrell 1 empty plot

1 with stump

(1) 434 Leavenworth empty plot

(3) 480 Ellis (2) empty plots on Ellis

(1) empty plot on Leavenworth side of property

(1) 391 Leavenworth empty plot

(2) 345 Leavenworth empty plots

(1) 335 Leavenworth empty plot

(1) 240 Leavenworth empty plot with 3 poles and bag

(1) 222 Leavenworth empty plot

(1) 237 Leavenworth tree cut in half

(1) 294 Turk on Leavenworth side of property with stump

(1) 240 Turk empty plot

(5) 201 Turk Five empty plots

(1) 275 Turk empty plot

(1) 191 Golden Gate on Leavenworth side of property with 3 poles

(1) 86 Mc Allister plot with stump

(1) 50 Jones empty plot

(2) 121 Golden Gate on Jones side of property empty plots

(1) 180 Jones no tree 4 poles, 4 braces and screen in plot

(1) 265 Eddy empty plot

(4) 246 Eddy 1 empty plot on Eddy

2. stumps on Jones side of property

(1) empty plot on Ellis side of property

(1) 230 Eddy on Jones side of property with stump

(1) 345 Jones empty plot with pole

(1) 387 Ellis with 2 foot wide stump

(1) 201 Ellis with 2 poles

(1) 424 Jones empty plot

(3) 450 Jones 3 empty plots

(2) 516 O'Farrell 1 empty plot

1 with two poles & bag

(1) 520 Jones 1 planter box empty

(1) 532 Jones empty plot with 2 poles

(1) 540 Jones empty plot with 1 pole

(1) 545 Jones empty plot

(1) 634 Geary empty plot

(2) 333 Taylor pot with 3 poles, braces and screen

1 plot with stump

(1) 231 Ellis empty plot

(1) 222 Taylor empty plot with stump & 3 poles

(1) 960 Market on Turk side of property with stump, 3 poles & braces

(1) 55 Mason empty plot

(2) 1129 Market empty plots

(1) 1236 Market empty plot

(1) 1240 Market empty plot

Total trees survey 168 in 117 different locations

North of Market is Van Ness to Geary to Market

Total of 70 square blocks covered

THE ABOVE SURVEY IS THE PROPERTY OF:

TENDERLOIN TREE COMMITTEE

WESTERN ADDITION & HAYES VALLEY

APRIL 2026

(1) 58 Octavia empty plot

(1) 188 Octavia two + empty planting area

(6) 55 Page 6 boxes no trees

(1) 20 Page empty plot

(1) 10 Page empty plot

(2) 129-150 Oak on Lily side of property one with stump

(1) 129-150 Oak empty plot

(2) 96 Franklin two empty plots on Oak side of the property

(3) 50 Oak three empty plots on Hickory side of the property

(1) 141 Fell empty plot

(1) 141-155 Fell empty plot

+ 100 Van Ness empty planting beds

35 Van Ness 8 empty beds

One empty plot on Fell side of the property

One empty plot on Van Ness

(3) 401 Van Ness three empty plots on Hayes side of the property

(2) 333 Franklin one empty plot and one on Linden side of the property

(1) 201 Hayes plot with stump on Linden side of the property

(1) 250 Hayes empty plot

(2) 280 Fell empty plots on the Linden side of the property

(5+) 300-321 Linden five empty beds one empty tree plot

(2) 400 Octavia two empty plots

(1) 377-385 Hayes plot with stump

(1) 364 Hayes empty plot

(1) 233 Franklin empty plot on Hayes side of the property

4+ 201 Van Ness one empty plot and three empty planting beds

(1) 301 Van Ness missing tree

(2) 461 Van Ness two missing trees

(4) 555 Franklin empty plot and three empty plots on Fulton side of the property

(1)365 Fulton empty plot

(1) 520 Grove empty plot

(1) 363-365 Grove empty plot

(1) 467 Grove empty plot

(1) 425 Grove with stump

(1) 450 Fulton empty plot

(1) 742 McAllister with stump

(2) 756 McAllister missing trees on each side of the walkway entrance

(2) 768 McAllister missing trees on each side of the walkway entrance

(1) 785 McAllister empty plot

(2) 808 McAllister missing trees on each side of the walkway entrance

(1) 860 McAllister with stump

(1) 870 McAllister empty plot

(1) 900 McAllister on Laguna side of the property empty plot

(1) 887 McAllister across the street with stump

(5) 500 Van Ness five empty planting beds

(2) 701 Van Ness empty plot and empty plot on Turk side of the property

(1) 745 Franklin empty plot

(2) 801 Turk empty plot and empty plot on Elm side of the property

(1) 835 Turk empty plot

+ 900 Turk no trees next to fence and empty plot next to the soccer field

(24) 1040 Eddy empty plots inside field

(1) 1010 Eddy empty plot on Gough side of the property

(2) 990 Eddy two empty plots on Gough side of the property

(1) 920 Eddy plot with stump

(1) 923 Eddy empty plot

(3) 909 Franklin one with stump

Two on Eddy side of the property 1 with stump

(6) 885 Franklin six empty plots

(3) 807 Franklin three empty plots

(4) 799 Van Ness three empty plots on Larch side of the property

Stump on Van Ness

(1) 819 Van Ness empty plot

(1) 851 Van Ness empty plot

(1) 939 Ellis empty plot on Willow side of the property

(2) 950 Franklin on Willow side of the property one with stump

(1) 860 Eddy empty plot

(5) 1000 Franklin five empty plots

(1) 231 Olive empty plot

(2) 999 Van Ness two empty plots on Olive side of the property

(3) 1031 Franklin three empty plots

(2) 1100 Gough empty plot and Ellis side of the property empty plot

(1) 1100 Ellis on Gough side of the property empty plot

(1) 1250 Laguna empty plot on the Ellis side of the property

(10) 45-85 Cleary 7 Stumps in planting areas and 1 empty plot

Two empty plots on Ellis side of the property

(2) 1335 Laguna two empty plots

(1) 1315 Laguna empty plot

(3) 1355 Laguna three empty plots

(1) Quick stop Lane empty plot

(2) 621 Willow empty plot and one across the street

(1) 651-655 Willow empty plot

(1) 1398 Buchanan empty plot

(1) 1300 Buchanan with stump

(1) 1295 Eddy empty plot

(2) 1258-1288 Buchanan empty plot and empty plot on Eddy side of the property

(1) 1355 Eddy empty plot

(3) 1170 Webster three empty plots on Eddy side of the property

(3) 1280 Webster two empty plots and one on Ellis side of the property

(1) 1519-1523 O'Farrell stump in plot

(1) Zump Lane on Geary empty plot

(1) Lottie Bernnice on Geary empty plot

(1) 1465 Laguna empty plot

(1) 1435 Laguna empty plot

(1) 1450 Laguna empty plot

(1) 1570 Post with stump

(1) 1776 Sutter loop of trunk

(1) 1750 Sutter empty plot

(1) 1729-1731 Sutter empty plot

(2) 1691 Laguna two empty plots

(2) 1649-1653 Laguna two empty plots

(1) 1700 Laguna on Sutter side of the property empty plot

(1) 1755 Sutter with stump

(1) 1700 Sutter empty plot

(1) 1825 Post empty plot on Webster side of the property

(2) 1881 Post on Fillmore side of the property one with stump

(1) 1637 Fillmore with stump

+ 1600 Webster medium missing trees

(1) 1747 Buchanan on Sutter side of the property empty plot

(1) 1826 Buchanan empty plot

(2) 1868 Buchanan two empty plots on Bush side of the property

(1) 1825 Bush empty plot

(1) 1615 Sutter empty plot

(1) 1719 Bush empty plot

(1) 1760 Bush empty plot

(1) 1715 Octavia empty plot

(1) 195301957 Pine with stump

(1) 1861-1863 Laguna empty plot on Pine side of the property

(1) 2003 Pine empty plot

(1) 2158 Pine empty plot

(1) 2189 Pine empty plot

(2) 2205 Pine two empty plots

(2) 2109-2111 Bush two empty plots

(1) 1899 Fillmore on Bush side of the property empty plot

(2) 1880 Fillmore two empty plots on Bush side of the property

(1) 1856 Fillmore empty plot

(2) 1669 Fillmore one plot with stump

(1) 1560 Fillmore on Geary side of the property empty plot

(1) 1555 Fillmore empty plot

(10+) 1330 Fillmore on Ellis side of the property empty tree beds

(2) 1310 Fillmore two empty plots

(1) 1260 Fillmore empty plot

(1) 1240 Fillmore empty plot

(1) 1201 Fillmore empty plot

(2) 1150 Fillmore two empty plots

(1) 1125 Fillmore empty plot

(4) 1100 Fillmore empty plot

Three empty plots on Golden Gate side of the property

(1) 1117 Fillmore empty plot

(2) 1540 McAllister two empty plots

(1) 1025 Fillmore with stump

(1) 889 Fulton empty plot

(1) 875 Fulton empty plot

(2) on Friendship Alley on either side of the Alley front empty plots

(1) 805 Webster empty plot

+ Webster between Fulton and Grove medium need more trees and stump

(1) 600 Webster plot need tree

(3) 645 Hayes empty plot two empty plots on Buchanan side of the property

(4) 602-618 Buchanan four empty planter beds

(1) 477 Hickory empty plot

(1) 471 Hickory empty plot

(1) 500 Buchanan on Oak side of the property empty plot

(1) 501 Oak with stump

(2) 370 Page two empty plots

(2) 364 Page two empty plots

(1) 300 Buchanan empty plot

(1) 295 Buchanan empty plot on Haight side of the property

(2) 200 Buchanan two empty plots

(2) 2175 Market one with stump

1 empty plot with 2 poles

(1) 2109 Market in medium stump of palm tree

(1) 2101 Market on Church side of the property empty plot

(1) 2059 Market on 14th Street side of the property empty plot

(1) 2027 Market empty plot

(1) 1800 Market on Waller side of the property 1 brunt dead tree

(1) 80 Octavia on Market street side of the property empty plot

(1) 1844 Market Street empty plot

(2) 52 Waller two stumps

(1) 60 Waller one stump

(1) 74 Waller empty plot

(1) 86 Waller with stump

(1) 41 Waller empty plot

(1) 67 Waller empty plot

(1) 155 Haight empty plot

(3) 100 Laguna three dead trees

(1) 137 Haight empty plot

(1) 115 Haight empty plot

(3) 180-188 Haight three beds without trees

(1) 214 Haight empty plot

(1) 218 Haight empty plot

(1) 333 Haight empty plot

(2) 379-381 Haight empty plot

(1) 325 Haight empty plot

(1) 358-360 Haight empty plot

(1) 135 Webster empty plot

+ 222 Webster on side of the property no trees

(1) 430-432 Page 1 dead tree

(1) 507 Haight empty plot

(1) 535 Haight empty plot

(3) 237 Luaussat three empty plots

(1) 59-61 Germania empty plot

(3) 47 Germania three empty barrels

(1) 119 Fillmore on Germania side of the property with stump

(1) 115 Germania empty plot

(1) 212 Steiner empty plot

(1) 728 Page 1 dead tree with 3 poles, 3 braces and bag

(1) 267 Pierce no tree

(1) 627 Waller not tree

(3) 100 Scott three no trees

(1) 254 Divisadero empty plot

(1) 272 Divisadero empty plot

(1) 286 Divisadero empty plot

(1) 955 Page with stump

(1) 949 Page with stump

(1) 940 Page empty plot

(1) 301 Scott empty plot

(2) 799 Oak two empty plots on Scott side of the property

(1) 987 Oak empty plot

(1) 1001 Oak with stump

(1) 1025 Oak empty plot

(1) 44 Divisadero with stump

(1) 1175 Fell on Divisadero side of the property with stump

(1) 1129 Fell empty plot

(1) 486 Scott on Fillmore side of the property with stump

(1) 465 Scott empty plot

(1) 460 Scott empty plot on Fell side of the property

(1) 520 Scott empty plot

(3) 556-560 Hayes three plots no trees

(1) 1250 Hayes empty plot

(1) 1282 Hayes two empty plots

(1) 650 Divisadero on Grove side of the property loop of stem

(1) 1250 Grove empty plot

(1) 1234 Grove no tree in plot

(1) 701 Scott on Grove side of the property empty plot

(1) 1280 Fulton empty plot

(1) 810 Divisadero empty plot

+ between Fell and McAllister on medium on Divisadero missing trees

(1) 1451 McAllister empty plot

(1) 1592 McAllister empty plot

(1) 1111 Scott on Turk side of the property with stump

(1) 2 Seymour St empty plot

(1) 1042 Divisadero empty plot

(1) 1012 Divisadero empty plot

(1) 1101 Divisadero empty plot

(1) 1207 Divisadero empty plot

(1) 1828 Eddy empty plot

(1) 1865-1875 Eddy empty plot

(1) 1171 Scott with stump

(1) 1150 Scott empty plot

(1) 1177 Pierce empty plot

(3) 1835 Ellis two empty plots on Pierce side of the property

One across the street empty plot

(3) 1201-1299 Pierce empty plot, with stump and one with stump

(4) 1801 Ellis three stumps and on empty plot

(1) 1940 Ellis empty pot on Buchanan side of the property

(1) 1450 Divisadero empty plot

(1) 2141 Geary with stump

+ Geary medium between Divisadero and Scott missing trees

(1) 1426 Steiner empty plot

(1) 1795 O'Farrell empty plot

(2) 1430 Scott two empty plots on Geary side of the property

(1) 1440 Turk empty plot on Steiner side of the property

(2) 1399 Golden Gate empty plot and one with stump

(1) 1025 Steiner with stump

(1) 949 Steiner with stump

(1) 911-913 Steiner empty plot

(1) 722 Steiner on Grove side of the property empty plot

(2) 1099 Hayes on Pierce side of the property with stumps

(2) 1000 Fell two empty plots

(1) 590 Steiner empty plot

(1) 510 Steiner on Oak side of the property empty plot

(1) 579 Haight box without a tree

(1) 569 Haight empty plot

(1) 533 Haight empty plot

THE ABOVE SURVEY IS THE PROPERTY OF

TENDERLOIN TREE COMMITTEE

Mr. John Nulty co-chair
Tenderloin Tree Campaign
P. O. Box 421949
San Francisco, CA 94142-1949
https://url.avanan.click/v2/r01/___http://tenderlointreecampaign.blogspot.com/___.YXAzOnNmZHQyOmE6bzowMDYxMmM1YjgyZjRmMDI2YTUyNWYwNzUxNTE3YmZmYTo3OmU2N2M6NGE3Y2MxZDJmNzUyYzkxZTM1NDEwMTE3NDBhZjIyODE2NmIzMTczY2FmMmNiZjllNjZhM2YyMWYyYjdjMGRjMDp0OlQ6Tg

WESTERN ADDITION & HAYES VALLEY
APRIL 2026

(1) 58 Octavia empty plot
(1) 188 Octavia two + empty planting area
(6) 55 Page 6 boxes no trees
(1) 20 Page empty plot
(1) 10 Page empty plot
(2) 129-150 Oak on Lily side of property one with stump
(1) 129-150 Oak empty plot
(2) 96 Franklin two empty plots on Oak side of the property
(3) 50 Oak three empty plots on Hickory side of the property
(1) 141 Fell empty plot
(1) 141-155 Fell empty plot
+ 100 Van Ness empty planting beds
35 Van Ness 8 empty beds
One empty plot on Fell side of the property
One empty plot on Van Ness
(3) 401 Van Ness three empty plots on Hayes side of the property
(2) 333 Franklin one empty plot and one on Linden side of the property
(1) 201 Hayes plot with stump on Linden side of the property
(1) 250 Hayes empty plot
(2) 280 Fell empty plots on the Linden side of the property
(5+) 300-321 Linden five empty beds one empty tree plot
(2) 400 Octavia two empty plots
(1) 377-385 Hayes plot with stump
(1) 364 Hayes empty plot
(1) 233 Franklin empty plot on Hayes side of the property
4+ 201 Van Ness one empty plot and three empty planting beds
(1) 301 Van Ness missing tree
(2) 461 Van Ness two missing trees
(4) 555 Franklin empty plot and three empty plots on Fulton side of the property
(1)365 Fulton empty plot
(1) 520 Grove empty plot
(1) 363-365 Grove empty plot
(1) 467 Grove empty plot
(1) 425 Grove with stump
(1) 450 Fulton empty plot
(1) 742 McAllister with stump
(2) 756 McAllister missing trees on each side of the walkway entrance
(2) 768 McAllister missing trees on each side of the walkway entrance
(1) 785 McAllister empty plot
(2) 808 McAllister missing trees on each side of the walkway entrance
(1) 860 McAllister with stump
(1) 870 McAllister empty plot

(1) 900 McAllister on Laguna side of the property empty plot
(1) 887 McAllister across the street with stump
(5) 500 Van Ness five empty planting beds
(2) 701 Van Ness empty plot and empty plot on Turk side of the property
(1) 745 Franklin empty plot
(2) 801 Turk empty plot and empty plot on Elm side of the property
(1) 835 Turk empty plot
+ 900 Turk no trees next to fence and empty plot next to the soccer field
(24) 1040 Eddy empty plots inside field
(1) 1010 Eddy empty plot on Gough side of the property
(2) 990 Eddy two empty plots on Gough side of the property
(1) 920 Eddy plot with stump
(1) 923 Eddy empty plot
(3) 909 Franklin one with stump
Two on Eddy side of the property 1 with stump
(6) 885 Franklin six empty plots
(3) 807 Franklin three empty plots
(4) 799 Van Ness three empty plots on Larch side of the property
Stump on Van Ness
(1) 819 Van Ness empty plot
(1) 851 Van Ness empty plot
(1) 939 Ellis empty plot on Willow side of the property
(2) 950 Franklin on Willow side of the property one with stump
(1) 860 Eddy empty plot
(5) 1000 Franklin five empty plots
(1) 231 Olive empty plot
(2) 999 Van Ness two empty plots on Olive side of the property
(3) 1031 Franklin three empty plots
(2) 1100 Gough empty plot and Ellis side of the property empty plot
(1) 1100 Ellis on Gough side of the property empty plot
(1) 1250 Laguna empty plot on the Ellis side of the property
(10) 45-85 Cleary 7 Stumps in planting areas and 1 empty plot
Two empty plots on Ellis side of the property
(2) 1335 Laguna two empty plots
(1) 1315 Laguna empty plot
(3) 1355 Laguna three empty plots
(1) Quick stop Lane empty plot
(2) 621 Willow empty plot and one across the street
(1) 651-655 Willow empty plot
(1) 1398 Buchanan empty plot
(1) 1300 Buchanan with stump
(1) 1295 Eddy empty plot
(2) 1258-1288 Buchanan empty plot and empty plot on Eddy side of the property
(1) 1355 Eddy empty plot
(3) 1170 Webster three empty plots on Eddy side of the property
(3) 1280 Webster two empty plots and one on Ellis side of the property

(1) 1519-1523 O'Farrell stump in plot
(1) Zump Lane on Geary empty plot
(1) Lottie Bernnice on Geary empty plot
(1) 1465 Laguna empty plot
(1) 1435 Laguna empty plot
(1) 1450 Laguna empty plot
(1) 1570 Post with stump
(1) 1776 Sutter loop of trunk
(1) 1750 Sutter empty plot
(1) 1729-1731 Sutter empty plot
(2) 1691 Laguna two empty plots
(2) 1649-1653 Laguna two empty plots
(1) 1700 Laguna on Sutter side of the property empty plot
(1) 1755 Sutter with stump
(1) 1700 Sutter empty plot
(1) 1825 Post empty plot on Webster side of the property
(2) 1881 Post on Fillmore side of the property one with stump
(1) 1637 Fillmore with stump
+ 1600 Webster medium missing trees
(1) 1747 Buchanan on Sutter side of the property empty plot
(1) 1826 Buchanan empty plot
(2) 1868 Buchanan two empty plots on Bush side of the property
(1) 1825 Bush empty plot
(1) 1615 Sutter empty plot
(1) 1719 Bush empty plot
(1) 1760 Bush empty plot
(1) 1715 Octavia empty plot
(1) 195301957 Pine with stump
(1) 1861-1863 Laguna empty plot on Pine side of the property
(1) 2003 Pine empty plot
(1) 2158 Pine empty plot
(1) 2189 Pine empty plot
(2) 2205 Pine two empty plots
(2) 2109-2111 Bush two empty plots
(1) 1899 Fillmore on Bush side of the property empty plot
(2) 1880 Fillmore two empty plots on Bush side of the property
(1) 1856 Fillmore empty plot
(2) 1669 Fillmore one plot with stump
(1) 1560 Fillmore on Geary side of the property empty plot
(1) 1555 Fillmore empty plot
(10+) 1330 Fillmore on Ellis side of the property empty tree beds
(2) 1310 Fillmore two empty plots
(1) 1260 Fillmore empty plot
(1) 1240 Fillmore empty plot
(1) 1201 Fillmore empty plot
(2) 1150 Fillmore two empty plots

(1) 1125 Fillmore empty plot
(4) 1100 Fillmore empty plot
Three empty plots on Golden Gate side of the property
(1) 1117 Fillmore empty plot
(2) 1540 McAllister two empty plots
(1) 1025 Fillmore with stump
(1) 889 Fulton empty plot
(1) 875 Fulton empty plot
(2) on Friendship Alley on either side of the Alley front empty plots
(1) 805 Webster empty plot
+ Webster between Fulton and Grove medium need more trees and stump
(1) 600 Webster plot need tree
(3) 645 Hayes empty plot two empty plots on Buchanan side of the property
(4) 602-618 Buchanan four empty planter beds
(1) 477 Hickory empty plot
(1) 471 Hickory empty plot
(1) 500 Buchanan on Oak side of the property empty plot
(1) 501 Oak with stump
(2) 370 Page two empty plots
(2) 364 Page two empty plots
(1) 300 Buchanan empty plot
(1) 295 Buchanan empty plot on Haight side of the property
(2) 200 Buchanan two empty plots
(2) 2175 Market one with stump
1 empty plot with 2 poles
(1) 2109 Market in medium stump of palm tree
(1) 2101 Market on Church side of the property empty plot
(1) 2059 Market on 14th Street side of the property empty plot
(1) 2027 Market empty plot
(1) 1800 Market on Waller side of the property 1 brunt dead tree
(1) 80 Octavia on Market street side of the property empty plot
(1) 1844 Market Street empty plot
(2) 52 Waller two stumps
(1) 60 Waller one stump
(1) 74 Waller empty plot
(1) 86 Waller with stump
(1) 41 Waller empty plot
(1) 67 Waller empty plot
(1) 155 Haight empty plot
(3) 100 Laguna three dead trees
(1) 137 Haight empty plot
(1) 115 Haight empty plot
(3) 180-188 Haight three beds without trees
(1) 214 Haight empty plot
(1) 218 Haight empty plot
(1) 333 Haight empty plot

(2) 379-381 Haight empty plot
(1) 325 Haight empty plot
(1) 358-360 Haight empty plot
(1) 135 Webster empty plot
+ 222 Webster on side of the property no trees
(1) 430-432 Page 1 dead tree
(1) 507 Haight empty plot
(1) 535 Haight empty plot
(3) 237 Luaussat three empty plots
(1) 59-61 Germania empty plot
(3) 47 Germania three empty barrels
(1) 119 Fillmore on Germania side of the property with stump
(1) 115 Germania empty plot
(1) 212 Steiner empty plot
(1) 728 Page 1 dead tree with 3 poles, 3 braces and bag
(1) 267 Pierce no tree
(1) 627 Waller not tree
(3) 100 Scott three no trees
(1) 254 Divisadero empty plot
(1) 272 Divisadero empty plot
(1) 286 Divisadero empty plot
(1) 955 Page with stump
(1) 949 Page with stump
(1) 940 Page empty plot
(1) 301 Scott empty plot
(2) 799 Oak two empty plots on Scott side of the property
(1) 987 Oak empty plot
(1) 1001 Oak with stump
(1) 1025 Oak empty plot
(1) 44 Divisadero with stump
(1) 1175 Fell on Divisadero side of the property with stump
(1) 1129 Fell empty plot
(1) 486 Scott on Fillmore side of the property with stump
(1) 465 Scott empty plot
(1) 460 Scott empty plot on Fell side of the property
(1) 520 Scott empty plot
(3) 556-560 Hayes three plots no trees
(1) 1250 Hayes empty plot
(1) 1282 Hayes two empty plots
(1) 650 Divisadero on Grove side of the property loop of stem
(1) 1250 Grove empty plot
(1) 1234 Grove no tree in plot
(1) 701 Scott on Grove side of the property empty plot
(1) 1280 Fulton empty plot
(1) 810 Divisadero empty plot
+ between Fell and McAllister on medium on Divisadero missing trees

(1) 1451 McAllister empty plot
(1) 1592 McAllister empty plot
(1) 1111 Scott on Turk side of the property with stump
(1) 2 Seymour St empty plot
(1) 1042 Divisadero empty plot
(1) 1012 Divisadero empty plot
(1) 1101 Divisadero empty plot
(1) 1207 Divisadero empty plot
(1) 1828 Eddy empty plot
(1) 1865-1875 Eddy empty plot
(1) 1171 Scott with stump
(1) 1150 Scott empty plot
(1) 1177 Pierce empty plot
(3) 1835 Ellis two empty plots on Pierce side of the property
One across the street empty plot
(3) 1201-1299 Pierce empty plot, with stump and one with stump
(4) 1801 Ellis three stumps and on empty plot
(1) 1940 Ellis empty pot on Buchanan side of the property
(1) 1450 Divisadero empty plot
(1) 2141 Geary with stump
+ Geary medium between Divisadero and Scott missing trees
(1) 1426 Steiner empty plot
(1) 1795 O'Farrell empty plot
(2) 1430 Scott two empty plots on Geary side of the property
(1) 1440 Turk empty plot on Steiner side of the property
(2) 1399 Golden Gate empty plot and one with stump
(1) 1025 Steiner with stump
(1) 949 Steiner with stump
(1) 911-913 Steiner empty plot
(1) 722 Steiner on Grove side of the property empty plot
(2) 1099 Hayes on Pierce side of the property with stumps
(2) 1000 Fell two empty plots
(1) 590 Steiner empty plot
(1) 510 Steiner on Oak side of the property empty plot
(1) 579 Haight box without a tree
(1) 569 Haight empty plot
(1) 533 Haight empty plot

THE ABOVE SURVEY IS THE PROPERTY OF
TENDERLOIN TREE COMMITTEE

Tenderloin/North of Market Tree Survey
March 26, 2026

(2) 101 Polk on Dr. Tom Weddell Place side property with stumps
(1) 99 Grove empty plot
(3) 300 Van Ness & Grove tree plot bed total 6 trees missing
(3) 300 Van Ness & McAllister tree plot bed total 6 trees missing
(1) 525 Golden Gate empty plot
(1) 590 Van Ness empty plot
(1) 555 Polk empty plot
(1) 650 Turk Street empty plot
(2) 750 Van Ness empty plots
(1) 747 Eddy empty plot
(1) 700 Eddy empty plot
(1) 640 Polk empty plot
(1) 620 Polk empty plot
(1) 610 Polk empty plot
(1) 691 Eddy empty plot
(1) 665 Eddy empty plot
(2) Eddy 1 empty plot
1 with stump in plot
(1) 700 Eddy on Polk side of property empty plot
(2) 731 Polk on Willow side of property empty plots
(1) 726 Polk on Ellis side of property empty plot
(1) 759-763 Ellis plot with stump
(1) 741Ellis empty plot
(1) 707 Ellis empty plot
(1) 869 Ellis empty plot
(1) 840 Van Ness empty plot
(2) 818 Van Ness empty plots on Willow side of property
(4) 750 Eddy on Willow side of property four empty plots
(3) 1000 Van Ness 1 empty plot
2 empty plots on Myrtle side of property
(1) 1040 Geary empty plot with stump
(2) 1029 Geary empty plots
(2) 999 Geary empty plots on Myrtle side of property
(3) 990 Geary 3 empty plots on Myrtle side of property
(1) 825 Larkin empty plot
(1) 909 Geary empty plot on Larkin side of property
(1) 925 Geary empty plot
(2) 965 Geary 2 empty plots
(1) 750 O'Farrell empty plot
(2) 730 Larkin 2 empty plots
(1) 655 Ellis empty plot
(1) 835 Larkin empty plot

(1) 909 Geary empty plot on Larkin side of property
(1) 925 Geary empty plot
(2) 965 Geary empty plots
(1) 677 Ellis empty plot
(1) 664 Larkin empty plot
(1) 556 Larkin with stump
(4) 555 Larkin (3) on Larkin side of the property
(1) on Turk side of the property
(1) 447-451 Turk empty plot
(1) 358 Golden Gate empty plot
(2) 250 McAllister 2 empty plots
(7) 200 Larkin 2 empty plots on McAllister side of property
5 empty plots on Fulton side of property
(1) 100 Larkin 1 empty plot on Grove side property next to Hyde
(1) 248 Golden Gate empty plot
(1) 101 Hyde empty plot
(2) 155 Hyde empty plots
(5) 50 UN Plaza 5 empty plots in plaza next to Hyde street
(1) 381 Turk empty plot
(2) 259 Hyde 2 empty plots on Eddy side of property
(1) 455 Eddy with stump
(1) 555 Ellis empty plot
(1) 570 Ellis empty plot
(1) 707 O'Farrell empty plot
(1) 656 O'Farrell empty plot
(1) 626 O'Farrell with stump
(1) 825 Geary empty plot
(2) 765 Geary 1 dying tree in plot
(1) 747 Geary 1 dying tree in plot
(1) 735 Geary 1 dying tree in plot
(1) 667-669 Geary empty plot
(1) 550 Leavenworth empty plot
(1) 540 O'Farrell empty plot
(1) 525 O'Farrell empty plot
(2) 545 O'Farrell 1 empty plot
1 with stump
(1) 434 Leavenworth empty plot
(3) 480 Ellis (2) empty plots on Ellis
(1) empty plot on Leavenworth side of property
(1) 391 Leavenworth empty plot
(2) 345 Leavenworth empty plots
(1) 335 Leavenworth empty plot
(1) 240 Leavenworth empty plot with 3 poles and bag
(1) 222 Leavenworth empty plot
(1) 237 Leavenworth tree cut in half
(1) 294 Turk on Leavenworth side of property with stump

(1) 240 Turk empty plot
(5) 201 Turk Five empty plots
(1) 275 Turk empty plot
(1) 191 Golden Gate on Leavenworth side of property with 3 poles
(1) 86 Mc Allister plot with stump
(1) 50 Jones empty plot
(2) 121 Golden Gate on Jones side of property empty plots
(1) 180 Jones no tree 4 poles, 4 braces and screen in plot
(1) 265 Eddy empty plot
(4) 246 Eddy 1 empty plot on Eddy
(2) stumps on Jones side of property
(1) empty plot on Ellis side of property
(1) 230 Eddy on Jones side of property with stump
(1) 345 Jones empty plot with pole
(1) 387 Ellis with 2 foot wide stump
(1) 201 Ellis with 2 poles
(1) 424 Jones empty plot
(3) 450 Jones 3 empty plots
(2) 516 O'Farrell 1 empty plot
1 with 2poles & bag
(1) 520 Jones 1 planter box empty
(1) 532 Jones empty plot with 2 poles
(1) 540 Jones empty plot with 1 pole
(1) 545 Jones empty plot
(1) 634 Geary empty plot
(2) 333 Taylor pot with 3 poles, braces and screen
1 plot with stump
(1) 231 Ellis empty plot
(1) 222 Taylor empty plot with stump & 3 poles
(1) 960 Market on Turk side of property with stump, 3 poles & braces
(1) 55 Mason empty plot
(2) 1129 Market empty plots
(1) 1236 Market empty plot
(1) 1240 Market empty plot

Total trees survey 168 in 117 different locations
North of Market is Van Ness to Geary to Market
Total of 70 square blocks covered

THE ABOVE SURVEY IS THE PROPERTY OF:
TENDERLOIN TREE COMMITTEE

From:	Andrew Ogus
To:	CPC-Commissions Secretary; Carroll, John (BOS); Melgar, Myrna (BOS); Chen, Chyanne (BOS); Mahmood, Bilal (BOS); ChenStaff; MelgarStaff (BOS); MahmoodStaff; Gluckstein, Lisa (CPC); Lozano, Jesus (ENV); DPW, Urbanforestry (DPW); Short, Carla (DPW); Moore, David (DPW)
Subject:	Fwd: Automatic reply: Amend File 251211: Stop the Unregulated In-Lieu Fee Expansion
Date:	Thursday, April 9, 2026 8:32:11 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Members of the Land Use Committee, Planning Commission, and Urban Forestry Council,

I am writing to oppose the street tree legislation in Board File 251211.

Allowing developers to pay a $2,590 fee instead of planting a street tree is a gift to the real estate industry. Developers will choose the fee over navigating the City's planting requirements. The City must focus on streamlining the permitting process rather than allowing developers to buy their way out of providing essential green infrastructure.

This legislation is being sold under a false equity narrative. The legislative digest claims these pooled fees will go to "low-canopy areas." The actual text of the ordinance deposits these fees into the general Adopt-A-Tree Fund with no geographic spending restrictions. Without a statutory requirement to spend these funds in designated Environmental Justice communities, this expansion creates an unregulated slush fund.

Public Works cannot manage its existing in-lieu fees. In February 2023, the department collected $242,000 from UCSF to plant 105 replacement trees. Exactly zero have been planted so far. The department is not even using the funds they have right now. Furthermore, the department administratively canceled over 900 active 311 requests for tree replacement in empty sidewalk basins in December 2025.

The legislation also eliminates the public right to appeal "hazard" tree removals without defining what constitutes a hazard. This allows the City to label any inconvenient tree as hazardous to fast-track its removal without public oversight.

The City must reject this proposal entirely or substantially amend it. Any amendment must raise the fee to reflect the true cost of planting and maintaining a tree. It must strictly dictate where the funds are spent using clear definitions for "high environmental justice burden" and "low canopy." Finally, it must preserve the public's right to appeal tree removals and mandate transparency for hazard designations.

Sincerely,

Andrew Ogus
Inner Sunset

From: tenderloin treecampaign
To: Board of Supervisors (BOS)
Cc: Carroll, John (BOS)
Subject: Strong Opposition to File No. 251211
Date: Thursday, April 9, 2026 5:00:59 PM
Attachments: WESTERN ADDITION and Hayes Valley Survey April 2026.docx
Tenderloin Tree Survey March 25, 2026.docx

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Board of Supervisors, City and County of San Francisco
Land Use and Transportation Committee
c/o Clerk of the Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
Email: clerk.boardofsupervisors@sfgov.org

Re: Strong Opposition to File No. 251211

Ordinance Amending Public Works, Administrative, and Planning Codes Regarding Street Trees (Eliminating Public Appeals for City-Initiated Tree Removals and Related Changes)

Submitted by: [Tenderloin Tree Campaign/ Advocate, Board of Supervisors District 5 (Tenderloin, Hayes Valley and Western Addition)

Date: April 9, 2026

(Tenderlion Tree Campaign attach your District 5 Empty Street Tree Plot List as supporting documentation)

The message calls on San Franciscans to act now to safeguard the city's urban forest. It opposes upcoming legislation that would let developers pay a fee instead of planting trees, weaken public appeals of "hazard" tree removals, and shorten the time window for citizens to contest city-initiated tree cuts. The key concerns are:

Developer incentives: Allowing a cash-in-lieu option will likely lead to fewer trees, as developers view planting as a hassle.
Hazard-tree transparency: Removing the public's right to appeal "hazard" designations could be abused without strong oversight and clear, consistent criteria.
Public participation: Compressing appeal timelines for city-driven removals limits residents' ability to gather information and mount effective defenses for trees.

The overall plea is to preserve tree planting requirements, maintain robust public oversight, and ensure that San Francisco's dwindling canopy is protected—especially given the city's climate-emergency commitments.

Tenderloin/North of Market Tree Survey

March 26, 2026

(2) 101 Polk on Dr. Tom Weddell Place side property with stumps

(1) 99 Grove empty plot

(3) 300 Van Ness & Grove tree plot bed total 6 trees missing

(3) 300 Van Ness & McAllister tree plot bed total 6 trees missing

(1) 525 Golden Gate empty plot

(1) 590 Van Ness empty plot

(1) 555 Polk empty plot

(1) 650 Turk Street empty plot

(2) 750 Van Ness empty plots

(1) 747 Eddy empty plot

(1) 700 Eddy empty plot

(1) 640 Polk empty plot

(1) 620 Polk empty plot

(1) 610 Polk empty plot

(1) 691 Eddy empty plot

(1) 665 Eddy empty plot

(2) Eddy 1 empty plot

1 with stump in plot

(1) 700 Eddy on Polk side of property empty plot

(2) 731 Polk on Willow side of property empty plots

(1) 726 Polk on Ellis side of property empty plot

(1) 759-763 Ellis plot with stump

(1) 741Ellis empty plot

(1) 707 Ellis empty plot

(1) 869 Ellis empty plot

(1) 840 Van Ness empty plot

(2) 818 Van Ness empty plots on Willow side of property

(4) 750 Eddy on Willow side of property four empty plots

(3) 1000 Van Ness 1 empty plot

2 empty plots on Myrtle side of property

(1) 1040 Geary empty plot with stump

(2) 1029 Geary empty plots

(2) 999 Geary empty plots on Myrtle side of property

(3) 990 Geary 3 empty plots on Myrtle side of property

(1) 825 Larkin empty plot

(1) 909 Geary empty plot on Larkin side of property

(1) 925 Geary empty plot

(2) 965 Geary 2 empty plots

(1) 750 O'Farrell empty plot

(2) 730 Larkin 2 empty plots

(1) 655 Ellis empty plot

(1) 835 Larkin empty plot

(1) 909 Geary empty plot on Larkin side of property

(1) 925 Geary empty plot

(2) 965 Geary empty plots

(1) 677 Ellis empty plot

(1) 664 Larkin empty plot

(1) 556 Larkin with stump

(4) 555 Larkin (3) on Larkin side of the property

(1) on Turk side of the property

(1) 447-451 Turk empty plot

(1) 358 Golden Gate empty plot

(2) 250 McAllister 2 empty plots

(7) 200 Larkin 2 empty plots on McAllister side of property

5 empty plots on Fulton side of property

(1) 100 Larkin 1 empty plot on Grove side property next to Hyde

(1) 248 Golden Gate empty plot

(1) 101 Hyde empty plot

(2) 155 Hyde empty plots

(5) 50 UN Plaza 5 empty plots in plaza next to Hyde street

(1) 381 Turk empty plot

(2) 259 Hyde 2 empty plots on Eddy side of property

(1) 455 Eddy with stump

(1) 555 Ellis empty plot

(1) 570 Ellis empty plot

(1) 707 O'Farrell empty plot

(1) 656 O'Farrell empty plot

(1) 626 O'Farrell with stump

(1) 825 Geary empty plot

(2) 765 Geary 1 dying tree in plot

(1) 747 Geary 1 dying tree in plot

(1) 735 Geary 1 dying tree in plot

(1) 667-669 Geary empty plot

(1) 550 Leavenworth empty plot

(1) 540 O'Farrell empty plot
(1) 525 O'Farrell empty plot
(2) 545 O'Farrell 1 empty plot
1 with stump
(1) 434 Leavenworth empty plot
(3) 480 Ellis (2) empty plots on Ellis
(1) empty plot on Leavenworth side of property
(1) 391 Leavenworth empty plot
(2) 345 Leavenworth empty plots
(1) 335 Leavenworth empty plot
(1) 240 Leavenworth empty plot with 3 poles and bag
(1) 222 Leavenworth empty plot
(1) 237 Leavenworth tree cut in half
(1) 294 Turk on Leavenworth side of property with stump
(1) 240 Turk empty plot
(5) 201 Turk Five empty plots
(1) 275 Turk empty plot
(1) 191 Golden Gate on Leavenworth side of property with 3 poles
(1) 86 Mc Allister plot with stump
(1) 50 Jones empty plot
(2) 121 Golden Gate on Jones side of property empty plots
(1) 180 Jones no tree 4 poles, 4 braces and screen in plot
(1) 265 Eddy empty plot
(4) 246 Eddy 1 empty plot on Eddy
2. stumps on Jones side of property
(1) empty plot on Ellis side of property
(1) 230 Eddy on Jones side of property with stump
(1) 345 Jones empty plot with pole
(1) 387 Ellis with 2 foot wide stump
(1) 201 Ellis with 2 poles
(1) 424 Jones empty plot
(3) 450 Jones 3 empty plots
(2) 516 O'Farrell 1 empty plot
1 with two poles & bag
(1) 520 Jones 1 planter box empty
(1) 532 Jones empty plot with 2 poles
(1) 540 Jones empty plot with 1 pole
(1) 545 Jones empty plot
(1) 634 Geary empty plot
(2) 333 Taylor pot with 3 poles, braces and screen
1 plot with stump
(1) 231 Ellis empty plot
(1) 222 Taylor empty plot with stump & 3 poles
(1) 960 Market on Turk side of property with stump, 3 poles & braces
(1) 55 Mason empty plot
(2) 1129 Market empty plots
(1) 1236 Market empty plot
(1) 1240 Market empty plot

Total trees survey 168 in 117 different locations
North of Market is Van Ness to Geary to Market
Total of 70 square blocks covered
THE ABOVE SURVEY IS THE PROPERTY OF:
TENDERLOIN TREE COMMITTEE

WESTERN ADDITION & HAYES VALLEY
APRIL 2026

(1) 58 Octavia empty plot
(1) 188 Octavia two + empty planting area
(6) 55 Page 6 boxes no trees
(1) 20 Page empty plot
(1) 10 Page empty plot
(2) 129-150 Oak on Lily side of property one with stump
(1) 129-150 Oak empty plot
(2) 96 Franklin two empty plots on Oak side of the property
(3) 50 Oak three empty plots on Hickory side of the property
(1) 141 Fell empty plot
(1) 141-155 Fell empty plot
+ 100 Van Ness empty planting beds
35 Van Ness 8 empty beds
One empty plot on Fell side of the property
One empty plot on Van Ness
(3) 401 Van Ness three empty plots on Hayes side of the property
(2) 333 Franklin one empty plot and one on Linden side of the property
(1) 201 Hayes plot with stump on Linden side of the property
(1) 250 Hayes empty plot
(2) 280 Fell empty plots on the Linden side of the property
(5+) 300-321 Linden five empty beds one empty tree plot
(2) 400 Octavia two empty plots
(1) 377-385 Hayes plot with stump
(1) 364 Hayes empty plot
(1) 233 Franklin empty plot on Hayes side of the property
4+ 201 Van Ness one empty plot and three empty planting beds
(1) 301 Van Ness missing tree
(2) 461 Van Ness two missing trees
(4) 555 Franklin empty plot and three empty plots on Fulton side of the property
(1)365 Fulton empty plot
(1) 520 Grove empty plot
(1) 363-365 Grove empty plot
(1) 467 Grove empty plot
(1) 425 Grove with stump
(1) 450 Fulton empty plot
(1) 742 McAllister with stump
(2) 756 McAllister missing trees on each side of the walkway entrance
(2) 768 McAllister missing trees on each side of the walkway entrance
(1) 785 McAllister empty plot
(2) 808 McAllister missing trees on each side of the walkway entrance
(1) 860 McAllister with stump
(1) 870 McAllister empty plot
(1) 900 McAllister on Laguna side of the property empty plot

(1) 887 McAllister across the street with stump

(5) 500 Van Ness five empty planting beds

(2) 701 Van Ness empty plot and empty plot on Turk side of the property

(1) 745 Franklin empty plot

(2) 801 Turk empty plot and empty plot on Elm side of the property

(1) 835 Turk empty plot

+ 900 Turk no trees next to fence and empty plot next to the soccer field

(24) 1040 Eddy empty plots inside field

(1) 1010 Eddy empty plot on Gough side of the property

(2) 990 Eddy two empty plots on Gough side of the property

(1) 920 Eddy plot with stump

(1) 923 Eddy empty plot

(3) 909 Franklin one with stump

Two on Eddy side of the property 1 with stump

(6) 885 Franklin six empty plots

(3) 807 Franklin three empty plots

(4) 799 Van Ness three empty plots on Larch side of the property

Stump on Van Ness

(1) 819 Van Ness empty plot

(1) 851 Van Ness empty plot

(1) 939 Ellis empty plot on Willow side of the property

(2) 950 Franklin on Willow side of the property one with stump

(1) 860 Eddy empty plot

(5) 1000 Franklin five empty plots

(1) 231 Olive empty plot

(2) 999 Van Ness two empty plots on Olive side of the property

(3) 1031 Franklin three empty plots

(2) 1100 Gough empty plot and Ellis side of the property empty plot

(1) 1100 Ellis on Gough side of the property empty plot

(1) 1250 Laguna empty plot on the Ellis side of the property

(10) 45-85 Cleary 7 Stumps in planting areas and 1 empty plot

Two empty plots on Ellis side of the property

(2) 1335 Laguna two empty plots

(1) 1315 Laguna empty plot

(3) 1355 Laguna three empty plots

(1) Quick stop Lane empty plot

(2) 621 Willow empty plot and one across the street

(1) 651-655 Willow empty plot

(1) 1398 Buchanan empty plot

(1) 1300 Buchanan with stump

(1) 1295 Eddy empty plot

(2) 1258-1288 Buchanan empty plot and empty plot on Eddy side of the property

(1) 1355 Eddy empty plot

(3) 1170 Webster three empty plots on Eddy side of the property

(3) 1280 Webster two empty plots and one on Ellis side of the property

(1) 1519-1523 O'Farrell stump in plot

(1) Zump Lane on Geary empty plot

(1) Lottie Bernnice on Geary empty plot

(1) 1465 Laguna empty plot

(1) 1435 Laguna empty plot

(1) 1450 Laguna empty plot

(1) 1570 Post with stump

(1) 1776 Sutter loop of trunk

(1) 1750 Sutter empty plot

(1) 1729-1731 Sutter empty plot

(2) 1691 Laguna two empty plots

(2) 1649-1653 Laguna two empty plots

(1) 1700 Laguna on Sutter side of the property empty plot

(1) 1755 Sutter with stump

(1) 1700 Sutter empty plot

(1) 1825 Post empty plot on Webster side of the property

(2) 1881 Post on Fillmore side of the property one with stump

(1) 1637 Fillmore with stump

+ 1600 Webster medium missing trees

(1) 1747 Buchanan on Sutter side of the property empty plot

(1) 1826 Buchanan empty plot

(2) 1868 Buchanan two empty plots on Bush side of the property

(1) 1825 Bush empty plot

(1) 1615 Sutter empty plot

(1) 1719 Bush empty plot

(1) 1760 Bush empty plot

(1) 1715 Octavia empty plot

(1) 195301957 Pine with stump

(1) 1861-1863 Laguna empty plot on Pine side of the property

(1) 2003 Pine empty plot

(1) 2158 Pine empty plot

(1) 2189 Pine empty plot

(2) 2205 Pine two empty plots

(2) 2109-2111 Bush two empty plots

(1) 1899 Fillmore on Bush side of the property empty plot

(2) 1880 Fillmore two empty plots on Bush side of the property

(1) 1856 Fillmore empty plot

(2) 1669 Fillmore one plot with stump

(1) 1560 Fillmore on Geary side of the property empty plot

(1) 1555 Fillmore empty plot

(10+) 1330 Fillmore on Ellis side of the property empty tree beds

(2) 1310 Fillmore two empty plots

(1) 1260 Fillmore empty plot

(1) 1240 Fillmore empty plot

(1) 1201 Fillmore empty plot

(2) 1150 Fillmore two empty plots

(1) 1125 Fillmore empty plot

(4) 1100 Fillmore empty plot

Three empty plots on Golden Gate side of the property

(1) 1117 Fillmore empty plot

(2) 1540 McAllister two empty plots

(1) 1025 Fillmore with stump

(1) 889 Fulton empty plot

(1) 875 Fulton empty plot

(2) on Friendship Alley on either side of the Alley front empty plots

(1) 805 Webster empty plot

+ Webster between Fulton and Grove medium need more trees and stump

(1) 600 Webster plot need tree

(3) 645 Hayes empty plot two empty plots on Buchanan side of the property

(4) 602-618 Buchanan four empty planter beds

(1) 477 Hickory empty plot

(1) 471 Hickory empty plot

(1) 500 Buchanan on Oak side of the property empty plot

(1) 501 Oak with stump

(2) 370 Page two empty plots

(2) 364 Page two empty plots

(1) 300 Buchanan empty plot

(1) 295 Buchanan empty plot on Haight side of the property

(2) 200 Buchanan two empty plots

(2) 2175 Market one with stump

1 empty plot with 2 poles

(1) 2109 Market in medium stump of palm tree

(1) 2101 Market on Church side of the property empty plot

(1) 2059 Market on 14th Street side of the property empty plot

(1) 2027 Market empty plot

(1) 1800 Market on Waller side of the property 1 brunt dead tree

(1) 80 Octavia on Market street side of the property empty plot

(1) 1844 Market Street empty plot

(2) 52 Waller two stumps

(1) 60 Waller one stump

(1) 74 Waller empty plot

(1) 86 Waller with stump

(1) 41 Waller empty plot

(1) 67 Waller empty plot

(1) 155 Haight empty plot

(3) 100 Laguna three dead trees

(1) 137 Haight empty plot

(1) 115 Haight empty plot

(3) 180-188 Haight three beds without trees

(1) 214 Haight empty plot

(1) 218 Haight empty plot

(1) 333 Haight empty plot

(2) 379-381 Haight empty plot

(1) 325 Haight empty plot

(1) 358-360 Haight empty plot

(1) 135 Webster empty plot

+ 222 Webster on side of the property no trees

(1) 430-432 Page 1 dead tree

(1) 507 Haight empty plot

(1) 535 Haight empty plot

(3) 237 Luaussat three empty plots

(1) 59-61 Germania empty plot

(3) 47 Germania three empty barrels

(1) 119 Fillmore on Germania side of the property with stump

(1) 115 Germania empty plot

(1) 212 Steiner empty plot

(1) 728 Page 1 dead tree with 3 poles, 3 braces and bag

(1) 267 Pierce no tree

(1) 627 Waller not tree

(3) 100 Scott three no trees

(1) 254 Divisadero empty plot

(1) 272 Divisadero empty plot

(1) 286 Divisadero empty plot

(1) 955 Page with stump

(1) 949 Page with stump

(1) 940 Page empty plot

(1) 301 Scott empty plot

(2) 799 Oak two empty plots on Scott side of the property

(1) 987 Oak empty plot

(1) 1001 Oak with stump

(1) 1025 Oak empty plot

(1) 44 Divisadero with stump

(1) 1175 Fell on Divisadero side of the property with stump

(1) 1129 Fell empty plot

(1) 486 Scott on Fillmore side of the property with stump

(1) 465 Scott empty plot

(1) 460 Scott empty plot on Fell side of the property

(1) 520 Scott empty plot

(3) 556-560 Hayes three plots no trees

(1) 1250 Hayes empty plot

(1) 1282 Hayes two empty plots

(1) 650 Divisadero on Grove side of the property loop of stem

(1) 1250 Grove empty plot

(1) 1234 Grove no tree in plot

(1) 701 Scott on Grove side of the property empty plot

(1) 1280 Fulton empty plot

(1) 810 Divisadero empty plot

+ between Fell and McAllister on medium on Divisadero missing trees

(1) 1451 McAllister empty plot

(1) 1592 McAllister empty plot

(1) 1111 Scott on Turk side of the property with stump

(1) 2 Seymour St empty plot

(1) 1042 Divisadero empty plot

(1) 1012 Divisadero empty plot

(1) 1101 Divisadero empty plot

(1) 1207 Divisadero empty plot

(1) 1828 Eddy empty plot

(1) 1865-1875 Eddy empty plot

(1) 1171 Scott with stump

(1) 1150 Scott empty plot

(1) 1177 Pierce empty plot

(3) 1835 Ellis two empty plots on Pierce side of the property

One across the street empty plot

(3) 1201-1299 Pierce empty plot, with stump and one with stump

(4) 1801 Ellis three stumps and on empty plot

(1) 1940 Ellis empty pot on Buchanan side of the property

(1) 1450 Divisadero empty plot

(1) 2141 Geary with stump

+ Geary medium between Divisadero and Scott missing trees

(1) 1426 Steiner empty plot

(1) 1795 O'Farrell empty plot

(2) 1430 Scott two empty plots on Geary side of the property

(1) 1440 Turk empty plot on Steiner side of the property

(2) 1399 Golden Gate empty plot and one with stump

(1) 1025 Steiner with stump

(1) 949 Steiner with stump

(1) 911-913 Steiner empty plot

(1) 722 Steiner on Grove side of the property empty plot

(2) 1099 Hayes on Pierce side of the property with stumps

(2) 1000 Fell two empty plots

(1) 590 Steiner empty plot

(1) 510 Steiner on Oak side of the property empty plot

(1) 579 Haight box without a tree

(1) 569 Haight empty plot

(1) 533 Haight empty plot

THE ABOVE SURVEY IS THE PROPERTY OF
TENDERLOIN TREE COMMITTEE

Mr. John Nulty co-chair
Tenderloin Tree Campaign
P. O. Box 421949
San Francisco, CA 94142-1949
https://url.avanan.click/v2/r01/__http://tenderlointreecampaign.blogspot.com/___.YXAzOnNmZHQyOmE6bzpmN2UzYzU5Y2E1YWNmMTBmMmRjNDhhMTMwZjBlZjRmNTo3OjFkMWU6NWNjYWE4NGU2OGZmMDk5MTE0NjFhM2I4NmFiZTdiZWFhM2M2YTIwMDExMjcxYmEzNTM4ZDZhMWIwOGNmZmMyMDp0OlQ6Tg

WESTERN ADDITION & HAYES VALLEY
APRIL 2026

(1) 58 Octavia empty plot
(1) 188 Octavia two + empty planting area
(6) 55 Page 6 boxes no trees
(1) 20 Page empty plot
(1) 10 Page empty plot
(2) 129-150 Oak on Lily side of property one with stump
(1) 129-150 Oak empty plot
(2) 96 Franklin two empty plots on Oak side of the property
(3) 50 Oak three empty plots on Hickory side of the property
(1) 141 Fell empty plot
(1) 141-155 Fell empty plot
+ 100 Van Ness empty planting beds
35 Van Ness 8 empty beds
One empty plot on Fell side of the property
One empty plot on Van Ness
(3) 401 Van Ness three empty plots on Hayes side of the property
(2) 333 Franklin one empty plot and one on Linden side of the property
(1) 201 Hayes plot with stump on Linden side of the property
(1) 250 Hayes empty plot
(2) 280 Fell empty plots on the Linden side of the property
(5+) 300-321 Linden five empty beds one empty tree plot
(2) 400 Octavia two empty plots
(1) 377-385 Hayes plot with stump
(1) 364 Hayes empty plot
(1) 233 Franklin empty plot on Hayes side of the property
4+ 201 Van Ness one empty plot and three empty planting beds
(1) 301 Van Ness missing tree
(2) 461 Van Ness two missing trees
(4) 555 Franklin empty plot and three empty plots on Fulton side of the property
(1)365 Fulton empty plot
(1) 520 Grove empty plot
(1) 363-365 Grove empty plot
(1) 467 Grove empty plot
(1) 425 Grove with stump
(1) 450 Fulton empty plot
(1) 742 McAllister with stump
(2) 756 McAllister missing trees on each side of the walkway entrance
(2) 768 McAllister missing trees on each side of the walkway entrance
(1) 785 McAllister empty plot
(2) 808 McAllister missing trees on each side of the walkway entrance
(1) 860 McAllister with stump
(1) 870 McAllister empty plot

(1) 900 McAllister on Laguna side of the property empty plot
(1) 887 McAllister across the street with stump
(5) 500 Van Ness five empty planting beds
(2) 701 Van Ness empty plot and empty plot on Turk side of the property
(1) 745 Franklin empty plot
(2) 801 Turk empty plot and empty plot on Elm side of the property
(1) 835 Turk empty plot
+ 900 Turk no trees next to fence and empty plot next to the soccer field
(24) 1040 Eddy empty plots inside field
(1) 1010 Eddy empty plot on Gough side of the property
(2) 990 Eddy two empty plots on Gough side of the property
(1) 920 Eddy plot with stump
(1) 923 Eddy empty plot
(3) 909 Franklin one with stump
Two on Eddy side of the property 1 with stump
(6) 885 Franklin six empty plots
(3) 807 Franklin three empty plots
(4) 799 Van Ness three empty plots on Larch side of the property
Stump on Van Ness
(1) 819 Van Ness empty plot
(1) 851 Van Ness empty plot
(1) 939 Ellis empty plot on Willow side of the property
(2) 950 Franklin on Willow side of the property one with stump
(1) 860 Eddy empty plot
(5) 1000 Franklin five empty plots
(1) 231 Olive empty plot
(2) 999 Van Ness two empty plots on Olive side of the property
(3) 1031 Franklin three empty plots
(2) 1100 Gough empty plot and Ellis side of the property empty plot
(1) 1100 Ellis on Gough side of the property empty plot
(1) 1250 Laguna empty plot on the Ellis side of the property
(10) 45-85 Cleary 7 Stumps in planting areas and 1 empty plot
Two empty plots on Ellis side of the property
(2) 1335 Laguna two empty plots
(1) 1315 Laguna empty plot
(3) 1355 Laguna three empty plots
(1) Quick stop Lane empty plot
(2) 621 Willow empty plot and one across the street
(1) 651-655 Willow empty plot
(1) 1398 Buchanan empty plot
(1) 1300 Buchanan with stump
(1) 1295 Eddy empty plot
(2) 1258-1288 Buchanan empty plot and empty plot on Eddy side of the property
(1) 1355 Eddy empty plot
(3) 1170 Webster three empty plots on Eddy side of the property
(3) 1280 Webster two empty plots and one on Ellis side of the property

(1) 1519-1523 O'Farrell stump in plot
(1) Zump Lane on Geary empty plot
(1) Lottie Bernnice on Geary empty plot
(1) 1465 Laguna empty plot
(1) 1435 Laguna empty plot
(1) 1450 Laguna empty plot
(1) 1570 Post with stump
(1) 1776 Sutter loop of trunk
(1) 1750 Sutter empty plot
(1) 1729-1731 Sutter empty plot
(2) 1691 Laguna two empty plots
(2) 1649-1653 Laguna two empty plots
(1) 1700 Laguna on Sutter side of the property empty plot
(1) 1755 Sutter with stump
(1) 1700 Sutter empty plot
(1) 1825 Post empty plot on Webster side of the property
(2) 1881 Post on Fillmore side of the property one with stump
(1) 1637 Fillmore with stump
+ 1600 Webster medium missing trees
(1) 1747 Buchanan on Sutter side of the property empty plot
(1) 1826 Buchanan empty plot
(2) 1868 Buchanan two empty plots on Bush side of the property
(1) 1825 Bush empty plot
(1) 1615 Sutter empty plot
(1) 1719 Bush empty plot
(1) 1760 Bush empty plot
(1) 1715 Octavia empty plot
(1) 195301957 Pine with stump
(1) 1861-1863 Laguna empty plot on Pine side of the property
(1) 2003 Pine empty plot
(1) 2158 Pine empty plot
(1) 2189 Pine empty plot
(2) 2205 Pine two empty plots
(2) 2109-2111 Bush two empty plots
(1) 1899 Fillmore on Bush side of the property empty plot
(2) 1880 Fillmore two empty plots on Bush side of the property
(1) 1856 Fillmore empty plot
(2) 1669 Fillmore one plot with stump
(1) 1560 Fillmore on Geary side of the property empty plot
(1) 1555 Fillmore empty plot
(10+) 1330 Fillmore on Ellis side of the property empty tree beds
(2) 1310 Fillmore two empty plots
(1) 1260 Fillmore empty plot
(1) 1240 Fillmore empty plot
(1) 1201 Fillmore empty plot
(2) 1150 Fillmore two empty plots

(1) 1125 Fillmore empty plot
(4) 1100 Fillmore empty plot
Three empty plots on Golden Gate side of the property
(1) 1117 Fillmore empty plot
(2) 1540 McAllister two empty plots
(1) 1025 Fillmore with stump
(1) 889 Fulton empty plot
(1) 875 Fulton empty plot
(2) on Friendship Alley on either side of the Alley front empty plots
(1) 805 Webster empty plot
+ Webster between Fulton and Grove medium need more trees and stump
(1) 600 Webster plot need tree
(3) 645 Hayes empty plot two empty plots on Buchanan side of the property
(4) 602-618 Buchanan four empty planter beds
(1) 477 Hickory empty plot
(1) 471 Hickory empty plot
(1) 500 Buchanan on Oak side of the property empty plot
(1) 501 Oak with stump
(2) 370 Page two empty plots
(2) 364 Page two empty plots
(1) 300 Buchanan empty plot
(1) 295 Buchanan empty plot on Haight side of the property
(2) 200 Buchanan two empty plots
(2) 2175 Market one with stump
1 empty plot with 2 poles
(1) 2109 Market in medium stump of palm tree
(1) 2101 Market on Church side of the property empty plot
(1) 2059 Market on 14th Street side of the property empty plot
(1) 2027 Market empty plot
(1) 1800 Market on Waller side of the property 1 brunt dead tree
(1) 80 Octavia on Market street side of the property empty plot
(1) 1844 Market Street empty plot
(2) 52 Waller two stumps
(1) 60 Waller one stump
(1) 74 Waller empty plot
(1) 86 Waller with stump
(1) 41 Waller empty plot
(1) 67 Waller empty plot
(1) 155 Haight empty plot
(3) 100 Laguna three dead trees
(1) 137 Haight empty plot
(1) 115 Haight empty plot
(3) 180-188 Haight three beds without trees
(1) 214 Haight empty plot
(1) 218 Haight empty plot
(1) 333 Haight empty plot

(2) 379-381 Haight empty plot
(1) 325 Haight empty plot
(1) 358-360 Haight empty plot
(1) 135 Webster empty plot
+ 222 Webster on side of the property no trees
(1) 430-432 Page 1 dead tree
(1) 507 Haight empty plot
(1) 535 Haight empty plot
(3) 237 Luaussat three empty plots
(1) 59-61 Germania empty plot
(3) 47 Germania three empty barrels
(1) 119 Fillmore on Germania side of the property with stump
(1) 115 Germania empty plot
(1) 212 Steiner empty plot
(1) 728 Page 1 dead tree with 3 poles, 3 braces and bag
(1) 267 Pierce no tree
(1) 627 Waller not tree
(3) 100 Scott three no trees
(1) 254 Divisadero empty plot
(1) 272 Divisadero empty plot
(1) 286 Divisadero empty plot
(1) 955 Page with stump
(1) 949 Page with stump
(1) 940 Page empty plot
(1) 301 Scott empty plot
(2) 799 Oak two empty plots on Scott side of the property
(1) 987 Oak empty plot
(1) 1001 Oak with stump
(1) 1025 Oak empty plot
(1) 44 Divisadero with stump
(1) 1175 Fell on Divisadero side of the property with stump
(1) 1129 Fell empty plot
(1) 486 Scott on Fillmore side of the property with stump
(1) 465 Scott empty plot
(1) 460 Scott empty plot on Fell side of the property
(1) 520 Scott empty plot
(3) 556-560 Hayes three plots no trees
(1) 1250 Hayes empty plot
(1) 1282 Hayes two empty plots
(1) 650 Divisadero on Grove side of the property loop of stem
(1) 1250 Grove empty plot
(1) 1234 Grove no tree in plot
(1) 701 Scott on Grove side of the property empty plot
(1) 1280 Fulton empty plot
(1) 810 Divisadero empty plot
+ between Fell and McAllister on medium on Divisadero missing trees

(1) 1451 McAllister empty plot
(1) 1592 McAllister empty plot
(1) 1111 Scott on Turk side of the property with stump
(1) 2 Seymour St empty plot
(1) 1042 Divisadero empty plot
(1) 1012 Divisadero empty plot
(1) 1101 Divisadero empty plot
(1) 1207 Divisadero empty plot
(1) 1828 Eddy empty plot
(1) 1865-1875 Eddy empty plot
(1) 1171 Scott with stump
(1) 1150 Scott empty plot
(1) 1177 Pierce empty plot
(3) 1835 Ellis two empty plots on Pierce side of the property
One across the street empty plot
(3) 1201-1299 Pierce empty plot, with stump and one with stump
(4) 1801 Ellis three stumps and on empty plot
(1) 1940 Ellis empty pot on Buchanan side of the property
(1) 1450 Divisadero empty plot
(1) 2141 Geary with stump
+ Geary medium between Divisadero and Scott missing trees
(1) 1426 Steiner empty plot
(1) 1795 O'Farrell empty plot
(2) 1430 Scott two empty plots on Geary side of the property
(1) 1440 Turk empty plot on Steiner side of the property
(2) 1399 Golden Gate empty plot and one with stump
(1) 1025 Steiner with stump
(1) 949 Steiner with stump
(1) 911-913 Steiner empty plot
(1) 722 Steiner on Grove side of the property empty plot
(2) 1099 Hayes on Pierce side of the property with stumps
(2) 1000 Fell two empty plots
(1) 590 Steiner empty plot
(1) 510 Steiner on Oak side of the property empty plot
(1) 579 Haight box without a tree
(1) 569 Haight empty plot
(1) 533 Haight empty plot

THE ABOVE SURVEY IS THE PROPERTY OF
TENDERLOIN TREE COMMITTEE

Tenderloin/North of Market Tree Survey
March 26, 2026

(2) 101 Polk on Dr. Tom Weddell Place side property with stumps
(1) 99 Grove empty plot
(3) 300 Van Ness & Grove tree plot bed total 6 trees missing
(3) 300 Van Ness & McAllister tree plot bed total 6 trees missing
(1) 525 Golden Gate empty plot
(1) 590 Van Ness empty plot
(1) 555 Polk empty plot
(1) 650 Turk Street empty plot
(2) 750 Van Ness empty plots
(1) 747 Eddy empty plot
(1) 700 Eddy empty plot
(1) 640 Polk empty plot
(1) 620 Polk empty plot
(1) 610 Polk empty plot
(1) 691 Eddy empty plot
(1) 665 Eddy empty plot
(2) Eddy 1 empty plot
1 with stump in plot
(1) 700 Eddy on Polk side of property empty plot
(2) 731 Polk on Willow side of property empty plots
(1) 726 Polk on Ellis side of property empty plot
(1) 759-763 Ellis plot with stump
(1) 741Ellis empty plot
(1) 707 Ellis empty plot
(1) 869 Ellis empty plot
(1) 840 Van Ness empty plot
(2) 818 Van Ness empty plots on Willow side of property
(4) 750 Eddy on Willow side of property four empty plots
(3) 1000 Van Ness 1 empty plot
2 empty plots on Myrtle side of property
(1) 1040 Geary empty plot with stump
(2) 1029 Geary empty plots
(2) 999 Geary empty plots on Myrtle side of property
(3) 990 Geary 3 empty plots on Myrtle side of property
(1) 825 Larkin empty plot
(1) 909 Geary empty plot on Larkin side of property
(1) 925 Geary empty plot
(2) 965 Geary 2 empty plots
(1) 750 O'Farrell empty plot
(2) 730 Larkin 2 empty plots
(1) 655 Ellis empty plot
(1) 835 Larkin empty plot

(1) 909 Geary empty plot on Larkin side of property
(1) 925 Geary empty plot
(2) 965 Geary empty plots
(1) 677 Ellis empty plot
(1) 664 Larkin empty plot
(1) 556 Larkin with stump
(4) 555 Larkin (3) on Larkin side of the property
(1) on Turk side of the property
(1) 447-451 Turk empty plot
(1) 358 Golden Gate empty plot
(2) 250 McAllister 2 empty plots
(7) 200 Larkin 2 empty plots on McAllister side of property
5 empty plots on Fulton side of property
(1) 100 Larkin 1 empty plot on Grove side property next to Hyde
(1) 248 Golden Gate empty plot
(1) 101 Hyde empty plot
(2) 155 Hyde empty plots
(5) 50 UN Plaza 5 empty plots in plaza next to Hyde street
(1) 381 Turk empty plot
(2) 259 Hyde 2 empty plots on Eddy side of property
(1) 455 Eddy with stump
(1) 555 Ellis empty plot
(1) 570 Ellis empty plot
(1) 707 O'Farrell empty plot
(1) 656 O'Farrell empty plot
(1) 626 O'Farrell with stump
(1) 825 Geary empty plot
(2) 765 Geary 1 dying tree in plot
(1) 747 Geary 1 dying tree in plot
(1) 735 Geary 1 dying tree in plot
(1) 667-669 Geary empty plot
(1) 550 Leavenworth empty plot
(1) 540 O'Farrell empty plot
(1) 525 O'Farrell empty plot
(2) 545 O'Farrell 1 empty plot
1 with stump
(1) 434 Leavenworth empty plot
(3) 480 Ellis (2) empty plots on Ellis
(1) empty plot on Leavenworth side of property
(1) 391 Leavenworth empty plot
(2) 345 Leavenworth empty plots
(1) 335 Leavenworth empty plot
(1) 240 Leavenworth empty plot with 3 poles and bag
(1) 222 Leavenworth empty plot
(1) 237 Leavenworth tree cut in half
(1) 294 Turk on Leavenworth side of property with stump

(1) 240 Turk empty plot
(5) 201 Turk Five empty plots
(1) 275 Turk empty plot
(1) 191 Golden Gate on Leavenworth side of property with 3 poles
(1) 86 Mc Allister plot with stump
(1) 50 Jones empty plot
(2) 121 Golden Gate on Jones side of property empty plots
(1) 180 Jones no tree 4 poles, 4 braces and screen in plot
(1) 265 Eddy empty plot
(4) 246 Eddy 1 empty plot on Eddy
(2) stumps on Jones side of property
(1) empty plot on Ellis side of property
(1) 230 Eddy on Jones side of property with stump
(1) 345 Jones empty plot with pole
(1) 387 Ellis with 2 foot wide stump
(1) 201 Ellis with 2 poles
(1) 424 Jones empty plot
(3) 450 Jones 3 empty plots
(2) 516 O'Farrell 1 empty plot
1 with 2poles & bag
(1) 520 Jones 1 planter box empty
(1) 532 Jones empty plot with 2 poles
(1) 540 Jones empty plot with 1 pole
(1) 545 Jones empty plot
(1) 634 Geary empty plot
(2) 333 Taylor pot with 3 poles, braces and screen
1 plot with stump
(1) 231 Ellis empty plot
(1) 222 Taylor empty plot with stump & 3 poles
(1) 960 Market on Turk side of property with stump, 3 poles & braces
(1) 55 Mason empty plot
(2) 1129 Market empty plots
(1) 1236 Market empty plot
(1) 1240 Market empty plot

Total trees survey 168 in 117 different locations
North of Market is Van Ness to Geary to Market
Total of 70 square blocks covered

THE ABOVE SURVEY IS THE PROPERTY OF:
TENDERLOIN TREE COMMITTEE

From:	Board of Supervisors (BOS)
To:	BOS-Supervisors; BOS-Legislative Aides
Cc:	Calvillo, Angela (BOS); Somera, Alisa (BOS); Ng, Wilson (BOS); De Asis, Edward (BOS); Mchugh, Eileen (BOS); BOS-Operations; BOS Legislation, (BOS); Carroll, John (BOS)
Subject:	2 Letters regarding File No. 251211
Date:	Thursday, April 9, 2026 2:05:55 PM
Attachments:	2 Letters regarding File No. 251211.pdf

Hello,

Please see attached for 2 letters regarding File No. 251211.

> **File No. 251211:** Ordinance amending the Public Works Code to allow development projects to satisfy street tree planting requirements through payment of an in lieu fee or providing alternative landscaping; exempt accessory dwelling units from street tree planting requirements; eliminate appeals to the Board of Appeals for tree removals undertaken by City departments and commissions; and update in lieu fee reporting requirements; amending the Administrative Code to create a separate account within the Adopt-A-Tree Fund to receive in lieu fees for street tree requirements; amending the Planning Code to update street tree applicability requirements; affirming the Planning Department's determination under the California Environmental Quality Act; making findings of consistency with the General Plan, and the eight priority policies of Planning Code, Section 101.1; and making public necessity, convenience, and welfare findings under Planning Code, Section 302. (Mayor, Wong)

Sincerely,

Joe Adkins
Office of the Clerk of the Board
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
Phone: (415) 554-5184 | Fax: (415) 554-5163
board.of.supervisors@sfgov.org | www.sfbos.org

From:	San Francisco Tree Campaign
To:	Board of Supervisors (BOS)
Cc:	Carroll, John (BOS)
Subject:	Strong Opposition to File No. 251211
Date:	Sunday, April 5, 2026 4:09:50 PM
Attachments:	South of Market Tree Survey March April 2026.doc

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Board of Supervisors, City and County of San Francisco
Land Use and Transportation Committee
c/o Clerk of the Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
Email: clerk.boardofsupervisors@sfgov.org

Re: Strong Opposition to File No. 251211

Ordinance Amending Public Works, Administrative, and Planning Codes Regarding Street Trees (Eliminating Public Appeals for City-Initiated Tree Removals and Related Changes)

Submitted by: [San Francisco Tree Campaign/ Advocate, Board of Supervisors District 6 (South of Market / SoMa)

Date: April 5, 2026

(San Francisco Tree Campaign attach your District 6 Empty Street Tree Plot List as supporting documentation)

Dear President and Members of the Board of Supervisors,I am writing as a District 8 resident who has personally surveyed and compiled a complete list of every empty street tree plot (vacant basin or potential planting site) across all rectangular blocks in District 6 neighborhood—from the Embarcadero to Channel Street, 13th Street, and Market Street. This detailed inventory has already been shared with Public Works Bureau of Urban Forestry, Friends of the Urban Forest, and local neighborhood groups. It highlights the urgent need to plant more trees in low-canopy areas of SoMa, not remove them without meaningful public oversight.I strongly oppose File 251211, particularly the provision that would remove the public's right to appeal any City-initiated tree removal permit. This change is unnecessary, harmful to our urban

forest, and directly contradicts San Francisco's climate and equity goals. I ask the Board to reject the ordinance as written.The two core issues with this proposal are clear:

1. Potential for Abuse and Unnecessary Silencing of the Public
   The City has provided no specific examples of tree-removal appeals causing costly delays to legitimate projects. The Board of Appeals handles these matters quickly (average 75 days), a timeframe that can easily be built into any City construction schedule. Removing—or even compressing—the public's appeal right for City-initiated removals (by DPW, SFMTA, or other agencies) would eliminate a critical check against abuse. It effectively silences tax-paying residents from having any voice when hundreds of trees are at risk on public projects. In a city already struggling with transparency, this change would rig the system further in favor of agencies and developers while sidelining community input.

2. 2. Silencing the Public on Climate Resilience, Public Health, and Green Infrastructure
   Street trees are not optional—they are essential infrastructure for cooling our streets, improving air quality, managing stormwater, and supporting mental and physical health in dense neighborhoods like District 6. Eliminating appeals would prevent the very successes we have seen through public engagement:

- On 24th Street (Mission–Potrero), appeals saved 45 trees and created the award-winning Mission Verde volunteer watering program, which planted three times as many trees along the Calle 24 Cultural Corridor.

- Appeals forced UCSF to follow the law and pay $242,000 into the Adopt-a-Tree Fund.

- Half the trees proposed for removal on Van Ness were saved through the appeal process.

- A grove of large sycamores at Second and Folsom was preserved, leading to 2x replacement planting and policy changes later adopted into the Climate Action Plan.

- The mere threat of appeals stopped the disastrous proposal to remove over 700 trees on Market Street.

My District 6 empty-plot survey proves we have hundreds of viable planting sites right now. The 3500 Trees Project and Friends of the Urban Forest's upcoming SoMa community planting event on April 18, 2026, are actively working to fill these gaps. Removing appeal rights would undermine exactly the community–City partnerships needed to expand our tree canopy, not shrink it.This legislation is an affront to democratic participation at a time when San Franciscans are demanding more—not less—voice in decisions that affect our neighborhoods, climate resilience, and future generations. The Board of Appeals, Urban Forestry Council (non-City members), Planning Commissioners, and thousands of residents have already voiced the same

concerns.I urge you to reject File 251211 and instead work with community advocates like me to protect and grow San Francisco's urban forest. I am happy to share my full District 6 empty-plot list and data, and I welcome any opportunity to discuss constructive alternatives that maintain public oversight while streamlining genuine efficiencies.Thank you for considering this comment and for protecting the voices of San Franciscans residents.

Sincerely,

San Francisco Tree Campaign

South of Market Tree Survey
March - April 2026 spring break

(1) 6 Valencia empty plot
(1) 14 Valencia plot with 3 foot stump
(1) 68 McCoppin empty plot
(3) 1330 Stevenson 3 empty plots
(1) 1393 Stevenson empty plot
(1) 35-37 McCoppin empty plot
(1) 1 Mc Coppin empty plot on Otis side of property
(1) 2 Gough empty plot on Otis side of property
(1) 1667 Market empty plot on Gough side of property
(1) 83 Colton empty plot with 3 poles and braces
(1) 95 Brady tree loop off 2 feet high with 3 poles and braces
(2) 98 Brady one empty plot on Brady
One empty plot on Otis side of the property
(6) 30-12th Street four empty plots on Otis
Two empty plots with stumps on 12th Street
(1) 43-50-12th Street empty plot with stump
(1) 20-12th Street empty plot with stump
(1) 20 South Van Ness empty plot on Market side of property
(1) 49 South Van Ness 1 empty plot
(1) 875 Stevenson Streetscape missing multi trees
(4) 1400 Mission St one empty plot on Jessie side of the property
Three empty plots on 10th Street side of the property
(1) 66-8th Street plot with stump on Mission side of the property
(1) 38-8th Street empty plot
(3) 95-7th Street
One on 7th Street plot tree broken
One on Stevenson side of property tree broken
One on Mission side of property tree broken
(1) 1179 Mission empty plot

(1) 121-7th Street empty plot on Minna side of the property
(7) 1045 Mission on Minna side of the property
20 Minna empty plot
10 Minna empty plot
16-19 Minna empty plot
14-16 Minna empty plot
12 Minna empty plot
Two on 11 Minna 2 empty plots
(1) 851 Minna empty plot
(1) 22 Russ empty plot
(2) 547 Natoma empty plot
One empty plot on Russ side of the property
(1) 50 Russ empty plot
(3) 51-55 Russ three empty plots
(2) 537 Natoma two plots with stumps
(1) 515 Natoma empty plot
(1) 522-524 Natoma empty plot
(1) 544 Natoma empty plot
(1) 25 Russ empty plot on Natoma side of the property
(2) 535 Minna two empty plots
(2) 524 Natoma empty plot
One plot with stump
(2) 111-7th Street two empty plots
(1) 1045 Mission empty plot
(1) 1068 Mission empty plot
(1) 1038 Mission empty plot
(1) 1019 Mission empty plot
(2) 514-518 Minna two empty plots
(1) 479 Natoma empty plot
(1) 460 Natoma empty plot
(2) 833 Mission empty plot
One empty plot on 5th Street side of the property
(1) 811 Mission empty plot
(1) 801 Mission empty plot
(2) 88 4th Street empty plot
One empty plot on Mission side of the property
(3) 833 Mission empty plot
Two empty plots on Minna side of the property
(1) 783 Mission empty plot
(2) 45 Beale two empty plots
(2) 333 Market two empty plots Beale side of the property
(1) 101 Mission empty plot on Spear side of the property
(1) 101 Spear St empty plot
(1) 1 Mission empty plot
(1) 735 Market empty plot
(1) 198 Valencia 1 empty plot on Duboce side of the property
(4) 1680 Mission
One corner loop off tree
One dead tree

One empty plot
One with stump
(1) 100 South Van Ness empty plot on Plum side of property
(1) 176 South Van Ness empty plot
(3) 101 South Van Ness three empty plots
(2) 1690 Folsom two empty plots
(2) 24-26 Bernice two empty plots
(1) 255-12th Street empty plot
(1) 374-11th Street plot with stump
(1) 355-11th Street empty plot
(1) 1435 Folsom empty plot
(1) 1480 Folsom tree loop off on 11th Street side of the property
(1) 905 Minna empty plot
(1) 1325 Howard empty plot on Dore side of the property
(1) 265-11th Street plot with stump on Dore side of the property
(1) 291-11th Street empty plot
(2) 353-10th Street two empty plots
(1) 38-42 Sheridan 1 dead tree in plot
(1) 364-9th Street empty plot
(1) 349-9th Street empty plot
(2) 346-9th Street two empty plots
(3) 345-9th Street three empty plots on Ringold side of the property
(1) 55 Ringold empty plot
(1) 56 Ringold empty plot
(1) 1245 Folsom on Ringold side of the property empty plot
1198 Folsom
One bulb out missing trees
One bulb out on 8th Street side missing trees
(1) 295-9th Street plot with stump
(1) 695 Mission empty pot
(1) 705-5th Street empty plot
(4) 1180 Howard
One empty plot on Natoma side of the property
One empty plot on 8th Street side of the property
Two on Howard with empty plots
(3) 1166 Howard three empty plots
(1) 1188 Howard 1 loop of tree
(1) 175 Langton empty plot
(1) 923 Folsom empty plot on Langton side of the property
(2) 300-7th Street two with stumps on Langton side of the property
(1) 1150 Folsom empty plot on Rausch Street side of the property
(1) 10 Langton on Howard side of the property empty plot
(1) 24-28 Langton empty plot with stump
(1) 42 Langton empty plot
(1) 77 Langton empty plot
(1) 81 Langton empty plot
th

(1) 345-7 Street empty plot
(1) 45 Cleveland empty plot
(1) 1061 Folsom empty plot
(1) 1067 Folsom empty plot
(1) 56 Moss empty plot
(1) 10 Moss empty plot
(1) 1097 Howard empty plot
(2) 1026 Howard on Harriet side of the property two empty plots
(1) 80 Harriet empty plot
(1) 1068 Folsom empty plot on Harrison side of property
(1) 101 Columbia plot with stump on Folsom side of the property
(1) 1001 Folsom plot with stump
(1) 301-6th Street empty plot on Shipley side of the property
(1) 275-6th Street empty plot on Clementina side of property
(2) 426 Clementina two empty plots
(1) 436 Clementina empty plot
(3) 400 Clementina two empty plots
One empty plot on Tehama side of the property
(3) 927 Howard three empty planters boxes one with dead tree
(1) 888 Howard empty plot on 5th Street side of the property
(1) 353 Clementina empty plot
(2) 360 Clementina two empty plots
(2) 868 Folsom on Clementina side of the property two empty plots
(2) 383 Tehama two empty plots
(1) 851 Howard on Tehama side of property one empty plot
(2) 300-4th Street one empty plot
One no tree in plot on Folsom side of the property
(5) 360-4th Street Five on Shipley side of the property
(1) 747 Folsom empty plot
(1) 637 Howard empty plot
(1) 650 Folsom empty plot
(1) 608 Folsom empty plot
(1) 600 Harrison empty plot on 2nd Street side of the property
(2) 239-1st Street two empty plots on Tehama side of the property
(2) 500 Folsom two empty plots on Clementina side of the property
(2) 19 Clementina empty plots with stumps
(1) 255-1st Street empty plot
(1) 250 Howard empty plot
(1) 2 Rincon Place empty plot with stump
(1) 201 Folsom empty pot with stump
(1) 250 Embarcadero empty plot
(1) 1 Steuart Lane one empty planter box
(2) 88 Howard two empty plots with stumps
(4) 450 -10th Street three empty plots
1 empty plot on Harrison side of the property with stump
(1) 1240 Bryant empty plot
(1) 590-10th Street empty plot on Division side of the property
(1) 1555 Bryant empty plot

(1) 1174 Bryant empty plot
(1) 264 Dore empty plot
(1) 233-235 Dore empty plot
(1) 455-9th Street plot with stump
(1) 407 9th Street empty plot
(1) 25A McLean empty plot
(1) 1108 Bryant empty plot
(1) 1000 Brannan empty plot
(2) 555-9th Street empty plot
(10 1070 Bryant empty plot
(1) 468-8th Street empty plot
(5+) 345-9th Street two empty plots
Three empty plots on Ringold side of the property
1 large bed on Gordon side of the property
(1+) 1222 Harrison multi planter beds missing trees
(2) 305 Langton empty plot
(5) 945 Bryant Five empty plots
(1) 975 Bryant empty planter pot
(1) 41 Decatur empty plot
(1) 57-59 Gilbert empty plot with wooden fence on 2 sides of the plot
(4) 18 Sherman Street on Columbia side of the park four empty plots
(2) 85 Columbia two empty plots
(1) 75 Columbia empty plot
(3) 59 Columbia three empty plots
(5) 57 Columbia five empty plots
(2) 1020 Harrison St on Columbia side of the property two empty plots
(3) 1000 Harrison St on 6th Street side of the property empty plot
2 empty planters
(1) 1001 Harrison on 6th Street side of the property empty plot
(1) 475-6th Street empty plot
(3) 750 Bryant on Oak side of the property three empty plots
(2) 701 Bryant two empty plots
(2) 673 Brannan 1 empty plot and 1 with stump
(2) 651 Brannan two empty plots
(1) 601 Brannan empty plot on 5th Street side of the property
(4) 655-695 5th Street four empty plots
(1) 633 Bryant with stump on Freelon side of the property
(1) 132-134 Freelon empty plot
(1) 114 Freelon empty plot
(1) 230 Ritch empty plot
(5) 475-4th Street Five empty plots
(1) 737 Harrison empty plot
(2) 88 Perry Street two empty plots
(10) Stillman under Freeway ten empty boxes
(1) 93-99 Stillman empty plot
(1) 87-91 Stillman empty plot
(1) 51 Stillman across street empty plot
(3) 39 Stillman three empty plots

(1) 439 Bryant empty plot
(1) 551 3rd Street plot with stump
(1) 599 3rd Street empty plot on Brannan side of the property
(1) 366 Brannan empty plot
(1) 45 South Park empty plot
(1) 35 South Park empty plot
(1) 1 South Park empty plot
(1) 22 South Park empty plot
(1) 525-2nd Street empty plot
333 Brannan planter beds no trees
(5) 180 Brannan 1 with stump
(2) 570 Beale two empty plots
(1) 501 Beale across the street empty plot
(1) 500 Beale empty plot
(1) 500-599 Beale on Delancey side of the property empty plot
(2) 540 Delancey two empty plots
(6) 1 Federal 6 missing trees on both sides of the street
(2) 355 Bryant two empty plots
(1) 333 Bryant empty plot
(7) 487 Harrison seven beds without trees
(1) 201C Harrison with stump
(2) 1 Harrison on Embarcadero side of the property two empty beds with no trees
(1) 360 Spear empty plot
(1) 1700 Harrison on Division side of the property plot with stump
(1) 150 Division on Vermont side of the property empty plot
(1) 297 Kansas Street empty plot
(1) 251 Rhode Island plot with stump
(16) 151 Hopper 15 empty planter boxes and empty plot
(1) 1001-16th Street empty plot
(2) 900-16th Street across on 7th Street side of the property two empty plots
(1) 900-16th Street across street empty plot
(15) 24 Willie Mays Place fifteen empty planter boxes
(1) 301-251 King empty plot
(1) 360 Berry empty plot
(1) 298 King Street on Townsend side of the property empty plot
(1) 260 Townsend on Lusk side of the property empty plot
(55) 24-185 King Street fifty-five planter boxes with no trees
(2) 701-2nd Street two empty plots
(1) 88 Townsend St empty plot
(1) 64 Townsend St empty plot
(2) 2 Townsend St on Colin Kelly Jr side of the property two empty plots
(3) 2 Townsend on Townsend three empty plots
(3) 600 Embarcadero 1 empty plot and two with stumps
(1) 699 Delancy empty plot
(1) 650 Delancy empty plot
(2) 4 Bayside Village one empty plot and one with stump
(2) 400 Beale two empty plots
+ 375 Beale with multi planter beds empty
(1) 333 Beale empty plot

(1) Steuart and Market Streets palm tree cut in half

THE ABOVE SURVEY IS THE PROPERTY OF: SAN FRANCISCO TREE CAMPAIGN

https://sanfranciscotreecampaign.blogspot.com

South of Market Tree Survey
March - April 2026 spring break

(1) 6 Valencia empty plot
(1) 14 Valencia plot with 3 foot stump
(1) 68 Mc Coppin empty plot
(3) 1330 Stevenson 3 empty plots
(1) 1393 Stevenson empty plot
(1) 35-37 Mc Coppin empty plot
(1) 1 Mc Coppin empty plot on Otis side of property
(1) 2 Gough empty plot on Otis side of property
(1) 1667 Market empty plot on Gough side of property
(1) 83 Colton empty plot with 3 poles and braces
(1) 95 Brady tree loop off 2 feet high with 3 poles and braces
(2) 98 Brady one empty plot on Brady
One empty plot on Otis side of the property
(6) 30-12th Street four empty plots on Otis
Two empty plots with stumps on 12th Street
(1) 43-50-12th Street empty plot with stump
(1) 20-12th Street empty plot with stump
(1) 20 South Van Ness empty plot on Market side of property
(1) 49 South Van Ness 1 empty plot
(1) 875 Stevenson Streetscape missing multi trees
(4) 1400 Mission St one empty plot on Jessie side of the property
Three empty plots on 10th Street side of the property
(1) 66-8th Street plot with stump on Mission side of the property
(1) 38-8th Street empty plot
(3) 95-7th Street
One on 7th Street plot tree broken
One on Stevenson side of property tree broken
One on Mission side of property tree broken
(1) 1179 Mission empty plot
(1) 121-7th Street empty plot on Minna side of the property
(7) 1045 Mission on Minna side of the property
20 Minna empty plot
10 Minna empty plot
16-19 Minna empty plot
14-16 Minna empty plot
12 Minna empty plot
Two on 11 Minna 2 empty plots
(1) 851 Minna empty plot
(1) 22 Russ empty plot
(2) 547 Natoma empty plot

One empty plot on Russ side of the property
(1) 50 Russ empty plot
(3) 51-55 Russ three empty plots
(2) 537 Natoma two plots with stumps
(1) 515 Natoma empty plot
(1) 522-524 Natoma empty plot
(1) 544 Natoma empty plot
(1) 25 Russ empty plot on Natoma side of the property
(2) 535 Minna two empty plots
(2) 524 Natoma empty plot
One plot with stump
(2) 111-7th Street two empty plots
(1) 1045 Mission empty plot
(1) 1068 Mission empty plot
(1) 1038 Mission empty plot
(1) 1019 Mission empty plot
(2) 514-518 Minna two empty plots
(1) 479 Natoma empty plot
(1) 460 Natoma empty plot
(2) 833 Mission empty plot
One empty plot on 5th Street side of the property
(1) 811 Mission empty plot
(1) 801 Mission empty plot
(2) 88 4th Street empty plot
One empty plot on Mission side of the property
(3) 833 Mission empty plot
Two empty plots on Minna side of the property
(1) 783 Mission empty plot
(2) 45 Beale two empty plots
(2) 333 Market two empty plots Beale side of the property
(1) 101 Mission empty plot on Spear side of the property
(1) 101 Spear St empty plot
(1) 1 Mission empty plot
(1) 735 Market empty plot
(1) 198 Valencia 1 empty plot on Duboce side of the property
(4) 1680 Mission
One corner loop off tree
One dead tree
One empty plot
One with stump
(1) 100 South Van Ness empty plot on Plum side of property
(1) 176 South Van Ness empty plot
(3) 101 South Van Ness three empty plots
(2) 1690 Folsom two empty plots
(2) 24-26 Bernice two empty plots
(1) 255-12th Street empty plot

(1) 374-11th Street plot with stump
(1) 355-11th Street empty plot
(1) 1435 Folsom empty plot
(1) 1480 Folsom tree loop off on 11th Street side of the property
(1) 905 Minna empty plot
(1) 1325 Howard empty plot on Dore side of the property
(1) 265-11th Street plot with stump on Dore side of the property
(1) 291-11th Street empty plot
(2) 353-10th Street two empty plots
(1) 38-42 Sheridan 1 dead tree in plot
(1) 364-9th Street empty plot
(1) 349-9th Street empty plot
(2) 346-9th Street two empty plots
(3) 345-9th Street three empty plots on Ringold side of the property
(1) 55 Ringold empty plot
(1) 56 Ringold empty plot
(1) 1245 Folsom on Ringold side of the property empty plot
1198 Folsom
One bulb out missing trees
One bulb out on 8th Street side missing trees
(1) 295-9th Street plot with stump
(1) 695 Mission empty pot
(1) 705-5th Street empty plot
(4) 1180 Howard
One empty plot on Natoma side of the property
One empty plot on 8th Street side of the property
Two on Howard with empty plots
(3) 1166 Howard three empty plots
(1) 1188 Howard 1 loop of tree
(1) 175 Langton empty plot
(1) 923 Folsom empty plot on Langton side of the property
(2) 300-7th Street two with stumps on Langton side of the property
(1) 1150 Folsom empty plot on Rausch Street side of the property
(1) 10 Langton on Howard side of the property empty plot
(1) 24-28 Langton empty plot with stump
(1) 42 Langton empty plot
(1) 77 Langton empty plot
(1) 81 Langton empty plot
(1) 345-7th Street empty plot
(1) 45 Cleveland empty plot
(1) 1061 Folsom empty plot
(1) 1067 Folsom empty plot
(1) 56 Moss empty plot
(1) 10 Moss empty plot
(1) 1097 Howard empty plot
(2) 1026 Howard on Harriet side of the property two empty plots

(1) 80 Harriet empty plot
(1) 1068 Folsom empty plot on Harrison side of property
(1) 101 Columbia plot with stump on Folsom side of the property
(1) 1001 Folsom plot with stump
(1) 301-6th Street empty plot on Shipley side of the property
(1) 275-6th Street empty plot on Clementina side of property
(2) 426 Clementina two empty plots
(1) 436 Clementina empty plot
(3) 400 Clementina two empty plots
One empty plot on Tehama side of the property
(3) 927 Howard three empty planters boxes one with dead tree
(1) 888 Howard empty plot on 5th Street side of the property
(1) 353 Clementina empty plot
(2) 360 Clementina two empty plots
(2) 868 Folsom on Clementina side of the property two empty plots
(2) 383 Tehama two empty plots
(1) 851 Howard on Tehama side of property one empty plot
(2) 300-4th Street one empty plot
One no tree in plot on Folsom side of the property
(5) 360-4th Street Five on Shipley side of the property
(1) 747 Folsom empty plot
(1) 637 Howard empty plot
(1) 650 Folsom empty plot
(1) 608 Folsom empty plot
(1) 600 Harrison empty plot on 2nd Street side of the property
(2) 239-1st Street two empty plots on Tehama side of the property
(2) 500 Folsom two empty plots on Clementina side of the property
(2) 19 Clementina empty plots with stumps
(1) 255-1st Street empty plot
(1) 250 Howard empty plot
(1) 2 Rincon Place empty plot with stump
(1) 201 Folsom empty pot with stump
(1) 250 Embarcadero empty plot
(1) 1 Steuart Lane one empty planter box
(2) 88 Howard two empty plots with stumps
(4) 450 -10th Street three empty plots
1 empty plot on Harrison side of the property with stump
(1) 1240 Bryant empty plot
(1) 590-10th Street empty plot on Division side of the property
(1) 1555 Bryant empty plot
(1) 1174 Bryant empty plot
(1) 264 Dore empty plot
(1) 233-235 Dore empty plot
(1) 455-9th Street plot with stump
(1) 407 9th Street empty plot
(1) 25A McLean empty plot

(1) 1108 Bryant empty plot
(1) 1000 Brannan empty plot
(2) 555-9th Street empty plot
(10 1070 Bryant empty plot
(1) 468-8th Street empty plot
(5+) 345-9th Street two empty plots
Three empty plots on Ringold side of the property
1 large bed on Gordon side of the property
(1+) 1222 Harrison multi planter beds missing trees
(2) 305 Langton empty plot
(5) 945 Bryant Five empty plots
(1) 975 Bryant empty planter pot
(1) 41 Decatar empty plot
(1) 57-59 Gilbert empty plot with wooden fence on 2 sides of the plot
(4) 18 Sherman Street on Columbia side of the park four empty plots
(2) 85 Columbia two empty plots
(1) 75 Columbia empty plot
(3) 59 Columbia three empty plots
(5) 57 Columbia five empty plots
(2) 1020 Harrison St on Columbia side of the property two empty plots
(3) 1000 Harrison St on 6th Street side of the property empty plot
2 empty planters
(1) 1001 Harrison on 6th Street side of the property empty plot
(1) 475-6th Street empty plot
(3) 750 Bryant on Oak side of the property three empty plots
(2) 701 Bryant two empty plots
(2) 673 Brannan 1 empty plot and 1 with stump
(2) 651 Brannan two empty plots
(1) 601 Brannan empty plot on 5th Street side of the property
(4) 655-695 5th Street four empty plots
(1) 633 Bryant with stump on Freelon side of the property
(1) 132-134 Freelon empty plot
(1) 114 Freelon empty plot
(1) 230 Ritch empty plot
(5) 475-4th Street Five empty plots
(1) 737 Harrison empty plot
(2) 88 Perry Street two empty plots
(10) Stillmon under Freeway ten empty boxes
(1) 93-99 Stillman empty plot
(1) 87-91 Stillman empty plot
(1) 51 Stillman across street empty plot
(3) 39 Stillman three empty plots
(1) 439 Bryant empty plot
(1) 551 3rd Street plot with stump
(1) 599 3rd Street empty plot on Brannan side of the property
(1) 366 Brannan empty plot

(1) 45 South Park empty plot
(1) 35 South Park empty plot
(1) 1 South Park empty plot
(1) 22 South Park empty plot
(1) 525-2nd Street empty plot
333 Brannan planter beds no trees
(5) 180 Brannan 1 with stump
(2) 570 Beale two empty plots
(1) 501 Beale across the street empty plot
(1) 500 Beale empty plot
(1) 500-599 Beale on Delancy side of the property empty plot
(2) 540 Delency two empty plots
(6) 1 Federal 6 missing trees on both sides of the street
(2) 355 Bryant two empty plots
(1) 333 Bryant empty plot
(7) 487 Harrison seven beds without trees
(1) 201C Harrison with stump
(2) 1 Harrison on Embarcadero side of the property two empty beds with no trees
(1) 360 Spear empty plot
(1) 1700 Harrison on Division side of the property plot with stump
(1) 150 Division on Vermont side of the property empty plot
(1) 297 Kansas Street empty plot
(1) 251 Rhode Island plot with stump
(16) 151 Hopper 15 empty planter boxes and empty plot
(1) 1001-16th Street empty plot
(2) 900-16th Street across on 7th Street side of the property two empty plots
(1) 900-16th Street across street empty plot
(15) 24 Willie Mays Place fifteen empty planter boxes
(1) 301-251 King empty plot
(1) 360 Berry empty plot
(1) 298 King Street on Townsend side of the property empty plot
(1) 260 Townsend on Lusk side of the property empty plot
(55) 24-185 King Street fifty-five planter boxes with no trees
(2) 701-2nd Street two empty plots
(1) 88 Townsend St empty plot
(1) 64 Townsend St empty plot
(2) 2 Townsend St on Colin Kelly Jr side of the property two empty plots
(3) 2 Townsend on Townsend three empty plots
(3) 600 Embarcadero 1 empty plot and two with stumps
(1) 699 Delancy empty plot
(1) 650 Delancy empty plot
(2) 4 Bayshide Village one empty plot and one with stump
(2) 400 Beale two empty plots
+ 375 Beale with multi planter beds empty
(1) 333 Beale empty plot
(1) Steuart and Market Streets palm tree cut in half

THE ABOVE SURVEY IS THE PROPERTY OF: SAN FRANCISCO TREE CAMPAIGN

From:	Shawna J. Mcgrew
To:	Board of Supervisors (BOS); Carroll, John (BOS); Melgar, Myrna (BOS); Chen, Chyanne (BOS); ChenStaff; MahmoodStaff; Kathy Howard
Subject:	SUPPORT TREES
Date:	Thursday, April 2, 2026 2:26:53 PM

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As the poem says "I think I shall never see a poem as lovely as a TREE" but I fear the City of St. Francis does not see it that way.
WHY? Are the developers more important to you than the production of oxygen and the absorbing of carbon dioxide.
Did you know that trees boost mental and physical health of our environment not only for us but for a diversity of life?
What feelings do you get when you walk down a street lined with trees and hear birds singing and bees buzzing? Compare that feeling with walking down a concrete street with only ugly box buildings.
If a big ugly concrete condos go up in my neighborhood why should they not have trees surrounding them?
Seriously why are you giving developers a big out and not supporting our environment?
Shame on you.
Shawna McGrew
Oskar Rosas Lynn Hill
Carli Fullerton
John Hanbury

From:	San Francisco Tree Campaign
To:	Board of Supervisors (BOS)
Cc:	Carroll, John (BOS)
Subject:	Strong Opposition to File No. 251211
Date:	Sunday, April 5, 2026 4:09:49 PM
Attachments:	South of Market Tree Survey March April 2026.doc

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Board of Supervisors, City and County of San Francisco
Land Use and Transportation Committee
c/o Clerk of the Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
Email: clerk.boardofsupervisors@sfgov.org

Re: Strong Opposition to File No. 251211

Ordinance Amending Public Works, Administrative, and Planning Codes Regarding Street Trees (Eliminating Public Appeals for City-Initiated Tree Removals and Related Changes)

Submitted by: [San Francisco Tree Campaign/ Advocate, Board of Supervisors District 6 (South of Market / SoMa)

Date: April 5, 2026

(San Francisco Tree Campaign attach your District 6 Empty Street Tree Plot List as supporting documentation)

Dear President and Members of the Board of Supervisors,I am writing as a District 8 resident who has personally surveyed and compiled a complete list of every empty street tree plot (vacant basin or potential planting site) across all rectangular blocks in District 6 neighborhood—from the Embarcadero to Channel Street, 13th Street, and Market Street. This detailed inventory has already been shared with Public Works Bureau of Urban Forestry, Friends of the Urban Forest, and local neighborhood groups. It highlights the urgent need to plant more trees in low-canopy areas of SoMa, not remove them without meaningful public oversight.I strongly oppose File 251211, particularly the provision that would remove the public's right to appeal any City-initiated tree removal permit. This change is unnecessary, harmful to our urban

forest, and directly contradicts San Francisco's climate and equity goals. I ask the Board to reject the ordinance as written.The two core issues with this proposal are clear:

1. Potential for Abuse and Unnecessary Silencing of the Public
   The City has provided no specific examples of tree-removal appeals causing costly delays to legitimate projects. The Board of Appeals handles these matters quickly (average 75 days), a timeframe that can easily be built into any City construction schedule. Removing—or even compressing—the public's appeal right for City-initiated removals (by DPW, SFMTA, or other agencies) would eliminate a critical check against abuse. It effectively silences tax-paying residents from having any voice when hundreds of trees are at risk on public projects. In a city already struggling with transparency, this change would rig the system further in favor of agencies and developers while sidelining community input.

2. 2. Silencing the Public on Climate Resilience, Public Health, and Green Infrastructure
   Street trees are not optional—they are essential infrastructure for cooling our streets, improving air quality, managing stormwater, and supporting mental and physical health in dense neighborhoods like District 6. Eliminating appeals would prevent the very successes we have seen through public engagement:

- On 24th Street (Mission–Potrero), appeals saved 45 trees and created the award-winning Mission Verde volunteer watering program, which planted three times as many trees along the Calle 24 Cultural Corridor.

- Appeals forced UCSF to follow the law and pay $242,000 into the Adopt-a-Tree Fund.

- Half the trees proposed for removal on Van Ness were saved through the appeal process.

- A grove of large sycamores at Second and Folsom was preserved, leading to 2x replacement planting and policy changes later adopted into the Climate Action Plan.

- The mere threat of appeals stopped the disastrous proposal to remove over 700 trees on Market Street.

My District 6 empty-plot survey proves we have hundreds of viable planting sites right now. The 3500 Trees Project and Friends of the Urban Forest's upcoming SoMa community planting event on April 18, 2026, are actively working to fill these gaps. Removing appeal rights would undermine exactly the community–City partnerships needed to expand our tree canopy, not shrink it.This legislation is an affront to democratic participation at a time when San Franciscans are demanding more—not less—voice in decisions that affect our neighborhoods, climate resilience, and future generations. The Board of Appeals, Urban Forestry Council (non-City members), Planning Commissioners, and thousands of residents have already voiced the same

concerns.I urge you to reject File 251211 and instead work with community advocates like me to protect and grow San Francisco's urban forest. I am happy to share my full District 6 empty-plot list and data, and I welcome any opportunity to discuss constructive alternatives that maintain public oversight while streamlining genuine efficiencies.Thank you for considering this comment and for protecting the voices of San Franciscans residents.

Sincerely,

San Francisco Tree Campaign

South of Market Tree Survey
March - April 2026 spring break

(1) 6 Valencia empty plot
(1) 14 Valencia plot with 3 foot stump
(1) 68 McCoppin empty plot
(3) 1330 Stevenson 3 empty plots
(1) 1393 Stevenson empty plot
(1) 35-37 McCoppin empty plot
(1) 1 Mc Coppin empty plot on Otis side of property
(1) 2 Gough empty plot on Otis side of property
(1) 1667 Market empty plot on Gough side of property
(1) 83 Colton empty plot with 3 poles and braces
(1) 95 Brady tree loop off 2 feet high with 3 poles and braces
(2) 98 Brady one empty plot on Brady
One empty plot on Otis side of the property
(6) 30-12th Street four empty plots on Otis
Two empty plots with stumps on 12th Street
(1) 43-50-12th Street empty plot with stump
(1) 20-12th Street empty plot with stump
(1) 20 South Van Ness empty plot on Market side of property
(1) 49 South Van Ness 1 empty plot
(1) 875 Stevenson Streetscape missing multi trees
(4) 1400 Mission St one empty plot on Jessie side of the property
Three empty plots on 10th Street side of the property
(1) 66-8th Street plot with stump on Mission side of the property
(1) 38-8th Street empty plot
(3) 95-7th Street
One on 7th Street plot tree broken
One on Stevenson side of property tree broken
One on Mission side of property tree broken
(1) 1179 Mission empty plot

(1) 121-7th Street empty plot on Minna side of the property
(7) 1045 Mission on Minna side of the property
20 Minna empty plot
10 Minna empty plot
16-19 Minna empty plot
14-16 Minna empty plot
12 Minna empty plot
Two on 11 Minna 2 empty plots
(1) 851 Minna empty plot
(1) 22 Russ empty plot
(2) 547 Natoma empty plot
One empty plot on Russ side of the property
(1) 50 Russ empty plot
(3) 51-55 Russ three empty plots
(2) 537 Natoma two plots with stumps
(1) 515 Natoma empty plot
(1) 522-524 Natoma empty plot
(1) 544 Natoma empty plot
(1) 25 Russ empty plot on Natoma side of the property
(2) 535 Minna two empty plots
(2) 524 Natoma empty plot
One plot with stump
(2) 111-7th Street two empty plots
(1) 1045 Mission empty plot
(1) 1068 Mission empty plot
(1) 1038 Mission empty plot
(1) 1019 Mission empty plot
(2) 514-518 Minna two empty plots
(1) 479 Natoma empty plot
(1) 460 Natoma empty plot
(2) 833 Mission empty plot
One empty plot on 5th Street side of the property
(1) 811 Mission empty plot
(1) 801 Mission empty plot
(2) 88 4th Street empty plot
One empty plot on Mission side of the property
(3) 833 Mission empty plot
Two empty plots on Minna side of the property
(1) 783 Mission empty plot
(2) 45 Beale two empty plots
(2) 333 Market two empty plots Beale side of the property
(1) 101 Mission empty plot on Spear side of the property
(1) 101 Spear St empty plot
(1) 1 Mission empty plot
(1) 735 Market empty plot
(1) 198 Valencia 1 empty plot on Duboce side of the property
(4) 1680 Mission
One corner loop off tree
One dead tree

One empty plot
One with stump
(1) 100 South Van Ness empty plot on Plum side of property
(1) 176 South Van Ness empty plot
(3) 101 South Van Ness three empty plots
(2) 1690 Folsom two empty plots
(2) 24-26 Bernice two empty plots
(1) 255-12th Street empty plot
(1) 374-11th Street plot with stump
(1) 355-11th Street empty plot
(1) 1435 Folsom empty plot
(1) 1480 Folsom tree loop off on 11th Street side of the property
(1) 905 Minna empty plot
(1) 1325 Howard empty plot on Dore side of the property
(1) 265-11th Street plot with stump on Dore side of the property
(1) 291-11th Street empty plot
(2) 353-10th Street two empty plots
(1) 38-42 Sheridan 1 dead tree in plot
(1) 364-9th Street empty plot
(1) 349-9th Street empty plot
(2) 346-9th Street two empty plots
(3) 345-9th Street three empty plots on Ringold side of the property
(1) 55 Ringold empty plot
(1) 56 Ringold empty plot
(1) 1245 Folsom on Ringold side of the property empty plot
1198 Folsom
One bulb out missing trees
One bulb out on 8th Street side missing trees
(1) 295-9th Street plot with stump
(1) 695 Mission empty pot
(1) 705-5th Street empty plot
(4) 1180 Howard
One empty plot on Natoma side of the property
One empty plot on 8th Street side of the property
Two on Howard with empty plots
(3) 1166 Howard three empty plots
(1) 1188 Howard 1 loop of tree
(1) 175 Langton empty plot
(1) 923 Folsom empty plot on Langton side of the property
(2) 300-7th Street two with stumps on Langton side of the property
(1) 1150 Folsom empty plot on Rausch Street side of the property
(1) 10 Langton on Howard side of the property empty plot
(1) 24-28 Langton empty plot with stump
(1) 42 Langton empty plot
(1) 77 Langton empty plot
(1) 81 Langton empty plot
th

(1) 345-7 Street empty plot
(1) 45 Cleveland empty plot
(1) 1061 Folsom empty plot
(1) 1067 Folsom empty plot
(1) 56 Moss empty plot
(1) 10 Moss empty plot
(1) 1097 Howard empty plot
(2) 1026 Howard on Harriet side of the property two empty plots
(1) 80 Harriet empty plot
(1) 1068 Folsom empty plot on Harrison side of property
(1) 101 Columbia plot with stump on Folsom side of the property
(1) 1001 Folsom plot with stump
(1) 301-6th Street empty plot on Shipley side of the property
(1) 275-6th Street empty plot on Clementina side of property
(2) 426 Clementina two empty plots
(1) 436 Clementina empty plot
(3) 400 Clementina two empty plots
One empty plot on Tehama side of the property
(3) 927 Howard three empty planters boxes one with dead tree
(1) 888 Howard empty plot on 5th Street side of the property
(1) 353 Clementina empty plot
(2) 360 Clementina two empty plots
(2) 868 Folsom on Clementina side of the property two empty plots
(2) 383 Tehama two empty plots
(1) 851 Howard on Tehama side of property one empty plot
(2) 300-4th Street one empty plot
One no tree in plot on Folsom side of the property
(5) 360-4th Street Five on Shipley side of the property
(1) 747 Folsom empty plot
(1) 637 Howard empty plot
(1) 650 Folsom empty plot
(1) 608 Folsom empty plot
(1) 600 Harrison empty plot on 2nd Street side of the property
(2) 239-1st Street two empty plots on Tehama side of the property
(2) 500 Folsom two empty plots on Clementina side of the property
(2) 19 Clementina empty plots with stumps
(1) 255-1st Street empty plot
(1) 250 Howard empty plot
(1) 2 Rincon Place empty plot with stump
(1) 201 Folsom empty pot with stump
(1) 250 Embarcadero empty plot
(1) 1 Steuart Lane one empty planter box
(2) 88 Howard two empty plots with stumps
(4) 450 -10th Street three empty plots
1 empty plot on Harrison side of the property with stump
(1) 1240 Bryant empty plot
(1) 590-10th Street empty plot on Division side of the property
(1) 1555 Bryant empty plot

(1) 1174 Bryant empty plot
(1) 264 Dore empty plot
(1) 233-235 Dore empty plot
(1) 455-9th Street plot with stump
(1) 407 9th Street empty plot
(1) 25A McLean empty plot
(1) 1108 Bryant empty plot
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(2) 555-9th Street empty plot
(10 1070 Bryant empty plot
(1) 468-8th Street empty plot
(5+) 345-9th Street two empty plots
Three empty plots on Ringold side of the property
1 large bed on Gordon side of the property
(1+) 1222 Harrison multi planter beds missing trees
(2) 305 Langton empty plot
(5) 945 Bryant Five empty plots
(1) 975 Bryant empty planter pot
(1) 41 Decatur empty plot
(1) 57-59 Gilbert empty plot with wooden fence on 2 sides of the plot
(4) 18 Sherman Street on Columbia side of the park four empty plots
(2) 85 Columbia two empty plots
(1) 75 Columbia empty plot
(3) 59 Columbia three empty plots
(5) 57 Columbia five empty plots
(2) 1020 Harrison St on Columbia side of the property two empty plots
(3) 1000 Harrison St on 6th Street side of the property empty plot
2 empty planters
(1) 1001 Harrison on 6th Street side of the property empty plot
(1) 475-6th Street empty plot
(3) 750 Bryant on Oak side of the property three empty plots
(2) 701 Bryant two empty plots
(2) 673 Brannan 1 empty plot and 1 with stump
(2) 651 Brannan two empty plots
(1) 601 Brannan empty plot on 5th Street side of the property
(4) 655-695 5th Street four empty plots
(1) 633 Bryant with stump on Freelon side of the property
(1) 132-134 Freelon empty plot
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(1) 737 Harrison empty plot
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(10) Stillman under Freeway ten empty boxes
(1) 93-99 Stillman empty plot
(1) 87-91 Stillman empty plot
(1) 51 Stillman across street empty plot
(3) 39 Stillman three empty plots

(1) 439 Bryant empty plot
(1) 551 3rd Street plot with stump
(1) 599 3rd Street empty plot on Brannan side of the property
(1) 366 Brannan empty plot
(1) 45 South Park empty plot
(1) 35 South Park empty plot
(1) 1 South Park empty plot
(1) 22 South Park empty plot
(1) 525-2nd Street empty plot
333 Brannan planter beds no trees
(5) 180 Brannan 1 with stump
(2) 570 Beale two empty plots
(1) 501 Beale across the street empty plot
(1) 500 Beale empty plot
(1) 500-599 Beale on Delancey side of the property empty plot
(2) 540 Delancey two empty plots
(6) 1 Federal 6 missing trees on both sides of the street
(2) 355 Bryant two empty plots
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(7) 487 Harrison seven beds without trees
(1) 201C Harrison with stump
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(1) 360 Spear empty plot
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(1) 297 Kansas Street empty plot
(1) 251 Rhode Island plot with stump
(16) 151 Hopper 15 empty planter boxes and empty plot
(1) 1001-16th Street empty plot
(2) 900-16th Street across on 7th Street side of the property two empty plots
(1) 900-16th Street across street empty plot
(15) 24 Willie Mays Place fifteen empty planter boxes
(1) 301-251 King empty plot
(1) 360 Berry empty plot
(1) 298 King Street on Townsend side of the property empty plot
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(55) 24-185 King Street fifty-five planter boxes with no trees
(2) 701-2nd Street two empty plots
(1) 88 Townsend St empty plot
(1) 64 Townsend St empty plot
(2) 2 Townsend St on Colin Kelly Jr side of the property two empty plots
(3) 2 Townsend on Townsend three empty plots
(3) 600 Embarcadero 1 empty plot and two with stumps
(1) 699 Delancy empty plot
(1) 650 Delancy empty plot
(2) 4 Bayside Village one empty plot and one with stump
(2) 400 Beale two empty plots
+ 375 Beale with multi planter beds empty
(1) 333 Beale empty plot

(1) Steuart and Market Streets palm tree cut in half

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https://sanfranciscotreecampaign.blogspot.com

South of Market Tree Survey
March - April 2026 spring break

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(1) 43-50-12th Street empty plot with stump
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(1) 851 Minna empty plot
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(2) 547 Natoma empty plot

One empty plot on Russ side of the property
(1) 50 Russ empty plot
(3) 51-55 Russ three empty plots
(2) 537 Natoma two plots with stumps
(1) 515 Natoma empty plot
(1) 522-524 Natoma empty plot
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(1) 1061 Folsom empty plot
(1) 1067 Folsom empty plot
(1) 56 Moss empty plot
(1) 10 Moss empty plot
(1) 1097 Howard empty plot
(2) 1026 Howard on Harriet side of the property two empty plots

(1) 80 Harriet empty plot
(1) 1068 Folsom empty plot on Harrison side of property
(1) 101 Columbia plot with stump on Folsom side of the property
(1) 1001 Folsom plot with stump
(1) 301-6th Street empty plot on Shipley side of the property
(1) 275-6th Street empty plot on Clementina side of property
(2) 426 Clementina two empty plots
(1) 436 Clementina empty plot
(3) 400 Clementina two empty plots
One empty plot on Tehama side of the property
(3) 927 Howard three empty planters boxes one with dead tree
(1) 888 Howard empty plot on 5th Street side of the property
(1) 353 Clementina empty plot
(2) 360 Clementina two empty plots
(2) 868 Folsom on Clementina side of the property two empty plots
(2) 383 Tehama two empty plots
(1) 851 Howard on Tehama side of property one empty plot
(2) 300-4th Street one empty plot
One no tree in plot on Folsom side of the property
(5) 360-4th Street Five on Shipley side of the property
(1) 747 Folsom empty plot
(1) 637 Howard empty plot
(1) 650 Folsom empty plot
(1) 608 Folsom empty plot
(1) 600 Harrison empty plot on 2nd Street side of the property
(2) 239-1st Street two empty plots on Tehama side of the property
(2) 500 Folsom two empty plots on Clementina side of the property
(2) 19 Clementina empty plots with stumps
(1) 255-1st Street empty plot
(1) 250 Howard empty plot
(1) 2 Rincon Place empty plot with stump
(1) 201 Folsom empty pot with stump
(1) 250 Embarcadero empty plot
(1) 1 Steuart Lane one empty planter box
(2) 88 Howard two empty plots with stumps
(4) 450 -10th Street three empty plots
1 empty plot on Harrison side of the property with stump
(1) 1240 Bryant empty plot
(1) 590-10th Street empty plot on Division side of the property
(1) 1555 Bryant empty plot
(1) 1174 Bryant empty plot
(1) 264 Dore empty plot
(1) 233-235 Dore empty plot
(1) 455-9th Street plot with stump
(1) 407 9th Street empty plot
(1) 25A McLean empty plot

(1) 1108 Bryant empty plot
(1) 1000 Brannan empty plot
(2) 555-9th Street empty plot
(10 1070 Bryant empty plot
(1) 468-8th Street empty plot
(5+) 345-9th Street two empty plots
Three empty plots on Ringold side of the property
1 large bed on Gordon side of the property
(1+) 1222 Harrison multi planter beds missing trees
(2) 305 Langton empty plot
(5) 945 Bryant Five empty plots
(1) 975 Bryant empty planter pot
(1) 41 Decatar empty plot
(1) 57-59 Gilbert empty plot with wooden fence on 2 sides of the plot
(4) 18 Sherman Street on Columbia side of the park four empty plots
(2) 85 Columbia two empty plots
(1) 75 Columbia empty plot
(3) 59 Columbia three empty plots
(5) 57 Columbia five empty plots
(2) 1020 Harrison St on Columbia side of the property two empty plots
(3) 1000 Harrison St on 6th Street side of the property empty plot
2 empty planters
(1) 1001 Harrison on 6th Street side of the property empty plot
(1) 475-6th Street empty plot
(3) 750 Bryant on Oak side of the property three empty plots
(2) 701 Bryant two empty plots
(2) 673 Brannan 1 empty plot and 1 with stump
(2) 651 Brannan two empty plots
(1) 601 Brannan empty plot on 5th Street side of the property
(4) 655-695 5th Street four empty plots
(1) 633 Bryant with stump on Freelon side of the property
(1) 132-134 Freelon empty plot
(1) 114 Freelon empty plot
(1) 230 Ritch empty plot
(5) 475-4th Street Five empty plots
(1) 737 Harrison empty plot
(2) 88 Perry Street two empty plots
(10) Stillmon under Freeway ten empty boxes
(1) 93-99 Stillman empty plot
(1) 87-91 Stillman empty plot
(1) 51 Stillman across street empty plot
(3) 39 Stillman three empty plots
(1) 439 Bryant empty plot
(1) 551 3rd Street plot with stump
(1) 599 3rd Street empty plot on Brannan side of the property
(1) 366 Brannan empty plot

(1) 45 South Park empty plot
(1) 35 South Park empty plot
(1) 1 South Park empty plot
(1) 22 South Park empty plot
(1) 525-2nd Street empty plot
333 Brannan planter beds no trees
(5) 180 Brannan 1 with stump
(2) 570 Beale two empty plots
(1) 501 Beale across the street empty plot
(1) 500 Beale empty plot
(1) 500-599 Beale on Delancy side of the property empty plot
(2) 540 Delency two empty plots
(6) 1 Federal 6 missing trees on both sides of the street
(2) 355 Bryant two empty plots
(1) 333 Bryant empty plot
(7) 487 Harrison seven beds without trees
(1) 201C Harrison with stump
(2) 1 Harrison on Embarcadero side of the property two empty beds with no trees
(1) 360 Spear empty plot
(1) 1700 Harrison on Division side of the property plot with stump
(1) 150 Division on Vermont side of the property empty plot
(1) 297 Kansas Street empty plot
(1) 251 Rhode Island plot with stump
(16) 151 Hopper 15 empty planter boxes and empty plot
(1) 1001-16th Street empty plot
(2) 900-16th Street across on 7th Street side of the property two empty plots
(1) 900-16th Street across street empty plot
(15) 24 Willie Mays Place fifteen empty planter boxes
(1) 301-251 King empty plot
(1) 360 Berry empty plot
(1) 298 King Street on Townsend side of the property empty plot
(1) 260 Townsend on Lusk side of the property empty plot
(55) 24-185 King Street fifty-five planter boxes with no trees
(2) 701-2nd Street two empty plots
(1) 88 Townsend St empty plot
(1) 64 Townsend St empty plot
(2) 2 Townsend St on Colin Kelly Jr side of the property two empty plots
(3) 2 Townsend on Townsend three empty plots
(3) 600 Embarcadero 1 empty plot and two with stumps
(1) 699 Delancy empty plot
(1) 650 Delancy empty plot
(2) 4 Bayshide Village one empty plot and one with stump
(2) 400 Beale two empty plots
+ 375 Beale with multi planter beds empty
(1) 333 Beale empty plot
(1) Steuart and Market Streets palm tree cut in half

THE ABOVE SURVEY IS THE PROPERTY OF: SAN FRANCISCO TREE CAMPAIGN

From:	Board of Supervisors (BOS)
To:	BOS-Supervisors; BOS-Legislative Aides
Cc:	Calvillo, Angela (BOS); Mchugh, Eileen (BOS); Ng, Wilson (BOS); Somera, Alisa (BOS); De Asis, Edward (BOS); BOS-Operations; Board of Supervisors (BOS); Carroll, John (BOS)
Subject:	FW: Opposition to the proposed street tree legislation changes - File 251211
Date:	Friday, April 3, 2026 10:02:40 AM

Dear Supervisors,

Please see below from Anastasia Glikshtern regarding:

> File No. 251211 - Ordinance amending the Public Works Code to allow development projects to satisfy street tree planting requirements through payment of an in lieu fee or providing alternative landscaping; exempt accessory dwelling units from street tree planting requirements; eliminate appeals to the Board of Appeals for tree removals undertaken by City departments and commissions; and update in lieu fee reporting requirements; amending the Administrative Code to create a separate account within the Adopt-A-Tree Fund to receive in lieu fees for street tree requirements; amending the Planning Code to update street tree applicability requirements; affirming the Planning Department's determination under the California Environmental Quality Act; making findings of consistency with the General Plan, and the eight priority policies of Planning Code, Section 101.1; and making public necessity, convenience, and welfare findings under Planning Code, Section 302.

Regards,

Richard Lagunte
Office of the Clerk of the Board
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
Voice (415) 554-5184 | Fax (415) 554-5163
bos@sfgov.org | www.sfbos.org

Pronouns: he, him, his

Disclosures: *Personal information that is provided in communications to the Board of Supervisors is subject to disclosure under the California Public Records Act and the San Francisco Sunshine Ordinance. Personal information provided will not be redacted. Members of the public are not required to provide personal identifying information when they communicate with the Board of Supervisors and its committees. All written or oral communications that members of the public submit to the Clerk's Office regarding pending legislation or hearings will be made available to all members of the public for inspection and copying. The Clerk's Office does not redact any information from these submissions. This means that personal information—including names, phone numbers, addresses and similar information that a member of the public elects to submit to the Board and its committees—may appear on the Board of Supervisors' website or in other public documents that members of the public may inspect or copy.*

From: Anastasia Glikshtern <apglikshtern@gmail.com>
Sent: Friday, March 27, 2026 1:39 PM
To: Carroll, John (BOS) <john.carroll@sfgov.org>; ChenStaff <ChenStaff@sfgov.org>; Chen, Chyanne (BOS) <Chyanne.Chen@sfgov.org>; Mahmood, Bilal (BOS) <bilal.mahmood@sfgov.org>; MahmoodStaff <MahmoodStaff@sfgov.org>; Melgar, Myrna (BOS) <myrna.melgar@sfgov.org>
Cc: Sauter, Danny (BOS) <Danny.Sauter@sfgov.org>; MandelmanStaff (BOS) <mandelmanstaff@sfgov.org>; WongStaff (BOS) <WongStaff@sfgov.org>; DorseyStaff (BOS) <DorseyStaff@sfgov.org>; Fielder, Jackie (BOS) <Jackie.Fielder@sfgov.org>; Board of Supervisors (BOS) <board.of.supervisors@sfgov.org>; SherrillStaff <SherrillStaff@sfgov.org>; Walton, Shamann (BOS) <shamann.walton@sfgov.org>
Subject: Opposition to the proposed street tree legislation changes - File 251211

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear members of the Land Use and Transportation Committee,

I **strongly** oppose the proposed street tree legislation changes - they will **harm** San Francisco's already inadequate tree canopy, and **greatly reduce** or, in many cases, **completely remove** oversight and public participation.

I 100% agree with Joshua Klipp's analysis below:

"As written, the proposed legislation will allow developers to choose between planting trees or paying an inadequate in lieu fee. We know the in lieu is inadequate because a nexus study hasn't been conducted for three years, even though City law requires an annual evaluation of this fee. Meanwhile, the costs of labor, materials and fuel for City trucks have skyrocketed. Additionally, this legislation has no check to ensure developers leave sufficient space for future trees to be planted at their sites. Developers will choose the cheap and easy route, and San Francisco's tree canopy will suffer.
As written, the proposed legislation will completely remove the public from even objecting, let alone appealing, to the removal of trees that the City deems "hazardous". While SFPW promises to only use qualified arborists to make these designations, one such arborist recently - *and erroneously* - designated an entire block of trees in Hayes Valley for immediate removal. It was only a massive public outcry that drew attention to the error. If this law passes, mistakes like these are subject to *zero* public oversight. It's also worth noting that, of the 6 hazard tree appeals in the last 6 years, 2 of them were granted by the Board of Appeals. This further undercuts any assertion that SFPW's "hazard" designation is infallible.
As written, the proposed legislation will prevent the public from appealing *any* City-initiated tree removal. This means that City projects which seek to remove hundreds of trees can no longer be appealed. Projects such as: the Van Ness BRT, the Geary Boulevard BRT, the Folsom / Howard Bike Lane and Streetscape projects - these would no longer be subject to review by the Board of Appeals. Notably, the Board of

Appeals - who was not consulted about this proposed change to their jurisdiction - has expressed serious concerns about this amendment.
Even if appeals are limited to 30 days, this effectively renders the appeals process meaningless. Appellants cannot obtain records in time for briefing schedules, and the City can force hearings before a Board of Appeals that does not have all the facts. And while City Officials claim that tree permit appeals slow down projects, they have yet to cite a single example of this in the many news articles and public meetings regarding these proposed amendments.
San Francisco has the smallest tree canopy of any major City in the United States. We have already failed the tree planting goals set out in the 2014 Urban Forest Plan. And now we are thousands of trees behind our tree planting goals in the 2021 Climate Action Plan - a plan created in response to the Declaration that we are in a Climate Emergency. Now is not the time to be playing games with tree planting, oversight and public engagement. **Now is the time to invest in our trees and green infrastructure, and to partner with the community who so desperately wants to make San Francisco healthy, green and resilient for generations to come."**

Thank you,
Anastasia Glikshtern
1683 34th Ave.,
San Francisco, CA 94122

From:	Rk Bose
To:	Melgar, Myrna (BOS); MahmoodStaff; Mahmood, Bilal (BOS); Carroll, John (BOS)
Subject:	Proposed street tree legislation changes
Date:	Tuesday, March 31, 2026 9:07:40 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear members of the Land Use and Transportation Committee,

I am writing to oppose the proposed street tree legislation changes, File 251211.

My main objections:

1) In lieu fees are meaningless. To project managers, they are a trivial cost of doing business, and not a deterrent. In the hands of the administration, they are easily deployed in other ways than planting trees.

San Francisco has destroyed hundreds of trees in its parks and streets in the past twenty years, and it has the lowest canopy cover of any major US city. Every major project, private or public, seems to start with tree removal. The rate of replanting has not kept us. There is no reason to believe it will do so now.

2) Reducing oversight and public participation is undemocratic and counter-productive. People have an attachment to trees, and should have a voice in removal plans. Moreover, city trees have enormous social and environmental benefits. Too often, project managers treat them as obstacles.

"*The tree which moves some to tears of joy is in the eyes of others only a green thing that stands in the way.*"
– *William Blake,* The Letters*, 1799*

Sincerely,

Rupa Bose

San Francisco

From: Leah Edwards
To: Melgar, Myrna (BOS); ChenStaff; MahmoodStaff; Chen, Chyanne (BOS); Mahmood, Bilal (BOS)
Cc: Carroll, John (BOS)
Subject: Protect our Trees: Oppose File 251211
Date: Monday, March 30, 2026 8:02:34 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Supervisors Melgar, Chen and Mahmood,

I urge you to vote no on File 251211. San Francisco already has the smallest tree canopy of any major U.S. city and is thousands of trees behind our 2021 Climate Action Plan targets.

This legislation makes three problems worse:

1. It eliminates public review of tree removals. An arborist recently designated an entire block of healthy Hayes Valley trees for immediate removal; only public outcry caught the mistake. Two of the last six hazard-tree appeals were granted by the Board of Appeals. This bill removes the only safeguard against errors like these.

2. It lets developers pay to skip planting, at a bargain price. The in-lieu fee hasn't had the legally required nexus study in three years, even as costs have soared. There's no requirement for Developers to even leave space for future trees. Developers will always take the cheapest path.

3. It bars the public from appealing any City-initiated tree removal. Projects like Van Ness BRT, Geary BRT, and Folsom/Howard, which propose removing hundreds of trees, would face zero oversight. The Board of Appeals was never consulted about losing this jurisdiction, and has raised serious concerns. Officials claim appeals cause delays but haven't cited a single example.

Now is not the time to weaken tree protections and shut the public out. I urge you to reject this legislation.

Best,
Leah

From:	Kasey Rios Asberry
To:	Mahmood, Bilal (BOS); Chen, Chyanne (BOS); Melgar, Myrna (BOS)
Cc:	MahmoodStaff; ChenStaff; Carroll, John (BOS); MandelmanStaff (BOS); Lamarre, Julie (BOA)
Subject:	Re: Tree Legislation before Land Use & Transportation Committee
Date:	Saturday, March 28, 2026 8:26:41 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Supervisors on the Land Use & Transportation Committee: Supervisors Melgar, Chen and Mahmood,

This letter voices strong opposition to File 25121, likely considered by you soon. This is proposed legislation that would_doubly_, further reduce SF's meager urban forest canopy AND negate public oversight processes; a two-pronged assault both on environmental health and civic health.

Instead of false "streamlining" (steam_rolling_) SF's often demonstrated public will towards more trees and more community oversight we should be investing in:

- effective monitoring of trees as required by law
- timely reporting on progress toward the mandated increases in canopy (conserving, planting, maintaining)
- punitive damages to scofflaws both inside and outside the City "families" agencies at a meaningful scale

Developers should not be able to continue to degrade SF's faltering green infrastructure in the name of vague hand-waving towards building the city tax base. Planners must prioritize the City's lung power for people in rich & poor neighborhoods alike or we will not be able to sustain the growth that is hoped for.

Instead we should
- Appoint public officials who believe in following the electorate's expressed will
- Act like we understand that everybody deserves access to Nature in the city of St Francis

Your ruling to stop this canopy-withering legislation as written, to use whatever means you have to enhance public participation rather inhibit it, to influence colleagues on the Board of Supervisors to initiate and support legislation that always includes meaningful channels of public reporting and community influence - is the smart and healthy direction to take.

We are all depending on you for this important work.

Sincerely yours in this work,

Kasey Rios
>>>><><<<<
Demonstration Gardens
Tenderloin Peoples Congress Environmental Justice Committee

>>>><<<<

From:	cala mario
To:	Carroll, John (BOS); ChenStaff; Melgar, Myrna (BOS); MahmoodStaff; MahmoodStaff; DorseyStaff (BOS); DorseyStaff (BOS); Lurie, Daniel (MYR); Lurie, Daniel (MYR)
Subject:	oppose #251211
Date:	Friday, March 27, 2026 10:39:55 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Supervisors Melgar, Chen and Mahmood,

I'm writing to express my strong opposition to File 251211 - the proposed street tree legislation changes that will harm San Francisco's already puny tree canopy, and reduce oversight and public participation.

As written, the proposed legislation will allow developers to choose between planting trees or paying an inadequate in lieu fee. We know the in lieu is inadequate because a nexus study hasn't been conducted for three years, even though City law requires an annual evaluation of this fee. Meanwhile, the costs of labor, materials and fuel for City trucks have skyrocketed. Additionally, this legislation has no check to ensure developers leave sufficient space for future trees to be planted at their sites. Developers will choose the cheap and easy route, and San Francisco's tree canopy will suffer.

As written, the proposed legislation will completely remove the public from even objecting, let alone appealing, to the removal of trees that the City deems "hazardous". While SFPW promises to only use qualified arborists to make these designations, one such arborist recently - and erroneously - designated an entire block of trees in Hayes Valley for immediate removal. It was only a massive public outcry that drew attention to the error. If this law passes, mistakes like these are subject to zero public oversight. It's also worth noting that, of the 6 hazard tree appeals in the last 6 years, 2 of them were granted by the Board of Appeals. This further undercuts any assertion that SFPW's "hazard" designation is infallible.

As written, the proposed legislation will prevent the public from appealing any City-initiated tree removal. This means that City projects which seek to remove hundreds of trees can no longer be appealed. Projects such as: the Van Ness BRT, the Geary Boulevard BRT, the Folsom / Howard Bike Lane and Streetscape projects - these would no longer be subject to review by the Board of Appeals. Notably, the Board of Appeals - who was not consulted about this proposed change to their jurisdiction - has expressed serious concerns about this amendment.

Even if appeals are limited to 30 days, this effectively renders the appeals process meaningless. Appellants cannot obtain records in time for briefing schedules, and the City can force hearings before a Board of Appeals that does not have all the facts. And while City Officials claim that tree permit appeals slow down projects, they have yet to cite a single example of this in the many news articles and public meetings regarding these proposed amendments.

San Francisco has the smallest tree canopy of any major City in the United States. We have already failed the tree planting goals set out in the 2014 Urban Forest Plan. And now we are thousands of trees behind our tree planting goals in the 2021 Climate Action Plan - a plan created in response to the Declaration that we are in a Climate Emergency. Now is not the time to be playing games with tree planting, oversight and public engagement. Now is the time to invest in our trees and green infrastructure, and to partner with the community who so desperately wants to make San Francisco healthy, green and resilient for generations to come.
Sincerely,
Marilyn Ho

From:	Anastasia Glikshtern
To:	Carroll, John (BOS); ChenStaff; Chen, Chyanne (BOS); Mahmood, Bilal (BOS); MahmoodStaff; Melgar, Myrna (BOS)
Cc:	Sauter, Danny (BOS); MandelmanStaff (BOS); WongStaff (BOS); DorseyStaff (BOS); Fielder, Jackie (BOS); Board of Supervisors (BOS); SherrillStaff; Walton, Shamann (BOS)
Subject:	Opposition to the proposed street tree legislation changes - File 251211
Date:	Friday, March 27, 2026 1:39:24 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear members of the Land Use and Transportation Committee,

I **strongly** oppose the proposed street tree legislation changes - they will **harm** San Francisco's already inadequate tree canopy, and **greatly reduce** or, in many cases, **completely remove** oversight and public participation.

I 100% agree with Joshua Klipp's analysis below:

"As written, the proposed legislation will allow developers to choose between planting trees or paying an inadequate in lieu fee. We know the in lieu is inadequate because a nexus study hasn't been conducted for three years, even though City law requires an annual evaluation of this fee. Meanwhile, the costs of labor, materials and fuel for City trucks have skyrocketed. Additionally, this legislation has no check to ensure developers leave sufficient space for future trees to be planted at their sites. Developers will choose the cheap and easy route, and San Francisco's tree canopy will suffer.

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As written, the proposed legislation will prevent the public from appealing *any* City-initiated tree removal. This means that City projects which seek to remove hundreds of trees can no longer be appealed. Projects such as: the Van Ness BRT, the Geary Boulevard BRT, the Folsom / Howard Bike Lane and Streetscape projects - these would no longer be subject to review by the Board of Appeals. Notably, the Board of Appeals - who was not consulted about this proposed change to their jurisdiction - has expressed serious concerns about this amendment.

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Thank you,

Anastasia Glikshtern
1683 34th Ave.,
San Francisco, CA 94122

From: SF Forest
To: Melgar, Myrna (BOS); ChenStaff; Chen, Chyanne (BOS); MahmoodStaff; Mahmood, Bilal (BOS); Carroll, John (BOS)
Subject: Opposition to the proposed street tree legislation changes - File 251211
Date: Friday, March 27, 2026 1:23:07 PM
Attachments: image.png

This message is from outside the City email system. Do not open links or attachments from untrusted sources.



Dear members of the Land Use and Transportation Committee,

San Francisco Forest Alliance **strongly** opposes the proposed street tree legislation changes, File 251211. The changes will harm San Francisco's already inadequate tree canopy, and **severely reduce or completely remove** oversight and public participation. We totally agree with Joshua Klipp's analysis below:

"As written, the proposed legislation will allow developers to choose between planting trees or paying an inadequate in lieu fee. We know the in lieu is inadequate because a nexus study hasn't been conducted for three years, even though City law requires an annual evaluation of this fee. Meanwhile, the costs of labor, materials and fuel for City trucks have skyrocketed. Additionally, this legislation has no check to ensure developers leave sufficient space for future trees to be planted at their sites. Developers will choose the cheap and easy route, and San Francisco's tree canopy will suffer.

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Sincerely,
San Francisco Forest Alliance

San Francisco Forest Alliance is a 501(c)4 not-for-profit organization with a mission of **inclusive environmentalism**. We fight to protect our environment through outreach and providing information. We oppose the unnecessary destruction of trees, oppose the use of toxic herbicides in parks and public lands, and support public access to our parks and conservation of our tree canopy. We stand for transparency in the use of public funds.

From:	anastasia Yovanopoulos
To:	Melgar, Myrna (BOS); ChenStaff; Chen, Chyanne (BOS); MahmoodStaff; Mahmood, Bilal (BOS); Carroll, John (BOS)
Subject:	Vote NO on Proposed Street Tree Removal Changes
Date:	Friday, March 27, 2026 12:14:52 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Supervisors Melgar, Chen and Mahmood,

I'm writing to express my strong opposition to File 251211 - the proposed street tree legislation changes that will harm San Francisco's already puny tree canopy, and reduce oversight and public participation.

As written, the proposed legislation will allow developers to choose between planting trees or paying an inadequate in lieu fee. We know the in lieu is inadequate because a nexus study hasn't been conducted for three years, even though City law requires an annual evaluation of this fee. Meanwhile, the costs of labor, materials and fuel for City trucks have skyrocketed. Additionally, this legislation has no check to ensure developers leave sufficient space for future trees to be planted at their sites. Developers will choose the cheap and easy route, and San Francisco's tree canopy will suffer.

- As written, the proposed legislation will completely remove the public from even objecting, let alone appealing, to the removal of trees that the City deems "hazardous".
- As written, the proposed legislation means will prevent the public from appealing *any* City-initiated tree removal. This that City projects which seek to remove hundreds of trees can no longer be appealed. Projects such as: the Van Ness BRT, the Geary Boulevard BRT, the Folsom / Howard Bike Lane and Streetscape projects - these would no longer be subject to review by the Board of Appeals. Notably, the Board of Appeals - who was not consulted about this proposed change to their jurisdiction - has expressed serious concerns about this amendment.

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green infrastructure, and to partner with the community who so desperately wants to make San Francisco healthy, green and resilient for generations to come.

Sincerely,
Anastasia Yovanopoulos
D#8 resident

From: MELINDA MacNaughton
To: ChenStaff; Melgar, Myrna (BOS); MahmoodStaff; Mahmood, Bilal (BOS); Carroll, John (BOS)
Subject: strong opposition to File 251211
Date: Tuesday, March 24, 2026 8:33:05 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Land Use Transportation Committee
Dear Supervisors Melgar, Chen and Mahmood,
I'm writing to express my strong opposition to File 251211 - the proposed street tree legislation will harm San Francisco's already small tree canopy, and reduce oversight and public participation.
This comes at a time when city tree canopy is **extremely important as the climate heats up** to protect residents and microclimates/ecosystems from drying out and heating up. **The global recommendation for city tree canopy is 30% coverage. See link here. A recent study in Austrailia recommends 40%.** Many cities like Carmel and Pacific Grove take good care to protect their trees for this reason and for habitat protection. San Francisco should lead this effort. The founders of the city planned out tree coverage well especially in parks and this should not be negated.
As written, the proposed legislation will allow developers to choose between planting trees or paying an inadequate in lieu fee. This legislation has no check to ensure developers leave sufficient space for future trees to be planted at their sites. Developers will choose the cheap and easy route, and San Francisco's tree canopy will suffer. **It makes one wonder if developers are behind this legislation.**
As written, the proposed legislation will completely remove the public from even objecting, let alone appealing, to the removal of trees that the City deems "hazardous".
As written, the proposed legislation will prevent the public from appealing *any* City-initiated tree removal. The Board of Appeals - who was not consulted about this proposed change to their jurisdiction - has expressed serious concerns about this amendment. Even if appeals are limited to 30 days, this effectively renders the appeals process meaningless.
San Francisco has the smallest tree canopy of any major City in the United States. We have already failed the tree planting goals set out in the 2014 Urban Forest Plan. And now we are thousands of trees behind our tree planting goals in the 2021 Climate Action Plan - a plan created in response to the Declaration that we are in a Climate Emergency. Now is not the time to be playing games with tree planting, oversight and public engagement. **Now is the time to invest in our trees and green infrastructure, and to partner with the community who so desperately wants to make San Francisco healthy, green and resilient for generations to come. Climate change mitigation should be a priority not developers needs. Please listen to the people and fix this legislation to protect and add trees.**
Thank you,
Melinda MacNaughton

From:	Anna Papitto
To:	Melgar, Myrna (BOS); ChenStaff; Chen, Chyanne (BOS); MahmoodStaff; Mahmood, Bilal (BOS); Carroll, John (BOS)
Subject:	Opposed to File 251211
Date:	Tuesday, March 24, 2026 6:20:29 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Supervisors Melgar, Chen and Mahmood,

I'm writing to express my strong opposition to File 251211 - the proposed street tree legislation changes that will harm San Francisco's already puny tree canopy, and reduce oversight and public participation.

As written, the proposed legislation will allow developers to choose between planting trees or paying an inadequate in lieu fee. We know the in lieu is inadequate because a nexus study hasn't been conducted for three years, even though City law requires an annual evaluation of this fee. Meanwhile, the costs of labor, materials and fuel for City trucks have skyrocketed. Additionally, this legislation has no check to ensure developers leave sufficient space for future trees to be planted at their sites. Developers will choose the cheap and easy route, and San Francisco's tree canopy will suffer.

As written, the proposed legislation will completely remove the public from even objecting, let alone appealing, to the removal of trees that the City deems "hazardous". While SFPW promises to only use qualified arborists to make these designations, one such arborist recently - *and erroneously* - designated an entire block of trees in Hayes Valley for immediate removal. It was only a massive public outcry that drew attention to the error. If this law passes, mistakes like these are subject to *zero* public oversight. It's also worth noting that, of the 6 hazard tree appeals in the last 6 years, 2 of them were granted by the Board of Appeals. This further undercuts any assertion that SFPW's "hazard" designation is infallible.

As written, the proposed legislation will prevent the public from appealing *any* City-initiated tree removal. This means that City projects which seek to remove hundreds of trees can no longer be appealed. Projects such as: the Van Ness BRT, the Geary Boulevard BRT, the Folsom / Howard Bike Lane and Streetscape projects - these would no longer be subject to review by the Board of Appeals. Notably, the Board of Appeals - who was not consulted about this proposed change to their jurisdiction - has expressed serious concerns about this amendment.

Even if appeals are limited to 30 days, this effectively renders the appeals process meaningless. Appellants cannot obtain records in time for briefing schedules, and the City can force hearings before a Board of Appeals that does not have all the facts. And while City Officials claim that tree permit appeals slow down projects, they have yet to cite a single example of this in the many news articles and public meetings regarding these proposed amendments.

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Thank you for reading,
Anna, Noe Valley, SF

--
Anna Papitto (she)
Software Engineer at Google
Artist

From: Jamie Sheldon
To: Carroll, John (BOS)
Subject: Elimination of Trees
Date: Tuesday, March 24, 2026 1:56:23 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Mr. Carroll,
I'm writing to express my strong opposition to File 251211 - the proposed street tree legislation changes that will harm San Francisco's already puny tree canopy, and reduce oversight and public participation.

As written, the proposed legislation will allow developers to choose between planting trees or paying an inadequate in lieu fee. We know the in lieu is inadequate because a nexus study hasn't been conducted for three years, even though City law requires an annual evaluation of this fee. Meanwhile, the costs of labor, materials and fuel for City trucks have skyrocketed. Additionally, this legislation has no check to ensure developers leave sufficient space for future trees to be planted at their sites. Developers will choose the cheap and easy route, and San Francisco's tree canopy will suffer.

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Reply

From: Natalia Peschiera
To: Carroll, John (BOS)
Subject: Opposition to File 251211
Date: Tuesday, March 24, 2026 1:17:31 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Mr. Carroll,

I'm writing to express my strong opposition to File 251211 - The proposed street tree legislation changes that will harm San Francisco's already puny tree canopy, and reduce oversight and public participation.

As written, the proposed legislation will allow developers to choose between planting trees or paying an inadequate in lieu fee. We know the in lieu is inadequate because a nexus study hasn't been conducted for three years, even though City law requires an annual evaluation of this fee. Meanwhile, the costs of labor, materials and fuel for City trucks have skyrocketed. Additionally, this legislation has no check to ensure developers leave sufficient space for future trees to be planted at their sites. Developers will choose the cheap and easy route, and San Francisco's tree canopy will suffer.

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Please oppose this legislation.

Thank you for your attention.

Kind regards,

Natalia Peschiera, a committed volunteer with Mission Verde community watering effort and Mission district resident

From: Don Bliss
To: Carroll, John (BOS)
Subject: Proposed Street Tree Legislation
Date: Tuesday, March 24, 2026 12:31:46 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

To the Members of the Land Use Transporation Committee:

I am writing to express my strongest opposition to the Mayor's recent proposals.

The City and its residents should be in charge of where and when trees are planted and removed, NOT developers, who often have no connection to the City whatsoever and no commitment to the quality of life here for ALL residents.

This proposal was not well considered. For one example, the proposed fee-in-lieu-of: How was that amount determined? How will it be spent? There is NOTHING in the proposal addressing those questions.

Please do not pass this proposal. Reconsidered and redrafted instead of in haste, changes to current regulations could be beneficial, but as written this law is not in the best interests of the residents of San Francisco.

Thank you.

Regards,

Donald C. Bliss
District 8 Resident

"Imperfection is beauty, madness is genius, and it's better to be absolutely ridiculous than absolutely boring." ~ Marilyn Monroe -
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From:	Leo Goodyear
To:	Melgar, Myrna (BOS); ChenStaff; Chen, Chyanne (BOS); MahmoodStaff; Mahmood, Bilal (BOS); Carroll, John (BOS)
Subject:	Opposition to File 251211
Date:	Tuesday, March 24, 2026 11:34:49 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Supervisors Melgar, Chen and Mahmood,

I'm writing to express my strong opposition to File 251211 - the proposed street tree legislation changes that will harm San Francisco's already puny tree canopy, and reduce oversight and public participation.

As written, the proposed legislation will allow developers to choose between planting trees or paying an inadequate in lieu fee. We know the in lieu is inadequate because a nexus study hasn't been conducted for three years, even though City law requires an annual evaluation of this fee. Meanwhile, the costs of labor, materials and fuel for City trucks have skyrocketed. Additionally, this legislation has no check to ensure developers leave sufficient space for future trees to be planted at their sites. Developers will choose the cheap and easy route, and San Francisco's tree canopy will suffer.

As written, the proposed legislation will completely remove the public from even objecting, let alone appealing, to the removal of trees that the City deems "hazardous". While SFPW promises to only use qualified arborists to make these designations, one such arborist recently - *and erroneously* - designated an entire block of trees in Hayes Valley for immediate removal. It was only a massive public outcry that drew attention to the error. If this law passes, mistakes like these are subject to *zero* public oversight. It's also worth noting that, of the 6 hazard tree appeals in the last 6 years, 2 of them were granted by the Board of Appeals. This further undercuts any assertion that SFPW's "hazard" designation is infallible.

As written, the proposed legislation will prevent the public from appealing *any* City-initiated tree removal. This means that City projects which seek to remove hundreds of trees can no longer be appealed. Projects such as: the Van Ness BRT, the Geary Boulevard BRT, the Folsom / Howard Bike Lane and Streetscape projects - these would no longer be subject to review by the Board of Appeals. Notably, the Board of Appeals - who was not consulted about this proposed change to their jurisdiction - has expressed serious concerns about this amendment.

Even if appeals are limited to 30 days, this effectively renders the appeals process meaningless. Appellants cannot obtain records in time for briefing schedules, and the City can force hearings before a Board of Appeals that does not have all the facts. And while City Officials claim that tree permit appeals slow down projects, they have yet to cite a single example of this in the many news articles and public meetings regarding these proposed amendments.

San Francisco has the smallest tree canopy of any major City in the United States. We have already failed the tree planting goals set out in the 2014 Urban Forest Plan. And

now we are thousands of trees behind our tree planting goals in the 2021 Climate Action Plan - a plan created in response to the Declaration that we are in a Climate Emergency. Now is not the time to be playing games with tree planting, oversight and public engagement. **Now is the time to invest in our trees and green infrastructure, and to partner with the community who so desperately wants to make San Francisco healthy, green and resilient for generations to come.**

Sincerely,

Leo Goodyear, SF resident

From:	Robert Hall
To:	Melgar, Myrna (BOS); ChenStaff; Chen, Chyanne (BOS); MahmoodStaff; Mahmood, Bilal (BOS); Carroll, John (BOS)
Subject:	OPPOSE File 251211 — The People Are Watching!
Date:	Tuesday, March 24, 2026 10:22:35 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Members of the Land Use Committee,

I am writing in strong opposition to File 251211, the proposed street tree legislation that would gut San Francisco's already skeletal tree canopy and — just as critically — strip residents of their right to participate in decisions about their own neighborhoods.

Let me be direct: this legislation is being written for developers and City bureaucracies, not for the people of San Francisco. And the people of San Francisco — along with people across this country — are waking up to exactly that kind of arrangement. The era of insiders rigging the rules for corporations, cutting out community input, and trusting that residents won't notice? That era is over.

File 251211 offers developers a choice between planting trees or paying an in-lieu fee — a fee that hasn't been recalibrated by the required nexus study in three years, even as the costs of labor, materials, and fuel for City trucks have skyrocketed. You don't need a consultant to tell you what happens next: developers take the cheap way out, the fee doesn't cover actual costs, and San Francisco's tree canopy continues to shrink. There is also no mechanism in this legislation to ensure developers leave adequate space for future tree planting. This is a giveaway dressed up as policy.

This city already has the smallest tree canopy of any major city in the United States. We have already failed the planting targets set in the 2014 Urban Forest Plan. We are now thousands of trees behind our goals under the 2021 Climate Action Plan — a plan born from our own Declaration of a Climate Emergency. This is not a time for half-measures that benefit the few at the expense of the many.

But the threat to our trees is only part of the story. What this legislation does to public participation is an affront to democratic governance.

File 251211 would completely remove the public's ability to object to — let alone appeal — the removal of trees the City designates as "hazardous." We are told to simply trust that City arborists never make mistakes. But they do. Recently, an entire block of trees in Hayes Valley was erroneously flagged for immediate removal by one such arborist. It took a massive public outcry to correct the error. Under this legislation, that outcry would have no legal standing. It's also worth noting that 2 of the last 6 hazard tree appeals — one in three — were granted by the Board of Appeals. That is not an infallible track record. That is a system that depends on checks and balances to function.

This legislation would further prevent any public appeal of City-initiated tree removals. That means large-scale projects — like the Van Ness BRT, the Geary Boulevard BRT, and the Folsom/Howard Bike Lane projects, which together removed hundreds of trees — would face zero independent review. Remarkably, the Board of Appeals itself was never consulted about this change to its own jurisdiction, and has since raised serious concerns. When you are rewriting rules without telling the body most affected, that is not good governance. That is power consolidating itself.

City officials claim that tree permit appeals slow down projects, yet they have not cited a single example of this in any of the many public meetings or news articles surrounding these proposed changes. Not one. The argument is an assertion without evidence, offered to justify eliminating a right that residents have used responsibly and effectively.

The 30-day appeals window being floated makes a mockery of due process. Appellants cannot obtain records in time to meet briefing schedules. The City can force hearings before a Board of Appeals that doesn't yet have the full picture. This is not streamlining — it is designed to make the appeals process fail.

I urge this Committee to read the room — and the country. The political winds are shifting hard against the idea that developers and government agencies should get to make consequential decisions for neighborhoods without meaningful community input. People are angry at systems rigged to benefit those with money and influence. They are looking to their local elected officials to be different — to protect democratic participation, to hold the line on community rights, and to prove that government can actually work for everyone.

San Francisco can be a model for that kind of governance. Or it can pass File 251211 and send the message that even here, the people come last.

I urge you to reject this legislation as written and return to the community with something that actually invests in our urban forest, keeps the public in the process, and treats neighborhoods as partners — not obstacles.

The trees belong to all of us. So does this city.

From: Judy Irving
To: Melgar, Myrna (BOS); ChenStaff; Chen, Chyanne (BOS); MahmoodStaff; Mahmood, Bilal (BOS)
Cc: Carroll, John (BOS)
Subject: Please protect and grow our tree canopy: OPPOSE FILE 251211
Date: Tuesday, March 24, 2026 10:17:28 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Supervisors Melgar, Chen, and Mahmood,

I'm writing to express my strong **opposition to File 251211** - the proposed street tree legislation changes that will harm San Francisco's already pathetic tree canopy, and reduce oversight and public participation.

As written, the proposed legislation will prevent the public from appealing *any* City-initiated tree removal. This means that City projects which seek to remove hundreds of trees can no longer be appealed. Projects such as: the Van Ness BRT, the Geary Boulevard BRT, the Folsom / Howard Bike Lane and Streetscape projects - these would no longer be subject to review by the Board of Appeals. Notably, the Board of Appeals - who was not consulted about this proposed change to their jurisdiction - has expressed serious concerns about this amendment.

San Francisco has the **smallest tree canopy of any major City in the U.S**. We have already failed the tree planting goals set out in the 2014 Urban Forest Plan. And now we are thousands of trees behind our tree planting goals in the 2021 Climate Action Plan - a plan created in response to the Declaration that we are in a Climate Emergency. Now is not the time to be playing games with tree planting, oversight, and public engagement. **Now is the time to invest in our trees and green infrastructure and to partner with the community. Let's make San Francisco healthy, green, and resilient for generations to come.**

The proposed legislation will allow developers to choose between planting trees or paying an inadequate in lieu fee. We know the in lieu is inadequate because a nexus study hasn't been conducted for three years, even though City law requires an annual evaluation of this fee. Meanwhile, the costs of labor, materials and fuel for City trucks have skyrocketed. Additionally, this legislation has no check to ensure developers leave sufficient space for future trees to be planted at their sites. Developers will choose the cheap and easy route, and San Francisco's tree canopy will suffer.

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further undercuts any assertion that SFPW's "hazard" designation is infallible. Even if appeals are limited to 30 days, this effectively renders the appeals process meaningless. Appellants cannot obtain records in time for briefing schedules, and the City can force hearings before a Board of Appeals that does not have all the facts. And while City Officials claim that tree permit appeals slow down projects, they have yet to cite a single example of this in the many news articles and public meetings regarding these proposed amendments.

Judy Irving, Producer/Director, *The Wild Parrots of Telegraph Hill* (canopy dwellers who need more trees!)

From: David Romano
To: ChenStaff; Melgar, Myrna (BOS); MahmoodStaff
Cc: Carroll, John (BOS)
Subject: Opposed to File 251211 - the proposed street tree legislation
Date: Tuesday, March 24, 2026 9:19:01 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Supervisors Melgar, Chen and Mahmood,

I'm writing to express my opposition to File 251211 - the proposed street tree legislation changes that will harm San Francisco's already puny tree canopy, and reduce oversight and public participation.

As written, the proposed legislation will allow developers to choose between planting trees or paying an inadequate in lieu fee. We know the in lieu is inadequate because a nexus study hasn't been conducted for three years, even though City law requires an annual evaluation of this fee. Meanwhile, the costs of labor, materials and fuel for City trucks have skyrocketed. Additionally, this legislation has no check to ensure developers leave sufficient space for future trees to be planted at their sites. Developers will choose the cheap and easy route, and San Francisco's tree canopy will suffer.

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Thank you for your consideration of the above.

David Romano
759 La Playa Street
San Francisco CA 94121

From: Scott Simons
To: Melgar, Myrna (BOS)
Subject: opposition to File 251211
Date: Tuesday, March 24, 2026 9:07:28 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Supervisor,

I'm writing to express my strong opposition to File 251211 - the proposed street tree legislation changes that will harm San Francisco's already puny tree canopy, and reduce oversight and public participation.

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time to be playing games with tree planting, oversight and public engagement. **Now is the time to invest in our trees and green infrastructure, and to partner with the community who so desperately wants to make San Francisco healthy, green and resilient for generations to come.**

I am sure everyone reading this email knows the story of Easter Island, but just in case you forgot, please do not repeat this travesty

> Easter Island wasn't deforested because people ignored the cost—it was because the cost was accepted in small, manageable steps. Each decision made sense in isolation, and the "payment" was made at the time. But the cumulative result was irreversible.
>
> A policy that allows developers to pay a nominal fee upfront in place of planting trees creates the same dynamic. It converts a tangible, immediate public good into a theoretical future obligation. Once construction is complete, there is little incentive, funding, or feasibility to deliver what was deferred.
>
> The result is predictable: fewer trees, higher long-term costs, and a permanent loss of urban canopy.
>
> One more thing, you can not tell me that whenever you go to a town or city, one of the first things you notice is the amount of Trees, the greenery, the safe harbor
> of nature - why take steps backward in this time of n

Thank You

Scott
In the Field

From:	Bradley Golden
To:	Melgar, Myrna (BOS); ChenStaff; Chen, Chyanne (BOS); MahmoodStaff; Mahmood, Bilal (BOS); Carroll, John (BOS); DorseyStaff (BOS); Fielder, Jackie (BOS); MandelmanStaff (BOS); SauterStaff; SherrillStaff; Walton, Shamann (BOS); WongStaff (BOS); Joshua Klipp
Subject:	"Trees are the lungs of the cities"
Date:	Tuesday, March 24, 2026 8:32:28 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Supervisors,

These are truly difficult times for everyone. Our National and local nervous system has been stressed for quite a while. "Flood the zone" outrage politics has left us tired, distrustful, and frustrated. We all want peace, understanding, and care to thrive in our community. One of the best ways to do that is to prioritize planting more trees in all of San Francisco's neighborhoods!

I'm writing to express my strong opposition to File 251211 - the proposed street tree legislation changes that will harm San Francisco's already puny tree canopy, and reduce oversight and public participation.

As written, the proposed legislation will allow developers to choose between planting trees or paying an inadequate in lieu fee. We know the in lieu is inadequate because a nexus study hasn't been conducted for three years, even though City law requires an annual evaluation of this fee. Meanwhile, the costs of labor, materials and fuel for City trucks have skyrocketed. Additionally, this legislation has no check to ensure developers leave sufficient space for future trees to be planted at their sites. Developers will choose the cheap and easy route, and San Francisco's tree canopy will suffer.

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Even if appeals are limited to 30 days, this effectively renders the appeals process meaningless. Appellants cannot obtain records in time for briefing schedules, and the City can force hearings before a Board of Appeals that does not have all the facts. And while City Officials claim that tree permit appeals slow down projects, they have yet to cite a single example of this in the many news articles and public meetings regarding these proposed amendments.

San Francisco has the smallest tree canopy of any major City in the United States. We have already failed the tree planting goals set out in the 2014 Urban Forest Plan. And now we are thousands of trees behind our tree planting goals in the 2021 Climate Action Plan - a plan created in response to the Declaration that we are in a Climate Emergency. Now is not the time to be playing games with tree planting, oversight and public engagement. **Now is the time to invest in our trees and green infrastructure, and to partner with the community who so desperately wants to make San Francisco healthy, green and resilient for generations to come.**

It's super frustrating how inefficient our government operates. But I want to recognize your hard work and to thank you for showing up every day and making difficult decisions that profoundly impact our lives. Have you seen what Mayor Anne Hidalgo has done for Paris? San Francisco has so much potential to be like Paris. We spend so much on car infrastructure. It's long past time to shift to green infrastructure because it's frightening how hot it has been and it's only going to get worse. If I can speak with you in person, I would love that opportunity. I was born and raised in San Francisco. I'm an artist. Thank you for listening to your constituents, the people of San Francisco.

Trees bring beauty, cool our streets, produce oxygen and clean the air! And don't get me wrong, affordable housing is also very important. But please don't forget to consider how impactful trees are for our health and wellbeing! Please feel free to ask me any questions. I have many years of experience with habitat restoration projects in San Francisco. We are all grateful for your courage to do the hard work for all of us. I hope this long and rambling email makes at least some sense, and if you've read this far, thank you for considering my concerns!

"Trees are the lungs of the cities." — Ben Stanko, District Arborist

Bradley

Benefits of City Trees:

- **Climate & Air:** They cut pollution, cool the air, and produce oxygen.
- **Wellbeing:** They offer peace, reduce stress, and provide a connection to nature.
- **Aesthetics:** They soften, beautify, and bring "white-and-green" to concrete landscapes. Urban Innovators +3

From: GRETCHEN I TURNER
To: Mahmood, Bilal (BOS); Carroll, John (BOS)
Subject: Stop tree removals by developers who pay in-lieu fees!
Date: Monday, March 23, 2026 10:23:24 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Supervisor ,Mahmood and Mr. Carroll,

Now is the time to invest in our trees and green infrastructure, and to partner with the community who so desperately wants to make San Francisco healthy, green and resilient for generations to come.

As a constituent and a native of the City, I'm writing to express my strong opposition to File 251211 - the proposed street tree legislation changes that will harm San Francisco's already puny tree canopy, and reduce oversight and public participation.

As written, the proposed legislation will allow developers to choose between planting trees or paying an inadequate in lieu fee. We know the in lieu is inadequate because a nexus study hasn't been conducted for three years, even though City law requires an annual evaluation of this fee. Meanwhile, the costs of labor, materials and fuel for City trucks have skyrocketed. Additionally, this legislation has no check to ensure developers leave sufficient space for future trees to be planted at their sites. Developers will choose the cheap and easy route, and San Francisco's tree canopy will suffer. What is affordable housing without greenery - Brutalist architecture at its worst!

I have long supported Friends of the Urban Forest in their tree-planting efforts. Now to see more trees removed than replaced is extremely disheartening. Our children and grandchildren will thank and remember us for planting the trees that will shade them in the drastically changed climate to come - long after, like Elvis, we have left the building.

Please defeat this attempt to thwart the appeals process and leave our tree canopy to grow and be extended.

Gretchen Turner
Westwood Park

From:	Bryan Dillingham
To:	ChenStaff; MahmoodStaff; Melgar, Myrna (BOS)
Cc:	Carroll, John (BOS)
Subject:	Protecting San Francisco"s Urban Canopy
Date:	Monday, March 23, 2026 9:16:24 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Supervisors,

I am writing to strongly oppose File No. 251211, which would weaken San Francisco's already limited tree canopy while reducing oversight and public participation.

The legislation allows developers to choose between planting trees or paying an inadequate in-lieu fees. That fee has not been properly updated in over three years despite rising costs and legal requirements for annual review. It also fails to ensure space is preserved for future tree planting, incentivizing developers to avoid planting altogether.

It further eliminates the public's ability to object to or appeal "hazardous" tree removals. Recent errors such as the mistaken designation of an entire block of trees in Hayes Valley demonstrate why oversight is necessary. In fact, 2 of the last 6 hazard tree appeals were upheld, proving these decisions are not infallible.

The proposal also removes appeals for City-initiated tree removals, including major projects involving hundreds of trees, without consulting the Board of Appeals. A 30-day appeal window is functionally inadequate, as records cannot be obtained in time to support meaningful review.
San Francisco already has one of the smallest urban tree canopies in the country and is behind on its climate and planting goals. This legislation moves us in the wrong direction.

Now is the time to invest in our urban forest not weaken protections or silence public input.

Regards,

Bryan Dillingham
882 Kansas St, San Francisco, CA 94107
828-551-3984

From:	Kim Quinones
To:	ChenStaff; Chen, Chyanne (BOS); Melgar, Myrna (BOS); MahmoodStaff; Mahmood, Bilal (BOS); Carroll, John (BOS)
Subject:	Land Use Transportation Committee
Date:	Monday, March 23, 2026 9:14:07 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Supervisors Melgar, Chen and Mahmood,

I'm writing to express my strong opposition to File 251211 - the proposed street tree legislation changes that will harm San Francisco's already puny tree canopy, and reduce oversight and public participation.

As written, the proposed legislation will allow developers to choose between planting trees or paying an inadequate in lieu fee. We know the in lieu is inadequate because a nexus study hasn't been conducted for three years, even though City law requires an annual evaluation of this fee. Meanwhile, the costs of labor, materials and fuel for City trucks have skyrocketed. Additionally, this legislation has no check to ensure developers leave sufficient space for future trees to be planted at their sites. Developers will choose the cheap and easy route, and San Francisco's tree canopy will suffer.

As written, the proposed legislation will completely remove the public from even objecting, let alone appealing, to the removal of trees that the City deems "hazardous". While SFPW promises to only use qualified arborists to make these designations, one such arborist recently - *and erroneously* - designated an entire block of trees in Hayes Valley for immediate removal. It was only a massive public outcry that drew attention to the error. If this law passes, mistakes like these are subject to *zero* public oversight. It's also worth noting that, of the 6 hazard tree appeals in the last 6 years, 2 of them were granted by the Board of Appeals. This further undercuts any assertion that SFPW's "hazard" designation is infallible.

As written, the proposed legislation will prevent the public from appealing *any* City-initiated tree removal. This means that City projects which seek to remove hundreds of trees can no longer be appealed. Projects such as: the Van Ness BRT, the Geary Boulevard BRT, the Folsom / Howard Bike Lane and Streetscape projects - these would no longer be subject to review by the Board of Appeals. Notably, the Board of Appeals - who was not consulted about this proposed change to their jurisdiction - has expressed serious concerns about this amendment.

Even if appeals are limited to 30 days, this effectively renders the appeals process meaningless. Appellants cannot obtain records in time for briefing schedules, and the City can force hearings before a Board of Appeals that does not have all the facts. And while City Officials claim that tree permit appeals slow down projects, they have yet to cite a single example of this in the many news articles and public meetings regarding these proposed amendments.

San Francisco has the smallest tree canopy of any major City in the United States. We have already failed the tree planting goals set out in the 2014 Urban Forest Plan. And

now we are thousands of trees behind our tree planting goals in the 2021 Climate Action Plan - a plan created in response to the Declaration that we are in a Climate Emergency. Now is not the time to be playing games with tree planting, oversight and public engagement. **Now is the time to invest in our trees and green infrastructure, and to partner with the community who so desperately wants to make San Francisco healthy, green and resilient for generations to come.**

Thank you,

Kim Quinones

285 Divisadero St

From: Cindy Navarro
To: Carroll, John (BOS)
Subject: Tree Legislation
Date: Monday, March 23, 2026 9:05:59 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear LUTC Clerk John Carroll,
I'm writing to express my strong opposition to File 251211 - the proposed street tree legislation changes that will harm San Francisco's already puny tree canopy, and reduce oversight and public participation.
As written, the proposed legislation will allow developers to choose between planting trees or paying an inadequate in lieu fee. We know the in lieu is inadequate because a nexus study hasn't been conducted for three years, even though City law requires an annual evaluation of this fee. Meanwhile, the costs of labor, materials and fuel for City trucks have skyrocketed. Additionally, this legislation has no check to ensure developers leave sufficient space for future trees to be planted at their sites. Developers will choose the cheap and easy route, and San Francisco's tree canopy will suffer.
As written, the proposed legislation will completely remove the public from even objecting, let alone appealing, to the removal of trees that the City deems "hazardous". While SFPW promises to only use qualified arborists to make these designations, one such arborist recently - *and erroneously* - designated an entire block of trees in Hayes Valley for immediate removal. It was only a massive public outcry that drew attention to the error. If this law passes, mistakes like these are subject to *zero* public oversight. It's also worth noting that, of the 6 hazard tree appeals in the last 6 years, 2 of them were granted by the Board of Appeals. This further undercuts any assertion that SFPW's "hazard" designation is infallible.
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Even if appeals are limited to 30 days, this effectively renders the appeals process meaningless. Appellants cannot obtain records in time for briefing schedules, and the City can force hearings before a Board of Appeals that does not have all the facts. And while City Officials claim that tree permit appeals slow down projects, they have yet to cite a single example of this in the many news articles and public meetings regarding these proposed amendments.
San Francisco has the smallest tree canopy of any major City in the United States. We have already failed the tree planting goals set out in the 2014 Urban Forest Plan. And now we are thousands of trees behind our tree planting goals in the 2021 Climate Action Plan - a plan created in response to the Declaration that we are in a Climate Emergency. Now is not the time to be

playing games with tree planting, oversight and public engagement. **Now is the time to invest in our trees and green infrastructure, and to partner with the community who so desperately wants to make San Francisco healthy, green and resilient for generations to come.**

Sincerely,
Cindy Navarro
142 Sears Street
San Francisco, CA

From:	Melissa Kite
To:	Carroll, John (BOS)
Cc:	MahmoodStaff; ChenStaff; MelgarStaff (BOS)
Subject:	Changes in Legislation regarding tree removal and exemption from planting trees
Date:	Monday, March 23, 2026 12:22:36 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Supervisors of the Land Use & Transportation Committee,

I have received an email from Joshua Klipp stating your committee will be discussing the matters of tree removal and exemption from planting trees when constructing new buildings.

In doing some research for this, I have found that SF Recreation & Parks is not exempt from posting tree removal. So that should also be true of the Botanical Gardens. The trees I have personally seen being removed and others that just disappear overnight have not been posted.

I have been assuming, along with many of my friends & neighbors, that we have no rights regarding the park and botanical gardens. Over the last several years, many trees have been removed without going through this protocol. This is upsetting.

Therefore, I certainly don't want to encourage any new legislation that would make it the slightest bit easier for them to continue leaving the residents out the process. And both these proposed bills would do so.

In this era of extreme climates, we really need more trees. And we definitely don't need to make it easier for developers not to plant trees. Nor do we need to make it easier for tree removal. And shortening the time for appeal is just another way of thwarting the residents of San Francisco.

And of course we want new residences built, but not at the expense of our well-being. Of all the permits that are required to build, focusing to dismantle the one that helps improve our quality of life and carbon footprint during this era of climate change seems extremely shortsighted.

Thank you for reading this and considering my comments.

Melissa Kite

Resident of District 7

From: Board of Supervisors (BOS)
To: BOS-Supervisors; BOS-Legislative Aides
Cc: Calvillo, Angela (BOS); Somera, Alisa (BOS); Ng, Wilson (BOS); De Asis, Edward (BOS); Entezari, Mehran (BOS); Carroll, John (BOS)
Subject: FW: Board File 251211 (Street Tree Ordinance) Talking points & Media article
Date: Thursday, March 12, 2026 5:30:01 PM
Attachments: image001.png
image003.emz
image004.png

Dear Supervisors,

Please see the below communication regarding File No. 251211.

File No. 251211 - Ordinance amending the Public Works Code to allow development projects to satisfy street tree planting requirements through payment of an in lieu fee or providing alternative landscaping; exempt accessory dwelling units from street tree planting requirements; eliminate appeals to the Board of Appeals for tree removals undertaken by City departments and commissions; and update in lieu fee reporting requirements; amending the Administrative Code to create a separate account within the Adopt-A-Tree Fund to receive in lieu fees for street tree requirements; amending the Planning Code to update street tree applicability requirements; affirming the Planning Department's determination under the California Environmental Quality Act; making findings of consistency with the General Plan, and the eight priority policies of Planning Code, Section 101.1; and making public necessity, convenience, and welfare findings under Planning Code, Section 302.

Thank you,

Eileen McHugh
Executive Assistant
Office of the Clerk of the Board
Board of Supervisors
1 Dr. Carlton B. Goodlett Place, City Hall, Room 244
San Francisco, CA 94102-4689
Phone: (415) 554-7703 | Fax: (415) 554-5163
eileen.e.mchugh@sfgov.org| www.sfbos.org

From: Michael Nulty <sf_district6@yahoo.com>
Sent: Thursday, March 12, 2026 10:23 AM
To: CPC-Commissions Secretary <commissions.secretary@sfgov.org>; boardofsupervisors@sfgov.org
Subject: Board File 251211 (Street Tree Ordinance) Talking points & Media article

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Speaker: Michael Nulty, Citizen Planner, Tenderloin Resident & San Francisco Native

Opening

Good [morning/afternoon], Chair and Members of the Land Use Committee, Planning Commission, and Urban Forestry Council.

My name is Michael Nulty. I'm a citizen planner and lifelong San Francisco native, now a proud resident of the Tenderloin—one of our city's densest, most underserved, and environmentally burdened neighborhoods. Through my work in community planning, I witness daily how development decisions directly impact our streets, health, and quality of life. Today, I speak with deep conviction to strongly oppose Board File 251211 as currently drafted.

Core Message

San Francisco urgently needs *more* trees to become a healthier, cooler, and truly equitable city—not new loopholes that let developers skip planting them, especially in low-canopy priority areas like the Tenderloin, Civic Center, and South of Market, where major projects are advancing right now.

Key Reasons for OppositionCatastrophic Impact on the Tenderloin and Similar High-Burden Neighborhoods

The Tenderloin has one of the city's lowest street tree canopies—often under 3–4% in many blocks, alongside SoMa and Chinatown—far below the citywide average of 13.7%. Our concrete-heavy streets worsen urban heat islands, trap traffic pollution, and leave residents exposed to extreme heat, poor air quality, and wildfire smoke. As an Environmental Justice community, we already face stark disparities: just 0.2 acres of open space per 1,000 people compared to 5 acres citywide. Allowing low in-lieu fees of only $2,590 per tree, vague "alternative landscaping," or ADU exemptions will leave new developments treeless precisely where greening is most critical for public health and equity.

Threatens Federal Equity Investments and the Development Pipeline

The Tenderloin is a top target for the $12 million federal Inflation Reduction Act grant awarded to plant thousands of street trees in low-canopy, heat-vulnerable areas like ours. Right now, numerous affordable housing, mixed-use, and community projects are in the pipeline across the Tenderloin, Civic Center, and nearby districts, seeking financing and approvals. Weakening mandatory on-site planting risks undermining this federal funding, derailing equitable greening tied directly to new builds, and squandering the chance to integrate trees into developments that could transform our streets for the residents who need them most.

Severs Reliable Tree Addition Amid Chronic Underfunding

With massive budget deficits—closing over $800 million in FY 2025-26 and projections exceeding $1 billion—Public Works' Urban Forestry division depends heavily on grants and developer mandates to add new street trees. Expanding in-lieu fees shrinks this vital pipeline at the worst possible time, just as many projects could deliver on-site trees if requirements stay strong.

Destroys Democratic Oversight and Accountability

Eliminating public appeals for City-initiated tree removals isn't streamlining—it's removing essential safeguards that protect mature trees from unnecessary loss. Without clear "hazard" definitions, written and public findings, and preserved appeal rights, this opens the door to unchecked removals. Shifting to online-only notices further excludes vulnerable residents in communities like mine who rely on accessible, in-person engagement.

Broad Coalition Opposition

This proposal faces widespread opposition: over 800 petition signatures, plus business associations, labor unions, tenant groups, neighborhood organizations like Theatre District Neighbors and North of Market Business Association, fellow citizen planners, property owners, and taxpayers. It undermines equity commitments, Justice40 principles, and the goals of our Urban Forest Plan.

What We Demand – Strong Call to Action

I urge you to reject Board File 251211 outright or continue the item until strong protections are restored. At minimum, amend it to:

- Limit in-lieu payments to truly infeasible sites only (impossible, impracticable, or unsafe)—not as a routine developer option.
- Set fees high enough to cover full planting, establishment, irrigation, and long-term maintenance costs—not a bargain substitute.
- Statutorily target spending to low-canopy, high-burden communities like the Tenderloin, using clear, data-driven criteria (canopy <10%, CalEnviroScreen scores, heat vulnerability maps), with enforceable timelines and annual public reporting.
- Preserve appeal rights for all removals and require detailed, publicly posted written findings and evidence for any "hazard" designation.
- Ensure full compliance with California's Mitigation Fee Act, including nexus requirements, fund segregation, and transparent reporting.

Closing

As a citizen planner and Tenderloin resident, I see the wave of upcoming developments not as a burden, but as our best opportunity for meaningful greening. We cannot afford more heat-trapping, barren streets while families and vulnerable neighbors suffer the consequences. Please reject this ordinance or strengthen it substantially to deliver the trees, equity, and oversight our city needs most.

Thank you—I welcome any questions.

Recent news article Attempt to save three trees shows limits of public's power



Attempt to save three trees shows limits of public's power

The city broke its own rules. Now it wants to change them.

Attempt to save three TL trees shows the limits of the public's power

The trees that inspired an appeal are gone. The ability to make that type of appeal could be next.

- Laura Wenus

LAURA WENUS

At U.N. Plaza, several trees like the ones pictured were deemed hazardous and removed. Photo by Noah Arroyo.

March 10 202610:59 AM6 MIN READ Share

Let's say a city department plans to remove a tree on your street. Should you, a member of the public, be able to intervene? Should your objection trigger hearings that force officials to show up, listen, and consider changing course?

City decisionmakers are weighing these questions as they consider a package of tree-related reforms put forward by San Francisco Mayor Daniel Lurie, intended to cut administrative red tape. The proposed legislation would limit the public's ability to appeal tree removals done by the city. It would also let private developers pay a fee instead of planting the trees that would otherwise be required on their real estate projects.

The Planning Commission will consider the in-lieu fee aspect of the legislation this Thursday, and a Board of Supervisors committee is expected to take up the full package later in the month. Many residents have written to the city calling this an anti-transparency move that reduces government accountability and threatens the city's already sparse urban canopy.

But the proposal prunes back a public right that is already difficult to exercise effectively. Under the status quo, there's no guarantee the government won't ignore an appeal in the first place. That's what happened at U.N. Plaza in early 2025, when the city broke its own rules to remove a handful of trees, then sought and abandoned an effort to fine itself for the infraction. The case would have flown under the radar were it not for a local advocacy group called the Tenderloin Tree Campaign. In fact, that incident rankled oversight commissioners so much they actually called for the public's right to appeal to be strengthened.

"A department head, somebody, made the decision: Screw the citizenry, screw the protocol," said Board of Appeals Commissioner Rick Swig at an October hearing on the matter. "At the end of the day, where's the accountability?"

Here's what happened.

The trees slated to be taken out — deemed "hazardous" but not in need of emergency removal — were supposed to stay in the ground for 15 days, long enough to give members of the public a chance to object. The Tenderloin Tree Campaign did so by filing an appeal. But the Recreation and Parks Department removed the trees before the appeal window had elapsed.

This process led to a hearing before the Board of Appeals, where commissioners rebuked the parks department and deliberated over what power they had to make city officials follow these laws.

Dan Mauer, a project manager with the parks department, told the commissioners that officials had been under pressure to take the trees out in time for an event celebrating the completion of the new skate park at U.N. Plaza.

This did not sit well with the commissioners, who grilled Mauer on who had made the decision (the implied answer was then-director Phil Ginsburg) and whether the department's oversight body had been consulted (it had not). Commissioner Swig said the decision to remove the trees so quickly disrespected Tenderloin Tree Campaign leader John Nulty and his brother Michael, and their appeal. Swig encouraged the department to formally apologize to the Nultys (Mauer said he had done so) and recognize them for their decades of advocacy work.

"Trees were something that was secondary to me 10 years ago. These guys have really brought me around, personally, and I thank them for that," Swig said.

But mostly, the commissioners seemed frustrated by the shortcomings of the appeal mechanism itself. If the mandatory waiting period couldn't keep an antsy city department from going ahead with a project, then what would?

One possible answer: the threat of a fine. The city could punish itself (one department could fine another) for violating the appeal procedure. The Department of Public Works, which has jurisdiction over U.N. Plaza, had in fact moved to fine the parks department $30,000.

The parks department objected. At the hearing, representatives laid out their reasoning: They were already spending more than $30,000 on *new* trees. Not only were they replacing those they had illegally removed, they were adding many more, to replace trees that Public Works had taken out. And they were also covering the high cost of irrigating those trees.

In the end, Public Works would agree, and choose not to impose the penalty.

"While a fine is punitive, the remedy of planting 23 new trees — getting them in the ground and, as importantly, doing irrigation for them — is what we wanted to see happen," Public Works spokesperson Rachel Gordon later told me. "So there's a greater benefit than just having the fine."

Here's the thing, though: That decision wasn't reached until ***after*** the Appeals commissioners had their discussion. And, not knowing whether a fine would be imposed, commissioners were very unhappy with the prospect that this was the best compliance tool available. For one thing, the Board of Appeals had virtually no power here. It wasn't up to them to decide on the fine or what the parks department should do to make up for its actions. They could decide only whether the removal permit had been properly issued. Beyond that, all they could do was make recommendations. Second, they were exasperated with the idea that taxpayer money would be used to correct a department's scofflaw behavior.

"It's the city paying the city," said Board President John Trasviña. "So how does that discourage this conduct?"

Mauer, from the parks department, responded with an apparently nervous laugh that the deterrent was "coming and getting yelled at in front of the Board of Appeals."

"I don't have a long-term response on how others will act down the line," he said. "This is something that we don't take lightly and it wasn't a decision that was made flippantly."

The smaller, younger trees on the right were planted to replace mature trees that had been deemed dangerous and removed. Photo by Laura Wenus.

The commissioners felt strongly that the public right to appeal deserved to be strengthened. Weeks after the hearing, they sent a letter to the Board of Supervisors and the mayor, explaining the procedural breach, how little could have been done to prevent it, and that better enforcement mechanisms were needed.

But that letter may have fallen on deaf ears at the Mayor's Office, which at the time was putting forward the proposed legislation I mentioned at the beginning. That proposal would eliminate the appeals process altogether for cases when city departments remove hazardous trees. It would also take other tree removal cases out of the hands of the Board of Appeals, an entity without skin in that game. Instead, the Director of Public Works would decide on the appeal.

It's not clear if what happened at U.N. Plaza inspired the legislation. The Mayor's Office did not return a request for comment. The proposal was originally presented as an effort to streamline the city's permitting and regulatory processes.

Josh Klipp, a self-described "recovering" attorney who helped the Nultys file the U.N. Plaza tree appeal, was deeply dismayed by the proposal. Klipp co-founded a program that came to be known as "Mission Verde," through which the city and Mission District community members collaborate to care for street trees. That effort, Klipp said, began when the city moved to take out trees along the 24th Street corridor, and members of the public appealed. If the mayor's proposed legislation had been in place then, the city would have removed the trees without fanfare and the discussions and negotiations that led to the creation of Mission Verde would never have happened.

The appeals in the Mission were "more than just about trees," Klipp said. "This is about how this community felt. How they were being treated without their input, without their involvement."

Michael Nulty
P.O. Box 420782
San Francisco, CA 94142-0782
(415) 339-8779 - Alliance for a Better District 6

From:	Board of Supervisors (BOS)
To:	BOS-Supervisors; BOS-Legislative Aides
Cc:	Calvillo, Angela (BOS); Mchugh, Eileen (BOS); Ng, Wilson (BOS); Somera, Alisa (BOS); De Asis, Edward (BOS); BOS-Operations; Board of Supervisors (BOS); Carroll, John (BOS)
Subject:	File No. 251211 - Street Trees - 13 Letters
Date:	Thursday, March 12, 2026 3:36:56 PM
Attachments:	251211 13 letters.pdf

Dear Supervisors,

Please see the attached 13 letters from members of the public and various organizations regarding:

> File No. 251211 - Ordinance amending the Public Works Code to allow development projects to satisfy street tree planting requirements through payment of an in lieu fee or providing alternative landscaping; exempt accessory dwelling units from street tree planting requirements; eliminate appeals to the Board of Appeals for tree removals undertaken by City departments and commissions; and update in lieu fee reporting requirements; amending the Administrative Code to create a separate account within the Adopt-A-Tree Fund to receive in lieu fees for street tree requirements; amending the Planning Code to update street tree applicability requirements; affirming the Planning Department's determination under the California Environmental Quality Act; making findings of consistency with the General Plan, and the eight priority policies of Planning Code, Section 101.1; and making public necessity, convenience, and welfare findings under Planning Code, Section 302.

Regards,

Richard Lagunte
Office of the Clerk of the Board – Operations Division
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
Voice (415) 554-7709 | Fax (415) 554-5163
richard.lagunte@sfgov.org | www.sfbos.org

Pronouns: he, him, his

Disclosures: *Personal information that is provided in communications to the Board of Supervisors is subject to disclosure under the California Public Records Act and the San Francisco Sunshine Ordinance. Personal information provided will not be redacted. Members of the public are not required to provide personal identifying information when they communicate with the Board of Supervisors and its committees. All written or oral communications that members of the public submit to the Clerk's Office regarding pending legislation or hearings will be made available to all members of the public for inspection and copying. The Clerk's Office does not redact any information from these submissions. This means that personal information—including names, phone numbers, addresses and similar information that a member of the public elects to submit to the Board and its committees—may appear on the Board of Supervisors' website or in other public documents that members of the public may inspect or copy.*

From: Central City Democrats
To: CPC-Commissions Secretary
Subject: Amend File 251211: Stop the Unregulated In-Lieu Fee Expansion
Date: Saturday, March 7, 2026 6:48:06 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Members of the Land Use Committee, Planning Commission, and Urban Forestry Council,

The Central City Democrats are writing to strongly oppose the proposed street tree legislation in Board File 251211, introduced by Mayor Lurie and Supervisor Wong. This ordinance would amend the Public Works Code, Administrative Code, and Planning Code to permit developers to meet mandatory street tree planting requirements for new projects by paying an in-lieu fee—currently set at $2,590 per tree—instead of planting and maintaining the trees on-site or in the public right-of-way. It would also exempt accessory dwelling units (ADUs) and junior ADUs from these requirements, create a separate account within the Adopt-A-Tree Fund for these fees (with updated reporting but no enforceable geographic or spending mandates), and—most alarmingly—eliminate the public's right to appeal "hazard" tree removals initiated by City departments and commissions to the Board of Appeals, without establishing clear, objective criteria for what qualifies as a hazard.

As Democrats committed to inclusive, transparent, and participatory government, we are deeply troubled by how this legislation undermines core democratic principles: the right of residents to express their views, to be heard through fair and open processes, and to hold government accountable. San Francisco's progressive tradition relies on robust public participation, especially in decisions affecting our shared environment and neighborhoods. The current system allows community members to appeal City-initiated tree removals—providing a vital check against arbitrary or poorly justified actions. By removing this appeal right to the Board of Appeals, the proposal silences residents, reduces transparency, and limits meaningful oversight. This is not streamlining; it is restricting the democratic process that allows everyday San Franciscans to voice concerns about their streets, their air quality, and their community's green spaces.

The legislation also fails to deliver on its claimed equity goals. While proponents argue that in-lieu fees will support tree planting in "low-canopy areas," the ordinance text deposits these funds into the Adopt-A-Tree Fund without statutory requirements to prioritize underserved or high environmental justice burden communities. Without binding geographic restrictions or clear definitions (e.g., tied to canopy cover data or CalEnviroScreen metrics), there is no guarantee the funds will address inequities—potentially turning them into an unaccountable resource rather than a tool for environmental justice.

Furthermore, the Department of Public Works (DPW) has shown it struggles to

manage existing tree-related funds and obligations. In February 2023, DPW collected about $242,000 from UCSF for 105 replacement trees—yet none have been planted years later. In December 2025, DPW canceled over 900 active 311 requests for tree replacements in empty sidewalk basins, without public input or adequate follow-through. Expanding in-lieu fees under these circumstances risks further unfulfilled promises and diminished urban canopy.

Developers already face legitimate hurdles in complying with street tree rules, but the solution lies in reforming and streamlining the permitting process—not in letting them opt out by paying a fee far below the true lifetime cost of a mature street tree (including planting, watering, maintenance, and risk management). This approach prioritizes developer convenience over public benefits like shade, stormwater absorption, air purification, and neighborhood livability.

For these reasons, we urge the City to reject Board File 251211 outright. Democratic governance demands that residents retain the ability to participate meaningfully in decisions that shape our city. Eliminating appeal rights for City-initiated tree removals erodes that participation without advancing housing or efficiency goals—appeals of such removals represent a tiny fraction of the Board of Appeals' caseload and have no direct tie to private development timelines.
If the proposal moves forward, any amendments must at minimum:

- Preserve and strengthen the public's right to appeal tree removals—including hazard designations—to the Board of Appeals, with transparent, evidence-based criteria, public notice, and documentation required for any hazard classification. This ensures residents can be heard in a fair, open process.
- Raise the in-lieu fee substantially to reflect the actual cost of a tree over its lifetime, making on-site planting the default choice.
- Impose strict, enforceable requirements on fee use, mandating prioritization in low-canopy and high environmental justice burden areas using data-driven definitions.
- Require comprehensive public transparency, including annual reports on collections, expenditures, planting locations, and progress on replacement backlogs.

San Francisco's urban forest is a public good that belongs to all residents. Policies must expand and protect it through inclusive, accountable processes—not diminish community voice or green infrastructure. We call on you to uphold democratic values by rejecting or fundamentally amending this proposal.
Sincerely,

Denise Dorey
Co-President
Central City Democrats

Central City Democrats

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Bringing downtown merchants and residents together since 2006.

http://centralcitydemocrats.blogspot.com/

From: TAC
To: CPC-Commissions Secretary
Subject: Amend File 251211: Stop the Unregulated In-Lieu Fee Expansion
Date: Sunday, March 8, 2026 6:35:01 PM

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Dear Members of the Land Use Committee, Planning Commission, and Urban Forestry Council,

The Tenant Associations Coalition of San Francisco and its affiliates are writing to strongly oppose the proposed street tree legislation in Board File 251211. This ordinance, introduced by Mayor Lurie and Supervisor Wong, would allow developers to satisfy mandatory street tree planting requirements for development projects by paying an in-lieu fee—currently set at $2,590 per tree—instead of actually planting trees in the public right-of-way. It would also exempt accessory dwelling units (ADUs) from these requirements, eliminate the public's right to appeal certain tree removals by City departments and commissions, and create a separate account within the Adopt-A-Tree Fund for these fees without strict geographic or spending mandates.

San Francisco residents, particularly tenants in dense urban neighborhoods, already rely heavily on new developments to incorporate sufficient greening measures to make their homes truly habitable. In a city plagued by heat islands, poor air quality, and limited tree canopy—one of the lowest among major U.S. cities—street trees are essential for providing shade, reducing urban heat, improving air quality, mitigating stormwater runoff, and enhancing overall livability. Elected officials have a responsibility to protect residents by ensuring that developers deliver real, on-site green infrastructure that directly benefits surrounding communities and future tenants, rather than allowing opt-outs that prioritize profit over public health and environmental equity.

Permitting developers to pay a modest $2,590 fee in lieu of planting a tree amounts to little more than a giveaway to the real estate industry. Developers will almost certainly choose this low-cost option over navigating the City's often complex planting requirements, site constraints, utility conflicts, and long-term maintenance obligations. This will result in fewer street trees being planted overall, exacerbating the city's already inadequate canopy coverage. The City should instead focus its efforts on meaningfully streamlining the permitting process for legitimate tree planting—such as reducing bureaucratic delays, improving coordination across departments, and providing clearer guidance—rather than creating financial loopholes that enable developers to buy their way out of providing essential green infrastructure.

This legislation is being promoted under a misleading equity narrative. The legislative digest and proponents claim that pooled in-lieu fees will benefit "low-canopy areas" or underserved neighborhoods, often framed as Environmental Justice communities. However, the actual text of the ordinance deposits these fees into the Adopt-A-Tree

Fund (with a new separate account proposed) but includes no geographic spending restrictions, statutory requirements, or enforceable mechanisms to direct funds specifically to designated high-need or low-canopy areas. Without clear definitions and mandates—such as prioritizing "high environmental justice burden" zones or low-canopy census tracts—this creates an unregulated pool of funds that lacks transparency and accountability.

Compounding these concerns is the Department of Public Works' poor track record in managing existing in-lieu fees and tree-related obligations. For example, in February 2023, Public Works collected $242,000 from UCSF as an in-lieu payment to plant 105 replacement trees as mitigation for removals tied to a project. As of later reports, zero of those trees had been planted, despite the funds being received years earlier. This demonstrates a clear inability or unwillingness to deploy collected fees effectively for their intended purpose.

Furthermore, in December 2025, the Department administratively canceled over 900 active 311 service requests for tree replacements in empty sidewalk basins across the city. These cancellations abandoned opportunities to fill vacant tree wells and expand the canopy in neighborhoods that desperately need it, further eroding public trust in the Department's capacity to steward tree funds and programs responsibly.

The proposal also eliminates the public's right to appeal "hazard" tree removals by City departments without providing a clear, statutory definition of what constitutes a true hazard (currently defined narrowly as a tree posing an "imminent hazard to person or property"). This change risks allowing the City to broadly label any inconvenient or redevelopment-obstructing tree as "hazardous," fast-tracking removals without meaningful public oversight, notice, or recourse.

For these reasons, the Tenant Associations Coalition of San Francisco urges the Land Use Committee, Planning Commission, and Urban Forestry Council to reject Board File 251211 in its entirety. If the proposal advances, any amendments must at minimum:

- Substantially increase the in-lieu fee to reflect the true, long-term cost of planting, establishing, and maintaining a mature street tree (far exceeding $2,590);
- Include strict, statutory requirements dictating that funds be spent exclusively in designated low-canopy and high environmental justice burden areas, with clear definitions and annual transparent reporting;
- Preserve and strengthen the public's right to appeal tree removals, including hazard designations, with robust notice, hearing, and oversight processes; and
- Mandate full transparency and accountability measures for all hazard designations and fee expenditures.

San Francisco cannot afford to weaken protections for its urban forest at a time when climate resilience, equity, and tenant livability demand stronger commitments to green infrastructure.

Sincerely,

Susan Bryan
Co-Founder
Tenant Associations Coalition of San Francisco and Affiliates

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Serving San Francisco since September, 1997

From:	Board of Supervisors (BOS)
To:	BOS-Supervisors; BOS-Legislative Aides
Cc:	Calvillo, Angela (BOS); Somera, Alisa (BOS); Ng, Wilson (BOS); De Asis, Edward (BOS); Entezari, Mehran (BOS); Carroll, John (BOS)
Subject:	FW: Amend File 251211: Stop the Unregulated In-Lieu Fee Expansion
Date:	Monday, March 9, 2026 9:59:00 AM

Dear Supervisors,

Please see the below communication regarding File No. 251211.

File No. 251211 - Ordinance amending the Public Works Code to allow development projects to satisfy street tree planting requirements through payment of an in lieu fee or providing alternative landscaping; exempt accessory dwelling units from street tree planting requirements; eliminate appeals to the Board of Appeals for tree removals undertaken by City departments and commissions; and update in lieu fee reporting requirements; amending the Administrative Code to create a separate account within the Adopt-A-Tree Fund to receive in lieu fees for street tree requirements; amending the Planning Code to update street tree applicability requirements; affirming the Planning Department's determination under the California Environmental Quality Act; making findings of consistency with the General Plan, and the eight priority policies of Planning Code, Section 101.1; and making public necessity, convenience, and welfare findings under Planning Code, Section 302.

Thank you,

Eileen McHugh
Executive Assistant
Office of the Clerk of the Board
Board of Supervisors
1 Dr. Carlton B. Goodlett Place, City Hall, Room 244
San Francisco, CA 94102-4689
Phone: (415) 554-7703 | Fax: (415) 554-5163
eileen.e.mchugh@sfgov.org| www.sfbos.org

From: Michael Nulty <sf_district6@yahoo.com>
Sent: Saturday, March 7, 2026 4:16 PM
To: CPC-Commissions Secretary <commissions.secretary@sfgov.org>
Subject: Amend File 251211: Stop the Unregulated In-Lieu Fee Expansion

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Dear Members of the Land Use Committee, Planning Commission, and Urban Forestry Council:

The Alliance for a Better District 6 is writing to strongly oppose the proposed street tree legislation in Board File 251211, introduced by the Mayor and Supervisor Wong. This ordinance would amend the Public Works Code, Administrative Code, and Planning Code to allow developers to satisfy mandatory street tree planting requirements for new development projects by paying an in-lieu fee—currently set at $2,590 per tree—rather than actually planting and maintaining the required trees on-site or in the public right-of-way. It would also exempt accessory dwelling units (ADUs) and junior ADUs from these planting requirements entirely, eliminate the public's right to appeal tree removals classified as "hazardous" by City departments and commissions to the Board of Appeals, and create a separate account within the existing Adopt-A-Tree Fund to receive these in-lieu fees (with updated reporting requirements but no binding geographic or programmatic restrictions on spending).

This proposal represents a substantial giveaway to the real estate development industry at the expense of San Francisco's urban forest, environmental health, and equitable access to green infrastructure. Developers, facing the complexities of navigating the City's existing street tree planting requirements—including site assessments, species selection, infrastructure conflicts, and long-term maintenance obligations—will overwhelmingly opt to pay the relatively modest in-lieu fee instead of fulfilling their responsibility to plant trees. Rather than addressing legitimate barriers through meaningful reforms, such as streamlining the permitting process, improving coordination between departments, or providing clearer guidance and technical assistance to developers, this legislation simply allows them to pay to avoid compliance altogether. The result will be fewer on-site street trees in new developments, reduced canopy in growing neighborhoods, and diminished public benefits such as shade, air quality improvement, stormwater management, and biodiversity.

The legislation is being promoted under a misleading equity narrative. The legislative digest and public justifications suggest that pooled in-lieu fees will be directed toward "low-canopy areas" or communities with high environmental justice burdens. However, the actual text of the ordinance deposits these funds into the Adopt-A-Tree Fund (with a new separate account for street tree in-lieu fees) without any statutory mandates, geographic restrictions, or enforceable requirements to prioritize spending in underserved or low-canopy neighborhoods. Without clear definitions—such

as those tied to established Environmental Justice screening tools or low-canopy thresholds—and binding allocation priorities, this creates the risk of an unregulated pool of funds that could be spent anywhere in the City, undermining claims of equity-focused outcomes.

Compounding these concerns is the Department of Public Works' (DPW) demonstrated inability to effectively manage and deploy existing in-lieu fees and tree replacement funds. For example, in February 2023, DPW's Bureau of Urban Forestry collected approximately $242,000 from UCSF as an in-lieu payment for 105 replacement trees related to a project mitigation requirement. As of recent records, **none** of those replacement trees have been planted, leaving the funds unspent and the mitigation unfulfilled years later. This pattern of underperformance raises serious doubts about DPW's capacity to responsibly administer an expanded in-lieu fee program.

Even more troubling, in December 2025, DPW administratively canceled over 900 active 311 service requests specifically for tree replacements in empty sidewalk tree basins across the City. These cancellations occurred without public notice, community input, or meaningful replacement efforts, further eroding trust in the department's commitment to maintaining and expanding the urban canopy.Additionally, the proposal eliminates the public's current right to appeal "hazard" tree removals to the Board of Appeals when such removals are initiated by City departments or commissions. It does so without providing a clear, objective definition or transparent criteria for what qualifies as a "hazard" tree (beyond the existing vague reference to "imminent hazard to person or property"). This change risks enabling arbitrary or expedited removals of healthy or inconvenient trees under the "hazard" label, bypassing public oversight and accountability.

For these reasons, we urge the City to reject Board File 251211 in its current form. If the proposal is not withdrawn entirely, any acceptable amendments must include the following critical changes:

- Substantially increase the in-lieu fee to reflect the full, true cost of planting, establishing, and maintaining a mature street tree over its lifetime (including labor, materials, watering, pruning, risk management, and replacement if needed), ensuring the fee is high enough to make on-site planting the clear preference for developers.
- Establish strict, enforceable requirements on the geographic and programmatic use of in-lieu fees, such as mandating that a significant portion (or all) be spent in designated low-canopy areas and/or high environmental justice burden communities, using clear, data-driven

definitions (e.g., based on tree canopy cover maps, CalEnviroScreen scores, or similar metrics).

- Preserve and strengthen the public's right to appeal tree removals—including hazard designations—to the Board of Appeals, while requiring transparent, evidence-based criteria, documentation, and public notice for any hazard classification.
- Mandate full transparency in reporting, including annual public disclosures of in-lieu fee collections, expenditures, locations of plantings funded by the fees, and progress on backlog replacement projects.

San Francisco's urban forest is a vital public asset that requires protection and expansion, not policies that facilitate its diminishment. We ask that you prioritize genuine solutions that increase tree canopy equitably and hold City departments accountable for existing obligations.

Sincerely,

Michael NultyExecutive Director
Alliance for a Better District 6

Michael Nulty

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San Francisco, CA 94142-0782
(415) 339-8327 - Direct
(415) 339-8779 - Alliance for a Better District 6
(415) 339-8683 - Central City Democrats
(415) 937-1289 - North of Market Business Association

http://abd6.cfsites.org/

From: tenderloin treecampaign
To: Board of Supervisors (BOS)
Cc: Carroll, John (BOS); Ronin, Jonas (CPC)
Subject: Urgent Opposition to Board File 251211 - Don't Let Developers Destroy San Francisco's Urban Forest!
Date: Monday, March 9, 2026 8:30:58 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Planning Commission Members, Land Use and Transportation Committee, and Urban Forestry Council,

As a dedicated resident of Civic Center, I am outraged by Board File 251211 and demand that you reject this dangerous proposal immediately. This isn't just a minor tweak—it's a blatant assault on our city's vital urban forest, handed on a silver platter to greedy developers at the expense of our communities and environment.

Imagine our streets stripped bare: developers dodging their responsibility to plant street trees by simply paying a paltry $2,590 fee per tree. This "pay-to-skip" scheme is nothing short of a massive giveaway to the real estate industry, ensuring they'll always take the easy way out—leaving new developments with lifeless, concrete sidewalks that worsen heat islands and diminish our quality of life. We can't afford to let this happen when San Francisco desperately needs more greenery to combat climate change, clean our air, and foster vibrant neighborhoods

.

The City's hollow promises that these fees will magically plant trees in "low-canopy areas" are exposed as fiction—the bill's text includes no enforceable requirements whatsoever. Funds vanish into a vague sub-account of the Adopt-A-Tree Fund, left to the whims of Public Works, whose track record is abysmal. Just look at the $242,000 from UCSF in 2023, meant for 105 replacement trees: three years later, not a single one has been planted! This is not oversight; it's incompetence that we refuse to tolerate any longer.

Worse still, the ordinance rips away our fundamental rights by eliminating appeals to the Board of Appeals for city-initiated tree removals, including those labeled "hazardous" under conveniently loose definitions. Without strict safeguards, Public Works could arbitrarily declare any tree an "inconvenience" to developers and axe it without a shred of public oversight. This isn't progress—it's a recipe for unchecked destruction that erodes democracy and accountability.

Our trees are irreplaceable lifelines: they shade our homes, purify our air, boost mental health, and build resilient communities. In neighborhoods, these trees have transformed scorching summers into bearable ones and created safe havens for families. Sacrificing them for developer profits would be a betrayal of everything that makes San Francisco special.

I implore you—do not betray our city. Reject Board File 251211 outright or overhaul it to mandate on-site planting, lock fees into ironclad commitments for low-canopy areas with strict deadlines, and restore full appeal rights. Stand with residents, not special interests, for a truly greener, fairer, and more beautiful San Francisco. The future of our urban forest—and our city—depends on your action now.

Thank you for heeding this urgent call.

Sincerely,

Mr. John Nulty co-chair
Tenderloin Tree Campaign
P. O. Box 421949
San Francisco, CA 94142-1949
https://url.avanan.click/v2/r01/__http://tenderlointreecampaign.blogspot.com/__.YXAzOnNmZHQyOmE6bzozMjhjZjQ4NDhmMTI1MTZhYWM2MjdlNDExODVlZmFjNDo3Ojg3ODg6MTg1MGQ4YTFlYjliNjkzOWUyMTc4NTJmYzA4ODVlNDJmYzlwZDAyNGNlMjc0OGFiY2Q2NzRhOWZjOWQ3ZDY1MDp0OlQ6Tg

From: northofmarketplanningcoalition@yahoo.com
To: CPC-Commissions Secretary
Subject: Opposition to Proposed Legislation (File No. 251211) – Elimination of Appeals for Street Tree Removals by City Departments and Commissions
Date: Tuesday, March 10, 2026 3:22:10 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Members of the Land Use Committee, Planning Commission, and Urban Forestry Council,

The former board members of the North of Market Planning Coalition are writing to express our firm opposition to the proposed ordinance in Board File 251211. This legislation, introduced by Mayor Daniel Lurie and Supervisor Alan Wong, would amend the Public Works Code to allow development projects to satisfy mandatory street tree planting requirements through payment of an in-lieu fee (currently set at $2,590 per tree) or by providing alternative landscaping; exempt accessory dwelling units (ADUs) from these requirements; eliminate the public's right to appeal tree removals initiated by City departments and commissions; and update in-lieu fee reporting requirements. It would further amend the Administrative Code to create a separate account within the Adopt-A-Tree Fund specifically for these in-lieu fees, and amend the Planning Code to align street tree applicability with these changes.

San Francisco already has one of the lowest urban tree canopy coverages among major U.S. cities—approximately 13-14%—far below the national average and well short of what is needed for climate resilience, heat mitigation, air quality improvement, stormwater management, and overall quality of life. This sparse canopy is unevenly distributed, with low-canopy areas disproportionately affecting Environmental Justice communities in neighborhoods like South of Market, the Tenderloin, Bayview, and the Mission, where canopy coverage can dip as low as 4-7%. These areas face heightened risks from urban heat islands, poor air quality, and related health disparities.

As former leaders of a coalition long dedicated to thoughtful planning and community well-being in the North of Market area and beyond, we strongly oppose any weakening of existing street tree protections. Allowing developers and property owners to opt out of on-site planting via a relatively low in-lieu fee or vague "alternative landscaping" will predictably result in fewer trees being planted in the public right-of-way near new developments—precisely where they provide the most direct benefits to residents, pedestrians, and the immediate neighborhood. Developers will opt for the fee to avoid site-specific challenges, long-term maintenance responsibilities, and permitting hurdles, turning what should be a mandatory contribution to the urban forest into an optional, underfunded substitute.

Exempting ADUs from requirements further erodes potential canopy gains in residential areas, while eliminating public appeals for City-initiated tree removals

removes critical oversight and accountability. Without clear definitions of "hazard" trees and preserved appeal rights, this risks enabling unchecked removals that prioritize expediency over preservation.

Rather than diluting protections, the City should pursue policies that actively increase the urban tree canopy citywide to address equity gaps and build climate resilience. We urge rejection of Board File 251211 in its entirety and instead support the following stronger measures:

- **Mandate and incentivize on-site planting** wherever feasible, with significantly higher in-lieu fees (well above $2,590, reflecting true costs of planting, establishment, irrigation, and 10+ years of maintenance for a mature tree) to discourage opt-outs and generate substantial revenue for proactive planting.
- **Prioritize fee expenditures** strictly in low-canopy, high Environmental Justice burden neighborhoods through statutory requirements, clear definitions (e.g., based on census tract data for canopy coverage below 10% and heat/pollution vulnerability), and annual transparent reporting on fund allocation and tree planting outcomes.
- **Streamline legitimate tree planting processes** by improving inter-departmental coordination, reducing bureaucratic delays for permits, providing technical assistance and pre-approved species/site guidance, and expanding partnerships with nonprofits like Friends of the Urban Forest to accelerate community-driven plantings.
- **Expand proactive citywide initiatives**, such as ambitious targets to fill vacant sidewalk tree basins (thousands exist citywide), launch targeted planting programs in underserved areas funded by general fund allocations or grants, and integrate tree canopy goals into all major planning documents and development approvals.
- **Strengthen public oversight**, including preserving and enhancing appeal rights for all tree removals, requiring robust notice and justification for hazard designations, and reinvigorating advisory roles for bodies like the Urban Forestry Council to guide equitable canopy expansion.

San Francisco's residents deserve a greener, healthier, more equitable city. Weakening tree requirements under the guise of permitting reform will only set back progress toward a more livable urban environment. We call on you to reject this proposal and champion measures that truly grow our tree canopy for all San Franciscans.
Sincerely,

Former Board Members,
North of Market Planning Coalition

From:	Robert Hall
To:	CPC-Commissions Secretary; Board of Supervisors (BOS); Carroll, John (BOS)
Subject:	Public Comment: Planning Code Amendment – Ordinance, sponsored by Mayor Lurie to remove street trees
Date:	Tuesday, March 10, 2026 12:13:56 PM

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Dear Planning Commissioners, Supervisors and Land Use and Transportation Committee Members,

Please reject Mayor Lurie's proposal to allow developers to forego their street tree responsibilities while paying a scant penalty. The public is growing weary of "Billionaires and Developers First" laws that cheapen our neighborhoods, diminish quality of life and air we breath and take away San Franciscans rights to weigh-in on matters. We don't want to be walled in by towers and concrete barriers. This may seem like a small issue but is a glaring blinking light indicating how far the city leaders are going to remake the city for the wealthy few who stand to profit by dismantling neighborhoods.

Now is not the time to pass laws to reduce our street tree canopy. The mayor is already defunding the Environment Department, much like his billionaire co-hort, Donald Trump, is doing on the federal level. We know the mayor is crime obsessed. Here's something that may appeal to him: *Studies have found that neighborhoods with greater tree canopy often experience **lower crime rates.** One analysis linked a 10% increase in canopy to a roughly 12% reduction in crime. Researchers believe greenery signals that a place is cared for and encourages more people to spend time outdoors, increasing informal neighborhood oversight.*

Bob Hall
94117

From: Jean Barish
To: CPC-Commissions Secretary
Cc: Board of Supervisors (BOS); Carroll, John (BOS)
Subject: SF Planning Commission Meeting, March 12, 2026 – Agenda Item 9 – Board File #251211
Date: Tuesday, March 10, 2026 2:40:04 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Commissioners:

I am a Richmond District resident and President, Planning Association for the Richmond. I am writing on my own behalf regarding Agenda Item 9 on the March 12, 2026, Planning Commission Meeting. This Ordinance will impact San Francisco's tree canopy by allowing developers to pay an *in lieu* fee instead of planting trees in front of new developments. It will also alter the appeals process for tree removal. For the reasons set forth below, I oppose the proposed Ordinance as currently drafted.

Developers Should Not be Gifted with the Opportunity to Opt Out of Planting Trees

There are several reasons why I oppose this section of the Ordinance:

- The *in lieu* fee of $2590 is unrealistically low and gives a developer an incentive to pay it instead of planting trees and maintaining them for a few years. It is likely, therefore, that this option will result in fewer trees being planted in San Francisco.

- Payment of an *in lieu* fee does not assure a new tree will be planted somewhere else in the city, especially since there is no mechanism to ensure that a healthy new tree will be planted elsewhere. The City claims these fees will fund tree planting in "low-canopy areas." The actual text of the legislation contains no such requirement. The money goes into a general fund. We know Public Works fails to manage these funds. In 2023, they collected $242,000 from UCSF to plant 105 replacement trees. Three years later, those trees remain unplanted. This *in lieu* fee loophole is a gift to developers that will likely result in fewer trees in the City.

- Developers often see trees as an inconvenience. This provision will likely incentivize developers to pay the fee in order to avoid planting much needed trees, especially in a City that already has an unusually small tree canopy.

There Should be More Conditions Attached to the Removal of a Hazardous Tree Without Appeal

While it is important that hazardous trees should be removed, the designation of "hazard" needs more oversight and transparency. This section of the ordinance should not be approved unless and until it includes a commitment that the designation process has proper oversight, is transparent, and includes a commitment to expedited replanting when a tree is removed due to being "hazardous".

Compressing Appeal Times for All Other City-Initiated Tree Removals is Unacceptable

Compressing the time for appeals is problematic and should not be approved. There is no evidence that appeals will increase construction costs, which is what the Mayor's office claims. While most City projects are years in the making, the average appeal time is only 75 days.

Further, a compressed time period would make it more difficult for an appellant to mount a meaningful appeal, since seeking public records takes longer than the 30 days allowed in this proposed appeal schedule. Shortening the appeal time, therefore, will unfairly deny appellants their due process rights, and should be rejected.

In conclusion, now is not the time to pass an ordinance that reduces our tree canopy, the oversight of tree removal and planting, and the public's right to stand up for the few trees we have. San Francisco needs sound ordinances and policies that will enhance our tree canopy, not diminish it. For the sake of our City and for the sake of our environment, please do not pass this Ordinance as currently written.

Thank you for your consideration.

Sincerely,



Jean B Barish

Jean B Barish, Esq., MS, MA
jeanbbarish@hotmail.com

From:	judith zimrin
To:	CPC-Commissions Secretary; Carroll, John (BOS); Crayton, Monique (BOS); Jalipa, Brent (BOS); Board of Supervisors (BOS)
Subject:	trees and public input
Date:	Tuesday, March 10, 2026 4:10:33 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

As the Land Use Transportation Committee considers the Mayor's full proposed amendments to our street tree legislation: (1) give developers the choice to plant or not; (2) eliminate the public's right to appeal trees that are designated as "hazards"; (3) and allow the public to appeal City-initiated tree removals but only on a compressed time schedule that could, in essence, curtail the public's ability to mount an effective defense of our trees, I would like to speak out against these proposals.

As a resident of North Beach we have been through these battles before. It is important to keep our city as green as possible and always allow time and space for neighbors input. **In short, now is not the time to be passing laws that reduce our tree canopy, its oversight, and the public's right to stand up for the few trees we have.** San Francisco has the smallest urban forest of any major city in the United States. And, since 2017,*we have net lost hundreds of street trees*. Further, we are thousands of trees behind what is called for in our City's own Climate Action Plan - a plan created in response to the 2019 Declaration that we are in a Climate Emergency. **It is astounding that, as our climate rapidly deteriorates, we are playing games with this critical aspect of our City's climate resilience rather than doubling down on protecting and planting more trees.**

Thank you,

Judith Zimrin

From: NorthofMarket BusinessAssociation
To: CPC-Commissions Secretary; Board of Supervisors (BOS)
Subject: Amend File 251211: Stop the Unregulated In-Lieu Fee Expansion
Date: Thursday, March 12, 2026 5:31:50 AM

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Dear Members of the Land Use Committee, Planning Commission, and Urban Forestry Council,

The North of Market Business Association is writing to express our firm opposition to the proposed ordinance in Board File 251211. This legislation, introduced by Mayor Daniel Lurie and Supervisor Alan Wong, would amend the Public Works Code to allow development projects to satisfy mandatory street tree planting requirements through payment of an in-lieu fee (currently set at $2,590 per tree) or by providing alternative landscaping; exempt accessory dwelling units (ADUs) from these requirements; eliminate the public's right to appeal tree removals initiated by City departments and commissions; and update in-lieu fee reporting requirements. It would further amend the Administrative Code to create a separate account within the Adopt-A-Tree Fund specifically for these in-lieu fees, and amend the Planning Code to align street tree applicability with these changes.

San Francisco's urban tree canopy remains critically low—approximately 13-14% citywide, with some neighborhoods like South of Market, the Tenderloin, and other Environmental Justice areas experiencing coverage as low as 4-7%. This deficiency exacerbates urban heat islands, poor air quality, and health disparities in dense commercial and mixed-use districts, including North of Market and adjacent areas where businesses and residents alike suffer from limited shade and greening.

As an association representing businesses in the North of Market area, we know firsthand the vital role that street trees play in creating vibrant, safe, and economically thriving commercial corridors. Beautification through mature street trees in front of all commercial spaces—especially those associated with new development projects—is essential. Trees provide essential shade that makes sidewalks more comfortable for pedestrians during San Francisco's warmer days, fostering a neighborly, friendly atmosphere that encourages lingering, social interaction, and foot traffic. Research consistently shows that tree-lined streets attract more customers: businesses on streets with healthy canopy coverage report higher income streams (often 12% or more), as shoppers prefer shaded, inviting environments that promote relaxation and reduce stress. The calming effects of trees—known to lower aggression, improve mental health, and enhance overall perceptions of safety—help deter crime by increasing "eyes on the street" through greater pedestrian presence and informal surveillance. Studies across U.S. cities, including Baltimore and Portland, demonstrate that higher tree canopy correlates with reduced rates of violent and property crimes, as well as lower stress and increased community cohesion. These benefits add tangible value to future businesses by boosting property appeal,

increasing customer draw, and supporting long-term economic vitality in commercial districts.

Allowing developers to default to a modest in-lieu fee or vague alternative landscaping will inevitably lead to fewer on-site street trees planted directly in front of new commercial and mixed-use developments—precisely where they deliver the most immediate benefits to businesses, employees, customers, and the surrounding community. Developers will opt for the low-cost fee to sidestep site constraints, maintenance responsibilities, and permitting complexities, resulting in lost opportunities for greening that could enhance safety, customer attraction, and neighborhood appeal. Exempting ADUs further limits potential canopy gains in residential-adjacent areas, while removing public appeal rights for City-initiated tree removals reduces accountability and risks unchecked eliminations that undermine existing beautification efforts.

Rather than weakening these requirements, the City must prioritize policies that aggressively expand the urban tree canopy, particularly in commercial and underserved areas, to support business success, public safety, and climate resilience. We urge the rejection of Board File 251211 in its entirety. If the proposal advances, it must be substantially amended so that:

1. In-lieu payments are limited to truly infeasible sites (where planting is impossible, impracticable, or unsafe), rather than serving as a default option for any project.
2. The fee reflects the full cost of planting, establishment, irrigation, and long-term maintenance (far exceeding the current $2,590 bargain-rate substitute) to discourage routine opt-outs and ensure adequate revenue for meaningful tree planting.
3. Spending is statutorily targeted to defined low-canopy and high Environmental Justice burden communities, with published criteria, maps (based on census tract data for canopy below 10% and vulnerability indices), and enforceable timelines for deployment and annual transparent reporting.
4. The ordinance preserves appeal rights for all tree removals and requires written, publicly posted findings and evidence for any “hazard” designation to maintain public oversight and prevent abuse.
5. The City fully complies with California’s Mitigation Fee Act requirements (Government Code § 66000 et seq.), including establishing a clear nexus between the fee and development impacts, segregating and accounting for revenues, providing regular public reporting, and ensuring lawful use of funds for their intended purpose.

San Francisco's businesses and residents deserve stronger protections for our urban forest, not loopholes that prioritize short-term development ease over long-term livability, safety, and economic health. Rejecting or meaningfully amending this proposal is essential to growing a greener, more welcoming, and prosperous city for

all.

Sincerely,

Karim Rantisi
Co-Founding member
North of Market Business Association

From: Theatre District Neighbors
To: Board of Supervisors (BOS)
Cc: CPC-Commissions Secretary
Subject: Please Amend File 251211: Stop the Unregulated In-Lieu Fee Expansion
Date: Thursday, March 12, 2026 5:48:12 AM

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Dear Members of the Land Use Committee, Planning Commission, Urban Forestry Council, and elected officials:

Theatre District Neighbors is writing to strongly oppose the provision in Board File 251211 that eliminates the public's right to appeal City-initiated tree removals. Removing due process is not "streamlining"; it is a dangerous erosion of critical oversight that has historically protected mature trees from unnecessary destruction. This change risks allowing City departments and commissions to label and remove trees as "hazardous" without clear justification, public input, or recourse—undermining decades of community advocacy for preserving our urban forest in dense, low-canopy areas like the Tenderloin, Civic Center, and surrounding Theatre District neighborhoods.

San Francisco desperately needs more trees to make our city an even better place to live, work, and visit. Our urban canopy remains among the lowest in major U.S. cities at approximately 13-14% overall, with neighborhoods in the Theatre District and adjacent areas often faring worse due to dense development, concrete-heavy streetscapes, and historical underinvestment in greening. Expanding tree coverage here would provide essential shade to combat urban heat, improve air quality amid traffic and pollution, reduce stormwater runoff, enhance mental health and community well-being through calming green spaces, and create more inviting public realms for residents, theatergoers, workers, and visitors.

Furthermore, we request that the legislation be amended to strictly define "low tree canopy" neighborhoods using a transparent, data-driven methodology. This should incorporate current canopy cover percentages (e.g., from Planning Department or DataSF analyses showing coverage below 10% in many underserved tracts), environmental burden scores (such as those from CalEnviroScreen or local Environmental Justice mapping tools), heat vulnerability indices, pollution exposure, and socioeconomic factors. Without such clear, statutory definitions—accompanied by published criteria, maps, and enforceable spending requirements—the in-lieu fee mechanism risks becoming an unregulated slush fund. Collected fees could fail to reach the neighborhoods with the highest environmental burdens and greatest need for equitable greening, instead being dispersed without accountability or measurable impact.

We urge you to **continue** this item until these essential democratic and equitable protections are restored and strengthened. Specifically, please reject Board File

251211 or amend it so that:

1. **In-lieu payments are limited to truly infeasible sites (where planting is impossible, impracticable, or unsafe), rather than serving as a default option for any project.**
2. **The fee reflects the full cost of planting, establishment, irrigation, and long-term maintenance—not a bargain-rate substitute.**
3. **Spending is statutorily targeted to defined low-canopy and high Environmental Justice burden communities, with published criteria, maps (based on census tract data for canopy below 10% and vulnerability indices), and enforceable timelines for deployment and annual transparent reporting.**
4. **The ordinance preserves appeal rights for all tree removals and requires written, publicly posted findings and evidence for any "hazard" designation to maintain public oversight and prevent abuse.**
5. **The City fully complies with California's Mitigation Fee Act requirements (Government Code § 66000 et seq.), including establishing a clear nexus between the fee and development impacts, segregating and accounting for revenues, providing regular public reporting, and ensuring lawful use of funds for their intended purpose.**

San Francisco's future depends on bold, equitable investments in our urban forest—not loopholes that weaken protections and delay meaningful canopy growth. Theatre District Neighbors stands ready to support policies that truly prioritize more trees, stronger oversight, and environmental justice for all residents.

Sincerely,

Theatre District Neighbors

--

Theatre District Neighbors

P.O. Box 420846

San Francisco, CA 94142-0846

theatredistrictneighbors@gmail.com

(415) 339-8779

https://atasf7.wixsite.com/tdneighbors

From: dweller SF
To: CPC-Commissions Secretary
Cc: Board of Supervisors (BOS); Carroll, John (BOS)
Date: Thursday, March 12, 2026 6:09:31 AM

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Dear Members of the Land Use Committee, Planning Commission, and Urban Forestry Council,

As a resident of ZIP code 94105 in the Rincon Hill, South Beach, and South of Market (SoMa) area—one of San Francisco's fastest-growing neighborhoods dominated by high-rises and with critically low tree canopy coverage of approximately 4-5% (far below the citywide average of 13.7%), including areas like South Beach and parts of SoMa with very little tree cover—I and my family are vehemently opposed to the proposed amendments in Board File 251211. Our concrete-heavy streets already create severe urban heat islands, poor air quality, and extreme vulnerability to wildfire smoke and heat waves. These changes would exacerbate environmental inequities by letting developers skip on-site tree planting in the very places experiencing intense new development.

We need more trees to make SF an even better city. San Francisco's urban canopy remains one of the lowest among major U.S. cities, and neighborhoods like ours suffer disproportionately, with street tree canopy in South of Market and Civic Center at just 4.1%. This scarcity intensifies heat (temperatures 10–20°F higher than greener areas), worsens air pollution from nearby freeways and traffic, and heightens risks during California's wildfires and droughts—we endured weeks of hazardous orange skies and smoke in 2020. Residents here face elevated threats of heat-related illness, respiratory problems, and other climate impacts. More trees would provide essential shade, cleaner air, stormwater mitigation, and a healthier, more livable environment for families, workers, and visitors in our high-density district.

This opposition is widespread: An online petition has garnered over 800 signatures, and a broad coalition—including business associations, labor unions, tenant groups, neighborhood associations, citizens planners, property owners, taxpayers, and many others—is firmly opposing the legislation as written. And found in public comments section letter from many community groups highlighting how these changes weaken protections and fail to deliver equitable greening.

Key Reasons for Opposition:
Devastating Blow to Greening in High-Density, Low-Canopy Areas Like 94105
Rincon Hill, South Beach, and SoMa have some of the lowest street tree canopy in the city—around 4.1% in parts of SoMa—with vast stretches of pavement and towering buildings offering little shade. These areas are priority zones for the $12 million federal Inflation Reduction Act grant awarded to San Francisco Public Works in 2023, targeting low-canopy, heat-vulnerable neighborhoods including SoMa to

plant 3,500 new street trees and create green jobs. Allowing developers to pay in-lieu fees instead of planting on-site—or exempting accessory dwelling units (ADUs)—would undermine this critical effort, leaving new luxury high-rises without greenery and denying residents immediate cooling and cleaner air amid booming development.

Undermining Our Primary Source of New Trees Amid Severe Budget Crises
With the City's historic budget deficits—closing an $800+ million shortfall in FY 2025-26 and facing projections up to $1 billion or more in coming years—Public Works' Urban Forestry programs are chronically underfunded, relying heavily on grants and external sources. Mandatory tree planting from new development has become the main reliable way San Francisco adds street trees. Expanding in-lieu fees and exemptions would sever this vital pipeline, stalling greening in fast-developing areas like mine where every tree is essential.

Exacerbating Life-Threatening Health and Climate Risks
Low tree canopy in 94105 leads to temperatures 10–20°F higher than greener neighborhoods, worsened air quality from traffic and freeways, and severe impacts from wildfires and droughts. Eliminating the public's right to appeal City-initiated tree removals erodes critical oversight—removing due process is not "streamlining"; it is a removal of accountability that has historically saved mature trees from unnecessary destruction. This risks unchecked labeling of trees as "hazardous" without clear definitions, public input, or recourse, while online-only notices exclude many residents.

Betraying City Promises and Contradicting Protective Policies Elsewhere
These developer-friendly changes prioritize short-term efficiency over accountability, unlike robust appeal processes in cities such as Beverly Hills, Pacifica, Los Altos, Mountain View, Santa Cruz, Saratoga, San Luis Obispo, Santa Monica, and Pasadena. They undermine the Urban Forest Plan, federal Justice40 commitments, and environmental goals—while areas like 94105 suffer from unchecked concrete expansion.

Furthermore, we request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover percentages (e.g., below 10% from DataSF or lidar analyses), environmental burden scores (from CalEnviroScreen or local tools), heat vulnerability indices, pollution exposure, and socioeconomic factors. Without this definition—accompanied by published criteria, maps, and enforceable spending requirements—the in-lieu fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

We urge you to **continue** this item until these essential democratic and equitable protections are restored and strengthened. Please reject Board File 251211 entirely or amend it so that:

1. In-lieu payments are limited to truly infeasible sites (where planting is impossible, impracticable, or unsafe), rather than serving as a default option for

any project.

2. The fee reflects the full cost of planting, establishment, irrigation, and long-term maintenance—not a bargain-rate substitute.
3. Spending is statutorily targeted to defined low-canopy and high Environmental Justice burden communities, with published criteria, maps (based on census tract data for canopy below 10% and vulnerability indices), and enforceable timelines for deployment and annual transparent reporting.
4. The ordinance preserves appeal rights for all tree removals and requires written, publicly posted findings and evidence for any “hazard” designation to maintain public oversight and prevent abuse.
5. The City fully complies with California’s Mitigation Fee Act requirements (Government Code § 66000 et seq.), including establishing a clear nexus between the fee and development impacts, segregating and accounting for revenues, providing regular public reporting, and ensuring lawful use of funds for their intended purpose.

We cannot afford more barren streets in our skyline-dominated neighborhood. My family demands you reject File No. 251211 entirely and strengthen mandates for on-site planting and public appeals to deliver real trees where new development is transforming our community.

Regards,

The Fong Family
94105 Resident & Native San Franciscan
Rincon Hill / South Beach / SoMa, San Francisco, CA

From: Glenn Rogers
To: CPC-Commissions Secretary; Carroll, John (BOS); MelgarStaff (BOS); Board of Supervisors (BOS)
Subject: TREE CANOPY APPEAL PROCESS
Date: Thursday, March 12, 2026 8:26:17 AM
Attachments: APPEAL PROCESS FOR TREE REDUCTION.pdf

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Hello,

Please, provide this letter in the records for the reduction of the time involved in the Appeal process for tree removal.

Thank you,

Glenn Rogers, RLA
Landscape Architect
License 3223
email: glennmandu@mac.com
website: alderlandscapearchitecture.com
cell: 415 875 0412

From: Michael Nulty
To: CPC-Commissions Secretary; boardofsupervisors@sfgov.org
Subject: Board File 251211 (Street Tree Ordinance) Talking points & Media article
Date: Thursday, March 12, 2026 10:25:06 AM

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Speaker: Michael Nulty, Citizen Planner, Tenderloin Resident & San Francisco Native

Opening

Good [morning/afternoon], Chair and Members of the Land Use Committee, Planning Commission, and Urban Forestry Council.

My name is Michael Nulty. I'm a citizen planner and lifelong San Francisco native, now a proud resident of the Tenderloin—one of our city's densest, most underserved, and environmentally burdened neighborhoods. Through my work in community planning, I witness daily how development decisions directly impact our streets, health, and quality of life. Today, I speak with deep conviction to strongly oppose Board File 251211 as currently drafted.

Core Message
San Francisco urgently needs *more* trees to become a healthier, cooler, and truly equitable city—not new loopholes that let developers skip planting them, especially in low-canopy priority areas like the Tenderloin, Civic Center, and South of Market, where major projects are advancing right now.

Key Reasons for Opposition
Catastrophic Impact on the Tenderloin and Similar High-Burden Neighborhoods
The Tenderloin has one of the city's lowest street tree canopies—often under 3–4% in many blocks, alongside SoMa and Chinatown—far below the citywide average of 13.7%. Our concrete-heavy streets worsen urban heat islands, trap traffic pollution, and leave residents exposed to extreme heat, poor air quality, and wildfire smoke. As an Environmental Justice community, we already face stark disparities: just 0.2 acres of open space per 1,000 people compared to 5 acres citywide. Allowing low in-lieu fees of only $2,590 per tree, vague "alternative landscaping," or ADU exemptions will leave new developments treeless precisely where greening is most critical for public health and equity.

Threatens Federal Equity Investments and the Development Pipeline
The Tenderloin is a top target for the $12 million federal Inflation Reduction Act grant awarded to plant thousands of street trees in low-canopy, heat-vulnerable areas like ours. Right now, numerous affordable housing, mixed-use, and community projects are in the pipeline across the Tenderloin, Civic Center, and nearby districts, seeking financing and approvals. Weakening mandatory on-site planting risks undermining this federal funding, derailing equitable greening tied directly to new builds, and squandering the chance to integrate trees into developments that could transform our streets for the residents who need them most.

Severs Reliable Tree Addition Amid Chronic Underfunding
With massive budget deficits—closing over $800 million in FY 2025-26 and projections exceeding $1 billion—Public Works' Urban Forestry division depends heavily on grants and developer mandates to add new street trees. Expanding in-lieu fees shrinks this vital pipeline at the worst possible time, just as many projects could deliver on-site trees if requirements stay strong.

Destroys Democratic Oversight and Accountability
Eliminating public appeals for City-initiated tree removals isn't streamlining—it's removing essential safeguards that protect mature trees from unnecessary loss. Without clear "hazard" definitions, written and public findings, and preserved appeal rights, this opens the door to unchecked removals. Shifting to online-only notices further excludes vulnerable residents in communities like mine who rely on accessible, in-person engagement.

Broad Coalition Opposition
This proposal faces widespread opposition: over 800 petition signatures, plus business associations, labor unions, tenant groups, neighborhood organizations like Theatre District Neighbors and North of Market Business Association, fellow citizen planners, property owners, and taxpayers. It undermines equity commitments, Justice40 principles, and the goals

of our Urban Forest Plan.

What We Demand – Strong Call to Action
I urge you to reject Board File 251211 outright or continue the item until strong protections are restored. At minimum, amend it to:

- Limit in-lieu payments to truly infeasible sites only (impossible, impracticable, or unsafe)—not as a routine developer option.
- Set fees high enough to cover full planting, establishment, irrigation, and long-term maintenance costs—not a bargain substitute.
- Statutorily target spending to low-canopy, high-burden communities like the Tenderloin, using clear, data-driven criteria (canopy <10%, CalEnviroScreen scores, heat vulnerability maps), with enforceable timelines and annual public reporting.
- Preserve appeal rights for all removals and require detailed, publicly posted written findings and evidence for any "hazard" designation.
- Ensure full compliance with California's Mitigation Fee Act, including nexus requirements, fund segregation, and transparent reporting.

Closing
As a citizen planner and Tenderloin resident, I see the wave of upcoming developments not as a burden, but as our best opportunity for meaningful greening. We cannot afford more heat-trapping, barren streets while families and vulnerable neighbors suffer the consequences. Please reject this ordinance or strengthen it substantially to deliver the trees, equity, and oversight our city needs most.

Thank you—I welcome any questions.

Recent news article
Attempt to save three trees shows limits of public's power



Attempt to save three trees shows limits of public's power

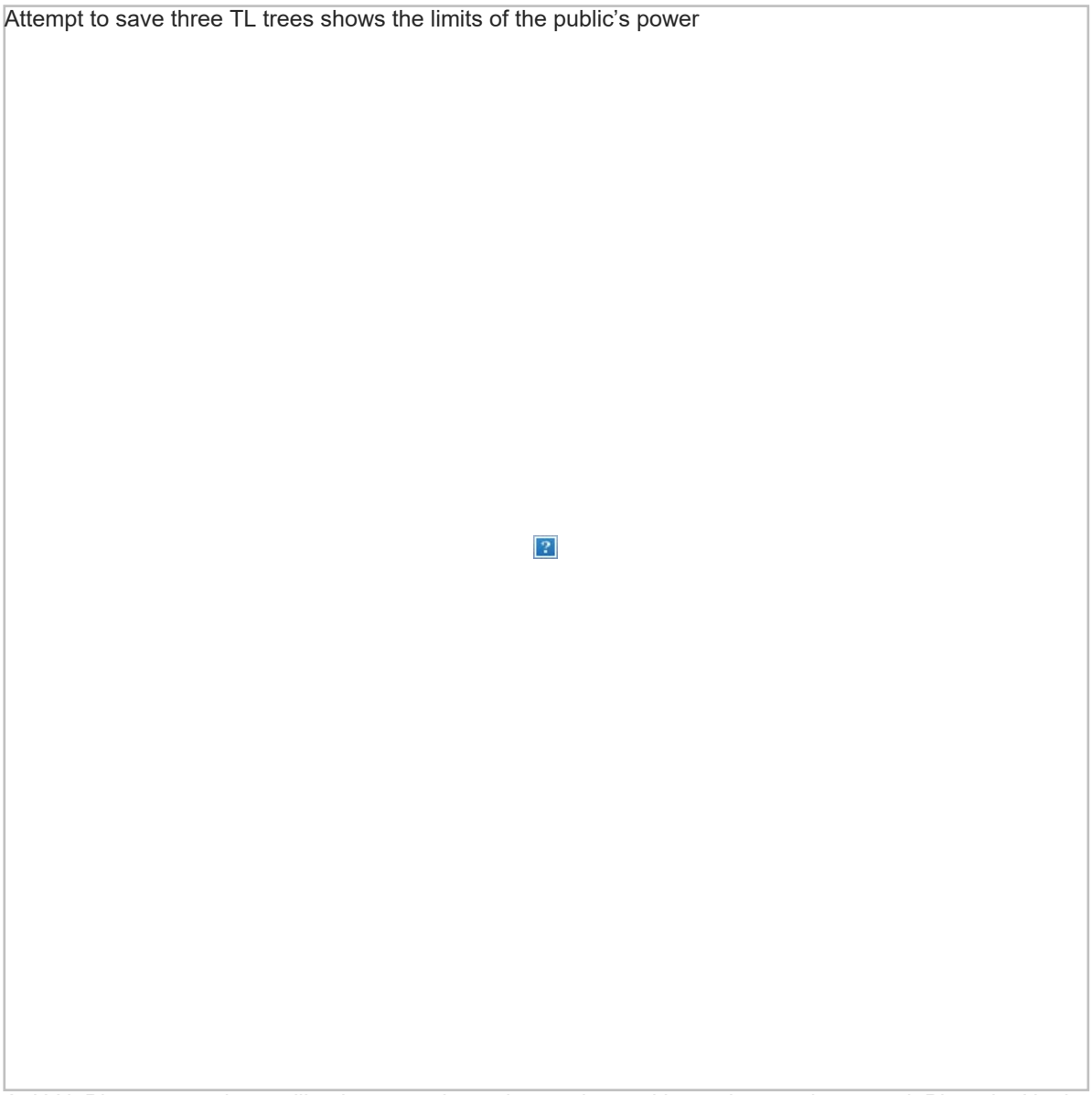
The city broke its own rules. Now it wants to change them.

Attempt to save three TL trees shows the limits of the public's power

The trees that inspired an appeal are gone. The ability to make that type of appeal could be next.

LAURA WENUS

Attempt to save three TL trees shows the limits of the public’s power



At U.N. Plaza, several trees like the ones pictured were deemed hazardous and removed. Photo by Noah Arroyo.

March 10 202610:59 AM6 MIN READ SHARE

Let’s say a city department plans to remove a tree on your street. Should you, a member of the public, be able to intervene? Should your objection trigger hearings that force officials to show up, listen, and consider changing course?

City decisionmakers are weighing these questions as they consider a package of tree-related reforms put forward by San Francisco Mayor Daniel Lurie, intended to cut administrative red tape. The proposed legislation would limit the public’s ability to appeal tree removals done by the city. It would also let private developers pay a fee instead of planting the trees that would otherwise be required on their real estate projects.

The Planning Commission will consider the in-lieu fee aspect of the legislation this Thursday, and a Board of Supervisors committee is expected to take up the full package later in the month. Many residents have written to the city calling this an anti-transparency move that reduces government accountability and threatens the city's already sparse urban canopy.

But the proposal prunes back a public right that is already difficult to exercise effectively. Under the status quo, there's no guarantee the government won't ignore an appeal in the first place. That's what happened at U.N. Plaza in early 2025, when the city broke its own rules to remove a handful of trees, then sought and abandoned an effort to fine itself for the infraction. The case would have flown under the radar were it not for a local advocacy group called the Tenderloin Tree Campaign. In fact, that incident rankled oversight commissioners so much they actually called for the public's right to appeal to be strengthened.

"A department head, somebody, made the decision: Screw the citizenry, screw the protocol," said Board of Appeals Commissioner Rick Swig at an October hearing on the matter. "At the end of the day, where's the accountability?"

Here's what happened.

The trees slated to be taken out — deemed "hazardous" but not in need of emergency removal — were supposed to stay in the ground for 15 days, long enough to give members of the public a chance to object. The Tenderloin Tree Campaign did so by filing an appeal. But the Recreation and Parks Department removed the trees before the appeal window had elapsed.

This process led to a hearing before the Board of Appeals, where commissioners rebuked the parks department and deliberated over what power they had to make city officials follow these laws.

Dan Mauer, a project manager with the parks department, told the commissioners that officials had been under pressure to take the trees out in time for an event celebrating the completion of the new skate park at U.N. Plaza.

This did not sit well with the commissioners, who grilled Mauer on who had made the decision (the implied answer was then-director Phil Ginsburg) and whether the department's oversight body had been consulted (it had not). Commissioner Swig said the decision to remove the trees so quickly disrespected Tenderloin Tree Campaign leader John Nulty and his brother Michael, and their appeal. Swig encouraged the department to formally apologize to the Nultys (Mauer said he had done so) and recognize them for their decades of advocacy work.

"Trees were something that was secondary to me 10 years ago. These guys have really brought me

around, personally, and I thank them for that," Swig said.

But mostly, the commissioners seemed frustrated by the shortcomings of the appeal mechanism itself. If the mandatory waiting period couldn't keep an antsy city department from going ahead with a project, then what would?

One possible answer: the threat of a fine. The city could punish itself (one department could fine another) for violating the appeal procedure. The Department of Public Works, which has jurisdiction over U.N. Plaza, had in fact moved to fine the parks department $30,000.

The parks department objected. At the hearing, representatives laid out their reasoning: They were already spending more than $30,000 on *new* trees. Not only were they replacing those they had illegally removed, they were adding many more, to replace trees that Public Works had taken out. And they were also covering the high cost of irrigating those trees.

In the end, Public Works would agree, and choose not to impose the penalty.

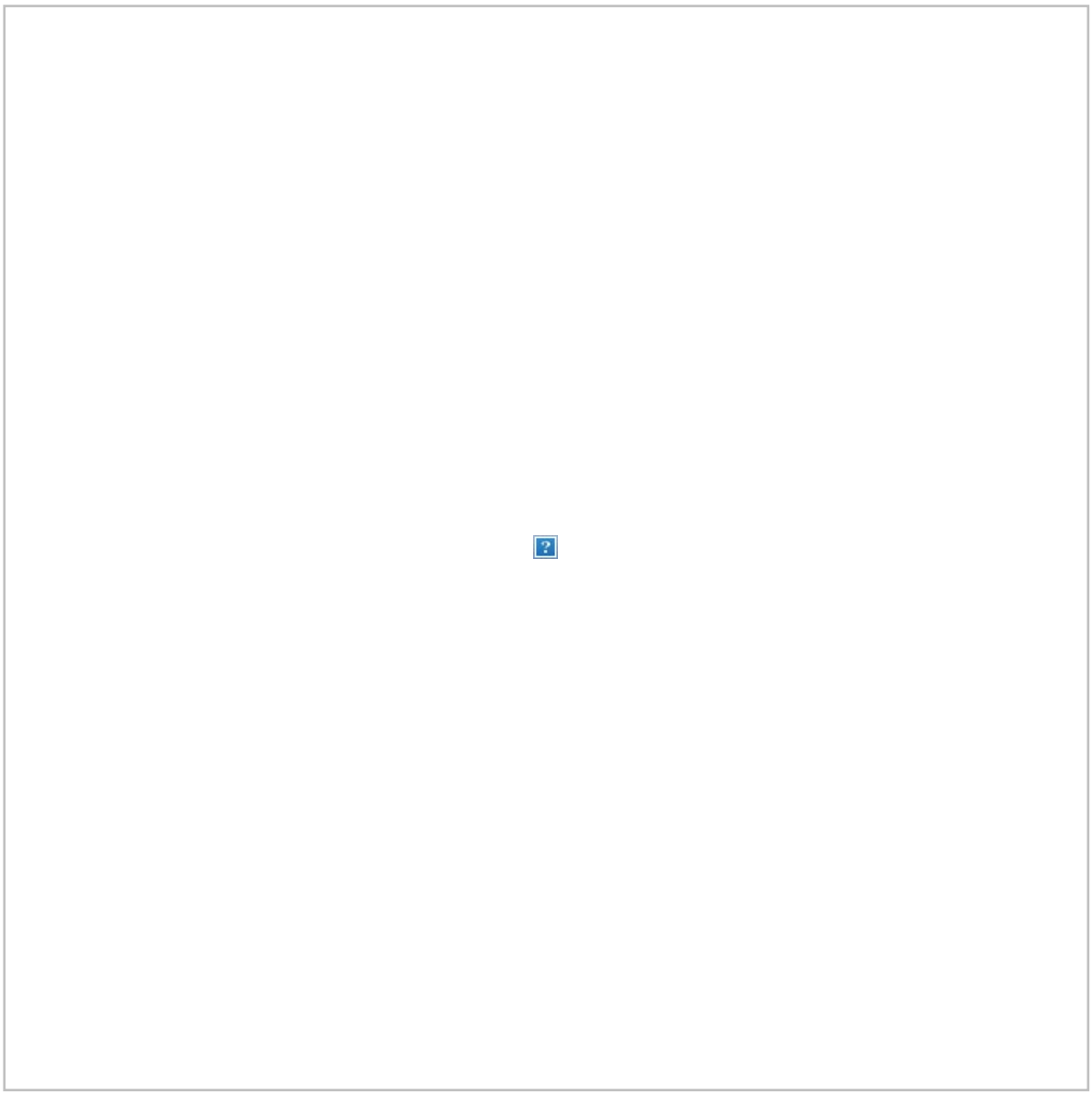
"While a fine is punitive, the remedy of planting 23 new trees — getting them in the ground and, as importantly, doing irrigation for them — is what we wanted to see happen," Public Works spokesperson Rachel Gordon later told me. "So there's a greater benefit than just having the fine."

Here's the thing, though: That decision wasn't reached until *after* the Appeals commissioners had their discussion. And, not knowing whether a fine would be imposed, commissioners were very unhappy with the prospect that this was the best compliance tool available. For one thing, the Board of Appeals had virtually no power here. It wasn't up to them to decide on the fine or what the parks department should do to make up for its actions. They could decide only whether the removal permit had been properly issued. Beyond that, all they could do was make recommendations. Second, they were exasperated with the idea that taxpayer money would be used to correct a department's scofflaw behavior.

"It's the city paying the city," said Board President John Trasviña. "So how does that discourage this conduct?"

Mauer, from the parks department, responded with an apparently nervous laugh that the deterrent was "coming and getting yelled at in front of the Board of Appeals."

"I don't have a long-term response on how others will act down the line," he said. "This is something that we don't take lightly and it wasn't a decision that was made flippantly."



The smaller, younger trees on the right were planted to replace mature trees that had been deemed dangerous and removed. Photo by Laura Wenus.

The commissioners felt strongly that the public right to appeal deserved to be strengthened. Weeks after the hearing, they sent a letter to the Board of Supervisors and the mayor, explaining the procedural breach, how little could have been done to prevent it, and that better enforcement mechanisms were needed.

But that letter may have fallen on deaf ears at the Mayor's Office, which at the time was putting forward the proposed legislation I mentioned at the beginning. That proposal would eliminate the appeals process altogether for cases when city departments remove hazardous trees. It would also take other tree removal cases out of the hands of the Board of Appeals, an entity without skin in that game. Instead, the Director of Public Works would decide on the appeal.

It's not clear if what happened at U.N. Plaza inspired the legislation. The Mayor's Office did not

return a request for comment. The proposal was originally presented as an effort to streamline the city's permitting and regulatory processes.

Josh Klipp, a self-described "recovering" attorney who helped the Nultys file the U.N. Plaza tree appeal, was deeply dismayed by the proposal. Klipp co-founded a program that came to be known as "Mission Verde," through which the city and Mission District community members collaborate to care for street trees. That effort, Klipp said, began when the city moved to take out trees along the 24th Street corridor, and members of the public appealed. If the mayor's proposed legislation had been in place then, the city would have removed the trees without fanfare and the discussions and negotiations that led to the creation of Mission Verde would never have happened.

The appeals in the Mission were "more than just about trees," Klipp said. "This is about how this community felt. How they were being treated without their input, without their involvement."

Michael Nulty
P.O. Box 420782
San Francisco, CA 94142-0782
(415) 339-8779 - Alliance for a Better District 6

From:	Carolyn
To:	CPC-Commissions Secretary; Carroll, John (BOS); Melgar, Myrna (BOS); Chen, Chyanne (BOS); Mahmood, Bilal (BOS)
Cc:	ChenStaff; MelgarStaff (BOS); MahmoodStaff; Gluckstein, Lisa (CPC); Lozano, Jesus (ENV); DPW, Urbanforestry (DPW); Short, Carla (DPW); Moore, David (DPW)
Subject:	Amend File 251211: Stop the Unregulated In-Lieu Fee Expansion
Date:	Thursday, March 12, 2026 1:14:37 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Members of the Land Use Committee, Planning Commission, and Urban Forestry Council, I am writing to oppose the street tree legislation in Board File 251211. Allowing developers to pay a $2,590 fee instead of planting a street tree is a gift to the real estate industry. I live in D4 and although Supervisor Alan Wong sponsored this legislation HE IS WRONG. Developers will choose the fee over navigating the City's planting requirements. The City must focus on streamlining the permitting process rather than allowing developers to buy their way out of providing essential green infrastructure. This legislation is being sold under a false equity narrative. The legislative digest claims these pooled fees will go to "low-canopy areas." The actual text of the ordinance deposits these fees into the general Adopt-A-Tree Fund with no geographic spending restrictions. Without a statutory requirement to spend these funds in designated Environmental Justice communities, this expansion creates an unregulated slush fund. Public Works cannot manage its existing in-lieu fees. In February 2023, the department collected $242,000 from UCSF to plant 105 replacement trees. Exactly zero have been planted so far. The department is not even using the funds they have right now. Furthermore, the department administratively canceled over 900 active 311 requests for tree replacement in empty sidewalk basins in December 2025. The legislation also eliminates the public right to appeal "hazard" tree removals without defining what constitutes a hazard. This allows the City to label any inconvenient tree as hazardous to fast-track its removal without public oversight. The City must reject this proposal entirely or substantially amend it. Any amendment must raise the fee to reflect the true cost of planting and maintaining a tree. It must strictly dictate where the funds are spent using clear definitions for "high environmental justice burden" and "low canopy." Finally, it must preserve the public's right to appeal tree removals and mandate transparency for hazard designations. Sincerely,
Carolyn Blakeslee
Lakeshore Neighborhood

From: Melinda Dart
To: Carroll, John (BOS)
Subject: For Members of the Land Use Transportation Committee
Date: Wednesday, March 11, 2026 6:19:27 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

March 11, 2026

Dear Supervisor Mahmood, Supervisor Chen, and Supervisor Melgar,

,

On March 23rd or 30th (tbd), the Land Use Transportation Committee will consider the Mayor's full proposed amendments to our street tree legislation: (1) give developers the choice to plant or not; (2) eliminate the public's right to appeal trees that are designated as "hazards"; (3) and allow the public to appeal City-initiated tree removals but only on a compressed time schedule that could, in essence, curtail the public's ability to mount an effective defense of our trees.

Our tree canopy is the smallest in any major urban city. Our City Charter stipulates that we should increase our urban forest, but instead we have lost hundreds of trees since 2017.

Do not gift developers the chance to pay "in lieu" fees. This will result in fewer trees.

Last year, I myself had a street tree that was deemed a hazard and needed to come down. I did not fight this designation. The tree came down and I planted a new native tree. But there have been instances of trees being called "hazardou"s in error, as happened on De Haro St last year. Mistakes are made. Do not take away our right to appeal these decisions.

Most City projects are years in the making. In contrast, the average appeal time is 75 days, start to finish. Trees are not the hold up on development.

Trees add vibrancy, walkability, a connection to nature, a place for birds, to our neighborhood and make them more livable. We are thousands of trees behind what is called for in our City's own Climate Action Plan - a plan created in response to the 2019

Declaration that we are in a Climate Emergency. **It is astounding that, as our climate rapidly deteriorates, we are playing games with this critical aspect of our City's climate resilience rather than doubling down on protecting and planting more trees.** Don't take away the public's right to fight for our trees. Vote no.

Sincerely,

Melinda Dart

163 Sears St

San Francisco, CA 94112

From: John Trasvina
To: Carroll, John (BOS)
Subject: Re: Date of next Land Use Committee meeting
Date: Thursday, January 15, 2026 11:07:42 AM

Thank you. It's Item 251-211.

On Thu, Jan 15, 2026 at 11:04 AM Carroll, John (BOS) <john.carroll@sfgov.org> wrote:

> The next meeting of LUT is January 26, 2026.
>
> What is the Board File No. for the matter you're following?
>
> JEC
>
> ---
>
> **From:** John Trasvina <trasvina2@gmail.com>
> **Sent:** Thursday, January 15, 2026 11:02 AM
> **To:** Carroll, John (BOS) <john.carroll@sfgov.org>
> **Subject:** Date of next Land Use Committee meeting
>
> This message is from outside the City email system. Do not open links or attachments from untrusted sources.
>
> Dear Mr. Carroll:
>
> I am president of the Board of Appeals. The Land Use Committee has legislation before it that affects the jurisdiction of our Board.
>
> Can you tell me whether the Monday holiday next week means that the next possible date of the Land Use Committee meeting is Monday, January 26 or might it meet prior to then?
>
> Thank you.

John Trasvina

President

SF Board of Appeals

From: Glenn Rogers
To: CPC-Commissions Secretary; Carroll, John (BOS); MelgarStaff (BOS); Board of Supervisors (BOS)
Subject: TREE CANOPY APPEAL PROCESS
Date: Thursday, March 12, 2026 8:26:19 AM
Attachments: APPEAL PROCESS FOR TREE REDUCTION.pdf

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Hello,

Please, provide this letter in the records for the reduction of the time involved in the Appeal process for tree removal.

Thank you,

Glenn Rogers, RLA
Landscape Architect
License 3223
email: glennmandu@mac.com
website: alderlandscapearchitecture.com
cell: 415 875 0412

Coalition for San Francisco Neighborhoods

TO THE PLANNING COMMISSION, THE LAND USE AND TRANSPORTATION COMMITTEE AND THE BOARD OF SUPERVISORS

March 12, 2026

The desire to provide developers $2,590 for in lieu fees for not planting trees is a gift to developers. This is because the City has no mechanism to plant trees anywhere else after giving the developers this in lieu fee. Additionally, this proposal does not streamline the developing process, it only makes it easier to remove unwanted trees.

Those that oppose the reduction of the Appeal process are not against removing dangerous trees that can injure the public. Those that oppose a shorter Appeal process are afraid it will be misused to remove trees to satisfy developer's goals and wishes.

"In short, now is not the time to be passing laws that reduce our tree canopy, its oversight, and the public's right to stand up for the few trees we have. San Francisco has the smallest urban forest of any major city in the United States. And, since 2017, *we have net lost hundreds of street trees*. Further, we are thousands of trees behind what is called for in our City's own Climate Action Plan - a plan created in response to the 2019 Declaration that we are in a Climate Emergency. It is astounding that, as our climate rapidly deteriorates, we are playing games with this critical aspect of our City's climate resilience rather than doubling down on protecting and planting more trees.," says Joshua Klipp, Esq..

Today. the average Appeal time for tree review is 75 days. Since the normal review process in the development of a project takes years to complete, this Appeal process is not a burden to developers.

We ask the Planning Commission and the Land Use and Transportation Committee to not attack our meager tree canopy in the City and allow the Appeal process for tree removal to remain as is, please?

Thank you,

Glenn Rogers, RLA
Landscape Architect
License 3223
Chair CSFN Open Space Committee

From: Robert Ogilvie
To: CPC-Commissions Secretary
Cc: Patricia Handeland; Matt Friese; robin@streetsforall.org; Chandra Friese; Peter Fortune; Robin Pam; Leah Culver; Thomas Butler; WongStaff (BOS); SauterStaff; SherrillStaff; Walton, Shamann (BOS); MelgarStaff (BOS); MandelmanStaff (BOS); Fielder, Jackie (BOS); Carroll, John (BOS); ChenStaff; MahmoodStaff; DorseyStaff (BOS); ChanStaff (BOS)
Subject: San Francisco Beautiful"s position on pending Street Trees Legislation
Date: Thursday, March 12, 2026 8:09:34 AM
Attachments: image.png

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

To the Members of the Planning Commission:

San Francisco Beautiful respectfully submits the following comments regarding **File #251211**, which proposes amendments to Article 16 of the San Francisco Public Works Code governing street trees.

Founded in 1947 when Friedel Klusmann successfully led the effort to preserve San Francisco's cable cars, San Francisco Beautiful has long worked to protect and enhance the beauty and livability of our city. A central part of that mission is safeguarding and expanding San Francisco's street tree canopy.

San Francisco already has one of the **smallest urban tree canopies of any major U.S. city**. At a time when cities across the country are working to increase tree cover for climate resilience, public health, and neighborhood quality of life, San Francisco should be pursuing policies that **maintain and expand our tree canopy—not reduce it**.

At the same time, San Francisco Beautiful recognizes the importance of **streamlining permitting processes** to support housing development and other important city priorities. We believe that efficient permitting and strong urban forestry protections can and should coexist.

However, we are concerned about the proposal to eliminate the public's ability to appeal certain City-initiated tree removals. Community input has historically played an important role in ensuring thoughtful decisions about the removal and replacement of street trees. Maintaining an opportunity for community review helps ensure transparency, accountability, and better outcomes for the city's urban forest.

Rather than eliminating community input, we encourage the City to consider **stronger mitigation measures** that better protect San Francisco's tree canopy while allowing development to move forward. In particular, we recommend:

• **Substantially increasing the in-lieu fee** for tree removals so that it more accurately reflects the value of mature street trees and supports meaningful canopy replacement.

• **Requiring developers who remove street trees to plant replacement trees in existing vacant tree wells** throughout the city. Thousands of empty tree wells already exist on San Francisco streets, representing an immediate opportunity to expand the urban canopy.

These measures would allow San Francisco to pursue housing and development while also

strengthening the green infrastructure that makes our city more livable and resilient.

San Francisco's street trees are not simply decorative. They provide shade, improve air quality, manage stormwater, and contribute to the character of our neighborhoods. Policies governing their removal should therefore prioritize **long-term canopy growth, transparency, and public trust**.

Thank you for your continued service and for considering these comments.

Respectfully,

--
Robert Ogilvie
Chief Executive Officer
San Francisco Beautiful
https://sfbeautiful.org/



From: dweller SF
To: CPC-Commissions Secretary
Cc: Board of Supervisors (BOS); Carroll, John (BOS)
Date: Thursday, March 12, 2026 6:09:27 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Members of the Land Use Committee, Planning Commission, and Urban Forestry Council,

As a resident of ZIP code 94105 in the Rincon Hill, South Beach, and South of Market (SoMa) area—one of San Francisco's fastest-growing neighborhoods dominated by high-rises and with critically low tree canopy coverage of approximately 4-5% (far below the citywide average of 13.7%), including areas like South Beach and parts of SoMa with very little tree cover—I and my family are vehemently opposed to the proposed amendments in Board File 251211. Our concrete-heavy streets already create severe urban heat islands, poor air quality, and extreme vulnerability to wildfire smoke and heat waves. These changes would exacerbate environmental inequities by letting developers skip on-site tree planting in the very places experiencing intense new development.

We need more trees to make SF an even better city. San Francisco's urban canopy remains one of the lowest among major U.S. cities, and neighborhoods like ours suffer disproportionately, with street tree canopy in South of Market and Civic Center at just 4.1%. This scarcity intensifies heat (temperatures 10–20°F higher than greener areas), worsens air pollution from nearby freeways and traffic, and heightens risks during California's wildfires and droughts—we endured weeks of hazardous orange skies and smoke in 2020. Residents here face elevated threats of heat-related illness, respiratory problems, and other climate impacts. More trees would provide essential shade, cleaner air, stormwater mitigation, and a healthier, more livable environment for families, workers, and visitors in our high-density district.

This opposition is widespread: An online petition has garnered over 800 signatures, and a broad coalition—including business associations, labor unions, tenant groups, neighborhood associations, citizens planners, property owners, taxpayers, and many others—is firmly opposing the legislation as written. And found in public comments section letter from many community groups highlighting how these changes weaken protections and fail to deliver equitable greening.

Key Reasons for Opposition:
Devastating Blow to Greening in High-Density, Low-Canopy Areas Like 94105
Rincon Hill, South Beach, and SoMa have some of the lowest street tree canopy in the city—around 4.1% in parts of SoMa—with vast stretches of pavement and towering buildings offering little shade. These areas are priority zones for the $12 million federal Inflation Reduction Act grant awarded to San Francisco Public Works in 2023, targeting low-canopy, heat-vulnerable neighborhoods including SoMa to

plant 3,500 new street trees and create green jobs. Allowing developers to pay in-lieu fees instead of planting on-site—or exempting accessory dwelling units (ADUs)—would undermine this critical effort, leaving new luxury high-rises without greenery and denying residents immediate cooling and cleaner air amid booming development.

Undermining Our Primary Source of New Trees Amid Severe Budget Crises
With the City's historic budget deficits—closing an $800+ million shortfall in FY 2025-26 and facing projections up to $1 billion or more in coming years—Public Works' Urban Forestry programs are chronically underfunded, relying heavily on grants and external sources. Mandatory tree planting from new development has become the main reliable way San Francisco adds street trees. Expanding in-lieu fees and exemptions would sever this vital pipeline, stalling greening in fast-developing areas like mine where every tree is essential.

Exacerbating Life-Threatening Health and Climate Risks
Low tree canopy in 94105 leads to temperatures 10–20°F higher than greener neighborhoods, worsened air quality from traffic and freeways, and severe impacts from wildfires and droughts. Eliminating the public's right to appeal City-initiated tree removals erodes critical oversight—removing due process is not "streamlining"; it is a removal of accountability that has historically saved mature trees from unnecessary destruction. This risks unchecked labeling of trees as "hazardous" without clear definitions, public input, or recourse, while online-only notices exclude many residents.

Betraying City Promises and Contradicting Protective Policies Elsewhere
These developer-friendly changes prioritize short-term efficiency over accountability, unlike robust appeal processes in cities such as Beverly Hills, Pacifica, Los Altos, Mountain View, Santa Cruz, Saratoga, San Luis Obispo, Santa Monica, and Pasadena. They undermine the Urban Forest Plan, federal Justice40 commitments, and environmental goals—while areas like 94105 suffer from unchecked concrete expansion.

Furthermore, we request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover percentages (e.g., below 10% from DataSF or lidar analyses), environmental burden scores (from CalEnviroScreen or local tools), heat vulnerability indices, pollution exposure, and socioeconomic factors. Without this definition—accompanied by published criteria, maps, and enforceable spending requirements—the in-lieu fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

We urge you to **continue** this item until these essential democratic and equitable protections are restored and strengthened. Please reject Board File 251211 entirely or amend it so that:

1. In-lieu payments are limited to truly infeasible sites (where planting is impossible, impracticable, or unsafe), rather than serving as a default option for

any project.

2. The fee reflects the full cost of planting, establishment, irrigation, and long-term maintenance—not a bargain-rate substitute.
3. Spending is statutorily targeted to defined low-canopy and high Environmental Justice burden communities, with published criteria, maps (based on census tract data for canopy below 10% and vulnerability indices), and enforceable timelines for deployment and annual transparent reporting.
4. The ordinance preserves appeal rights for all tree removals and requires written, publicly posted findings and evidence for any “hazard” designation to maintain public oversight and prevent abuse.
5. The City fully complies with California’s Mitigation Fee Act requirements (Government Code § 66000 et seq.), including establishing a clear nexus between the fee and development impacts, segregating and accounting for revenues, providing regular public reporting, and ensuring lawful use of funds for their intended purpose.

We cannot afford more barren streets in our skyline-dominated neighborhood. My family demands you reject File No. 251211 entirely and strengthen mandates for on-site planting and public appeals to deliver real trees where new development is transforming our community.

Regards,

The Fong Family
94105 Resident & Native San Franciscan
Rincon Hill / South Beach / SoMa, San Francisco, CA

From: Theatre District Neighbors
To: Board of Supervisors (BOS)
Cc: CPC-Commissions Secretary
Subject: Please Amend File 251211: Stop the Unregulated In-Lieu Fee Expansion
Date: Thursday, March 12, 2026 5:48:08 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Members of the Land Use Committee, Planning Commission, Urban Forestry Council, and elected officials:

Theatre District Neighbors is writing to strongly oppose the provision in Board File 251211 that eliminates the public's right to appeal City-initiated tree removals. Removing due process is not "streamlining"; it is a dangerous erosion of critical oversight that has historically protected mature trees from unnecessary destruction. This change risks allowing City departments and commissions to label and remove trees as "hazardous" without clear justification, public input, or recourse—undermining decades of community advocacy for preserving our urban forest in dense, low-canopy areas like the Tenderloin, Civic Center, and surrounding Theatre District neighborhoods.

San Francisco desperately needs more trees to make our city an even better place to live, work, and visit. Our urban canopy remains among the lowest in major U.S. cities at approximately 13-14% overall, with neighborhoods in the Theatre District and adjacent areas often faring worse due to dense development, concrete-heavy streetscapes, and historical underinvestment in greening. Expanding tree coverage here would provide essential shade to combat urban heat, improve air quality amid traffic and pollution, reduce stormwater runoff, enhance mental health and community well-being through calming green spaces, and create more inviting public realms for residents, theatergoers, workers, and visitors.

Furthermore, we request that the legislation be amended to strictly define "low tree canopy" neighborhoods using a transparent, data-driven methodology. This should incorporate current canopy cover percentages (e.g., from Planning Department or DataSF analyses showing coverage below 10% in many underserved tracts), environmental burden scores (such as those from CalEnviroScreen or local Environmental Justice mapping tools), heat vulnerability indices, pollution exposure, and socioeconomic factors. Without such clear, statutory definitions—accompanied by published criteria, maps, and enforceable spending requirements—the in-lieu fee mechanism risks becoming an unregulated slush fund. Collected fees could fail to reach the neighborhoods with the highest environmental burdens and greatest need for equitable greening, instead being dispersed without accountability or measurable impact.

We urge you to **continue** this item until these essential democratic and equitable protections are restored and strengthened. Specifically, please reject Board File

251211 or amend it so that:

1. **In-lieu payments are limited to truly infeasible sites (where planting is impossible, impracticable, or unsafe), rather than serving as a default option for any project.**
2. **The fee reflects the full cost of planting, establishment, irrigation, and long-term maintenance—not a bargain-rate substitute.**
3. **Spending is statutorily targeted to defined low-canopy and high Environmental Justice burden communities, with published criteria, maps (based on census tract data for canopy below 10% and vulnerability indices), and enforceable timelines for deployment and annual transparent reporting.**
4. **The ordinance preserves appeal rights for all tree removals and requires written, publicly posted findings and evidence for any "hazard" designation to maintain public oversight and prevent abuse.**
5. **The City fully complies with California's Mitigation Fee Act requirements (Government Code § 66000 et seq.), including establishing a clear nexus between the fee and development impacts, segregating and accounting for revenues, providing regular public reporting, and ensuring lawful use of funds for their intended purpose.**

San Francisco's future depends on bold, equitable investments in our urban forest—not loopholes that weaken protections and delay meaningful canopy growth. Theatre District Neighbors stands ready to support policies that truly prioritize more trees, stronger oversight, and environmental justice for all residents.

Sincerely,

Theatre District Neighbors

--

Theatre District Neighbors

P.O. Box 420846

San Francisco, CA 94142-0846

theatredistrictneighbors@gmail.com

(415) 339-8779

https://atasf7.wixsite.com/tdneighbors

From: NorthofMarket BusinessAssociation
To: CPC-Commissions Secretary; Board of Supervisors (BOS)
Subject: Amend File 251211: Stop the Unregulated In-Lieu Fee Expansion
Date: Thursday, March 12, 2026 5:31:52 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Members of the Land Use Committee, Planning Commission, and Urban Forestry Council,

The North of Market Business Association is writing to express our firm opposition to the proposed ordinance in Board File 251211. This legislation, introduced by Mayor Daniel Lurie and Supervisor Alan Wong, would amend the Public Works Code to allow development projects to satisfy mandatory street tree planting requirements through payment of an in-lieu fee (currently set at $2,590 per tree) or by providing alternative landscaping; exempt accessory dwelling units (ADUs) from these requirements; eliminate the public's right to appeal tree removals initiated by City departments and commissions; and update in-lieu fee reporting requirements. It would further amend the Administrative Code to create a separate account within the Adopt-A-Tree Fund specifically for these in-lieu fees, and amend the Planning Code to align street tree applicability with these changes.

San Francisco's urban tree canopy remains critically low—approximately 13-14% citywide, with some neighborhoods like South of Market, the Tenderloin, and other Environmental Justice areas experiencing coverage as low as 4-7%. This deficiency exacerbates urban heat islands, poor air quality, and health disparities in dense commercial and mixed-use districts, including North of Market and adjacent areas where businesses and residents alike suffer from limited shade and greening.

As an association representing businesses in the North of Market area, we know firsthand the vital role that street trees play in creating vibrant, safe, and economically thriving commercial corridors. Beautification through mature street trees in front of all commercial spaces—especially those associated with new development projects—is essential. Trees provide essential shade that makes sidewalks more comfortable for pedestrians during San Francisco's warmer days, fostering a neighborly, friendly atmosphere that encourages lingering, social interaction, and foot traffic. Research consistently shows that tree-lined streets attract more customers: businesses on streets with healthy canopy coverage report higher income streams (often 12% or more), as shoppers prefer shaded, inviting environments that promote relaxation and reduce stress. The calming effects of trees—known to lower aggression, improve mental health, and enhance overall perceptions of safety—help deter crime by increasing "eyes on the street" through greater pedestrian presence and informal surveillance. Studies across U.S. cities, including Baltimore and Portland, demonstrate that higher tree canopy correlates with reduced rates of violent and property crimes, as well as lower stress and increased community cohesion. These benefits add tangible value to future businesses by boosting property appeal,

increasing customer draw, and supporting long-term economic vitality in commercial districts.

Allowing developers to default to a modest in-lieu fee or vague alternative landscaping will inevitably lead to fewer on-site street trees planted directly in front of new commercial and mixed-use developments—precisely where they deliver the most immediate benefits to businesses, employees, customers, and the surrounding community. Developers will opt for the low-cost fee to sidestep site constraints, maintenance responsibilities, and permitting complexities, resulting in lost opportunities for greening that could enhance safety, customer attraction, and neighborhood appeal. Exempting ADUs further limits potential canopy gains in residential-adjacent areas, while removing public appeal rights for City-initiated tree removals reduces accountability and risks unchecked eliminations that undermine existing beautification efforts.

Rather than weakening these requirements, the City must prioritize policies that aggressively expand the urban tree canopy, particularly in commercial and underserved areas, to support business success, public safety, and climate resilience. We urge the rejection of Board File 251211 in its entirety. If the proposal advances, it must be substantially amended so that:

1. In-lieu payments are limited to truly infeasible sites (where planting is impossible, impracticable, or unsafe), rather than serving as a default option for any project.
2. The fee reflects the full cost of planting, establishment, irrigation, and long-term maintenance (far exceeding the current $2,590 bargain-rate substitute) to discourage routine opt-outs and ensure adequate revenue for meaningful tree planting.
3. Spending is statutorily targeted to defined low-canopy and high Environmental Justice burden communities, with published criteria, maps (based on census tract data for canopy below 10% and vulnerability indices), and enforceable timelines for deployment and annual transparent reporting.
4. The ordinance preserves appeal rights for all tree removals and requires written, publicly posted findings and evidence for any “hazard” designation to maintain public oversight and prevent abuse.
5. The City fully complies with California’s Mitigation Fee Act requirements (Government Code § 66000 et seq.), including establishing a clear nexus between the fee and development impacts, segregating and accounting for revenues, providing regular public reporting, and ensuring lawful use of funds for their intended purpose.

San Francisco's businesses and residents deserve stronger protections for our urban forest, not loopholes that prioritize short-term development ease over long-term livability, safety, and economic health. Rejecting or meaningfully amending this proposal is essential to growing a greener, more welcoming, and prosperous city for

all.

Sincerely,

Karim Rantisi
Co-Founding member
North of Market Business Association

From:	Julia Lavroushin
To:	CPC-Commissions Secretary; Carroll, John (BOS); Melgar, Myrna (BOS); Chen, Chyanne (BOS); Mahmood, Bilal (BOS)
Cc:	ChenStaff; MelgarStaff (BOS); MahmoodStaff; Gluckstein, Lisa (CPC); Lozano, Jesus (ENV); DPW, Urbanforestry (DPW); Short, Carla (DPW); Moore, David (DPW)
Subject:	Amend File 251211: Stop the Unregulated In-Lieu Fee Expansion
Date:	Wednesday, March 11, 2026 10:00:16 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Members of the Land Use Committee, Planning Commission, and Urban Forestry Council,

I am writing to oppose the street tree legislation in Board File 251211.

We need the trees as they serve an important function. Builders should not be allowed to buy themselves out of this requirement while the City collects $$ and alleges to plant them somewhere else.

Take the tree out, you plant another in that space. Or more than one! Be good stewards of our city. Take the correct action.

Respectfully,

Julia Lavroushin
Richmond District

From: Alexander Hobbs
To: Carroll, John (BOS)
Subject: Legislation on Developers & Trees
Date: Wednesday, March 11, 2026 10:37:40 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Land Use Transportation Committee,

I am a resident of San Francisco, an Architect here in the city and a tree lover. I'm writing in opposition to legislation that would allow Developers to opt out of planting trees in exchange for a fee. This legislation complicates the building process, will work to slow San Francisco's climate goals and further burdens my community in our fight for a healthy environment.

1. Complicates the Building Process. In my opinion as an Architect, it's the "gray" areas of San Francisco's design and approval process that slows building. By allowing developers to have a choice in planting trees, means that neighbors of a proposed project can weigh in on this issue. While this might sound like a good thing, I think the reality is that there will likely be people for and against in every neighborhood. This will open yet another avenue for conflict and debate thus slowing more projects. The fewer variables in the process, the smoother and faster things will go.

2. No real savings for developers, big cost to communities, city & FUF . As an Architect, I don't think the current legislation requiring trees, slows or complicates the design/building process in any meaningful way. Trees are an extremely small budget number but do require planning and coordination. Not planning for them at the beginning makes it much harder to add later. This legislation would be a token gift to developers that comes at a larger cost to the health of our communities. The responsibility for planting then falls to the city and Friends of the Urban Forest (FUF) later which is completely inefficient. We know far too much about the benefits of tree lined streets to just give this away or not recognize it's importance to healthy neighborhoods. https://www.friendsoftheurbanforest.org/post/4-reasons-street-trees-matter

3. Further Strains Environmentally Burdened Neighborhoods. I live in the Portola District which is bound by freeways. The vast majority of planned development is in neighboring Bayview/Hunger's Point. We have the lowest trees canopy in the city and this legislation would work in opposition to neighborhoods like ours. It would take the onus off the city to require trees and puts it in our laps to organize and fight developers and potentially our neighbors to get them. That is unfair and only benefits high resource communities where people have more time to fight for their health. https://www.sf.gov/sites/default/files/2024-02/exhibitg_23_03_10_ejc_map_technical_documentation_transmittal_w_app.pdf

Thank you for your consideration,
Alex Hobbs
76 Karen Ct
San Francisco, CA 94134

From:	Kiran Sekhon
To:	CPC-Commissions Secretary; Carroll, John (BOS); Melgar, Myrna (BOS); Chen, Chyanne (BOS); Mahmood, Bilal (BOS)
Cc:	ChenStaff; MelgarStaff (BOS); MahmoodStaff; Gluckstein, Lisa (CPC); Lozano, Jesus (ENV); DPW, Urbanforestry (DPW); Short, Carla (DPW); Moore, David (DPW)
Subject:	Amend File 251211: Stop the Unregulated In-Lieu Fee Expansion
Date:	Wednesday, March 11, 2026 10:33:08 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Members of the Land Use Committee, Planning Commission, and Urban Forestry Council,

I am writing to oppose the street tree legislation in Board File 251211.

I am a full-blown YIMBY, and I want to support speeding up housing being built in the city. But I think some adjustments are needed before putting this legislation into action:

1. The best compromise is to allow developers a 1-2 year grace period on planting trees, so that tree planting doesn't hold up housing from being built and allowing people to move in.

2. There is ***already*** a clause that allows developers to pay in case a tree cannot be planted due to utility/safety/SFMTA stops in the vicinity. If the developer's pay a fee, that fee should go to a ***dedicated*** fund to support tree planting somewhere in the city, ideally in underserved neighborhoods. Developers usually focus on high-wealth neighborhoods, so dedicating the tree funds to lower-income neighborhoods could help. Currently the legislation has the money going to the General Fund, which has been mis-managed in the past.

3. It is unacceptable that 900 active tree requests in 311 were closed in December 2025. Those locations already have tree wells and it would be a quick win to plant a tree there.

Thank you,
Kiran Sekhon
Neighborhood: Cow Hollow

Allowing developers to pay a $2,590 fee instead of planting a street tree is a gift to the real estate industry. Developers will choose the fee over navigating the City's planting requirements. The City must focus on streamlining the permitting process rather than allowing developers to buy their way out of providing essential green infrastructure.

This legislation is being sold under a false equity narrative. The legislative digest claims these pooled fees will go to "low-canopy areas." The actual text of the ordinance deposits these fees into the general Adopt-A-Tree Fund with no geographic spending restrictions. Without a statutory requirement to spend these funds in designated Environmental Justice communities, this expansion creates an unregulated slush fund.

Public Works cannot manage its existing in-lieu fees. In February 2023, the department collected $242,000 from UCSF to plant 105 replacement trees. Exactly zero have been planted so far. The department is not even using the funds they have right now. Furthermore, the

department administratively canceled over 900 active 311 requests for tree replacement in empty sidewalk basins in December 2025.

The legislation also eliminates the public right to appeal "hazard" tree removals without defining what constitutes a hazard. This allows the City to label any inconvenient tree as hazardous to fast-track its removal without public oversight.

The City must reject this proposal entirely or substantially amend it. Any amendment must raise the fee to reflect the true cost of planting and maintaining a tree. It must strictly dictate where the funds are spent using clear definitions for "high environmental justice burden" and "low canopy." Finally, it must preserve the public's right to appeal tree removals and mandate transparency for hazard designations.

From:	Charles Rathbone
To:	CPC-Commissions Secretary; Carroll, John (BOS); Melgar, Myrna (BOS); Chen, Chyanne (BOS); Mahmood, Bilal (BOS)
Cc:	ChenStaff; MelgarStaff (BOS); MahmoodStaff; Gluckstein, Lisa (CPC); Lozano, Jesus (ENV); DPW, Urbanforestry (DPW); Short, Carla (DPW); Moore, David (DPW)
Subject:	Amend File 251211: Stop the Unregulated In-Lieu Fee Expansion
Date:	Wednesday, March 11, 2026 10:23:14 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Trees make such a difference! Please do whatever you can to ensure more, more and more trees.

Specifically don't allow fees in-lieu of tree plantings, and do allow appeal of "hazard" removals.

Sincerely,

Charles Rathbone
Mission Bay Resident
c.rathbone@sonic.net

From:	Lana Pfeifer
To:	CPC-Commissions Secretary; Carroll, John (BOS); Melgar, Myrna (BOS); Chen, Chyanne (BOS); Mahmood, Bilal (BOS)
Cc:	ChenStaff; MelgarStaff (BOS); MahmoodStaff; Gluckstein, Lisa (CPC); Lozano, Jesus (ENV); DPW, Urbanforestry (DPW); Short, Carla (DPW); Moore, David (DPW)
Subject:	Amend File 251211: Stop the Unregulated In-Lieu Fee Expansion
Date:	Wednesday, March 11, 2026 9:29:53 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Members of the Land Use Committee, Planning Commission, and Urban Forestry Council,

I am writing to oppose the street tree legislation in Board File 251211.

Allowing developers to pay a $2,590 fee instead of planting a street tree is a gift to the real estate industry. Developers will choose the fee over navigating the City's planting requirements. The City must focus on streamlining the permitting process rather than allowing developers to buy their way out of providing essential green infrastructure.

This legislation is being sold under a false equity narrative. The legislative digest claims these pooled fees will go to "low-canopy areas." The actual text of the ordinance deposits these fees into the general Adopt-A-Tree Fund with no geographic spending restrictions. Without a statutory requirement to spend these funds in designated Environmental Justice communities, this expansion creates an unregulated slush fund.

Public Works cannot manage its existing in-lieu fees. In February 2023, the department collected $242,000 from UCSF to plant 105 replacement trees. Exactly zero have been planted so far. The department is not even using the funds they have right now. Furthermore, the department administratively canceled over 900 active 311 requests for tree replacement in empty sidewalk basins in December 2025.

The legislation also eliminates the public right to appeal "hazard" tree removals without defining what constitutes a hazard. This allows the City to label any inconvenient tree as hazardous to fast-track its removal without public oversight.

The City must reject this proposal entirely or substantially amend it. Any amendment must raise the fee to reflect the true cost of planting and maintaining a tree. It must strictly dictate where the funds are spent using clear definitions for "high environmental justice burden" and "low canopy." Finally, it must preserve the public's right to appeal tree removals and mandate transparency for hazard designations.

Sincerely,
Lana Pfeifer
Duboce Triangle

From: Catherine Terry
To: Carroll, John (BOS)
Subject: SF Trees
Date: Tuesday, March 10, 2026 5:51:21 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Hello!

What's your favorite tree and why? Mine is the ginkgo which I'm endeared to since it's also my mom's favorite. I love when the leaves turn bright yellow in the fall.

I'm writing today to express my firm opposition to the mayor's proposed changes to street tree legislation.

Giving developers an option to pay meager $3k fee instead of requiring a planted and cared for tree when building will only result in fewer trees— *even if* this fee was required to be spent on tree planning by the city (which it currently is not).

This move seems to be a very short sighted attempt to appease developers. It does not support the well being of San Franciscans that live and work here. Trees help keep our city cool and clean and beautiful and giving developers a pass on planting them is not acceptable.

Similarly, I oppose the full removal/restriction of the appeal process for street tree removal, hazardous or otherwise. Trees are part of the neighborhood and constituents deserve the chance to be part of the process— especially since trees may accidentally be marked for hazardous removal (as several were in district 5 a few months ago).

Thank you,
Catherine
Hayes Valley Resident

From:	judith zimrin
To:	CPC-Commissions Secretary; Carroll, John (BOS); Crayton, Monique (BOS); Jalipa, Brent (BOS); Board of Supervisors (BOS)
Subject:	trees and public input
Date:	Tuesday, March 10, 2026 4:10:32 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

As the Land Use Transportation Committee considers the Mayor's full proposed amendments to our street tree legislation: (1) give developers the choice to plant or not; (2) eliminate the public's right to appeal trees that are designated as "hazards"; (3) and allow the public to appeal City-initiated tree removals but only on a compressed time schedule that could, in essence, curtail the public's ability to mount an effective defense of our trees, I would like to speak out against these proposals.

As a resident of North Beach we have been through these battles before. It is important to keep our city as green as possible and always allow time and space for neighbors input. **In short, now is not the time to be passing laws that reduce our tree canopy, its oversight, and the public's right to stand up for the few trees we have.** San Francisco has the smallest urban forest of any major city in the United States. And, since 2017,*we have net lost hundreds of street trees*. Further, we are thousands of trees behind what is called for in our City's own Climate Action Plan - a plan created in response to the 2019 Declaration that we are in a Climate Emergency. **It is astounding that, as our climate rapidly deteriorates, we are playing games with this critical aspect of our City's climate resilience rather than doubling down on protecting and planting more trees.**

Thank you,

Judith Zimrin

From:	Caralinda Lee
To:	CPC-Commissions Secretary; Carroll, John (BOS); Melgar, Myrna (BOS); Chen, Chyanne (BOS); Mahmood, Bilal (BOS)
Cc:	ChenStaff; MelgarStaff (BOS); MahmoodStaff; Gluckstein, Lisa (CPC); Lozano, Jesus (ENV); DPW, Urbanforestry (DPW); Short, Carla (DPW); Moore, David (DPW)
Subject:	Amend File 251211: Stop the Unregulated In-Lieu Fee Expansion
Date:	Tuesday, March 10, 2026 3:45:19 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Members of the Land Use Committee, Planning Commission, and Urban Forestry Council,

I am writing to oppose the street tree legislation in Board File 251211.

Allowing developers to pay a $2,590 fee instead of planting a street tree is a gift to the real estate industry. Developers will choose the fee over navigating the City's planting requirements. The City must focus on streamlining the permitting process rather than allowing developers to buy their way out of providing essential green infrastructure.

This legislation is being sold under a false equity narrative. The legislative digest claims these pooled fees will go to "low-canopy areas." The actual text of the ordinance deposits these fees into the general Adopt-A-Tree Fund with no geographic spending restrictions. Without a statutory requirement to spend these funds in designated Environmental Justice communities, this expansion creates an unregulated slush fund.

Public Works cannot manage its existing in-lieu fees. In February 2023, the department collected $242,000 from UCSF to plant 105 replacement trees. Exactly zero have been planted so far. The department is not even using the funds they have right now. Furthermore, the department administratively canceled over 900 active 311 requests for tree replacement in empty sidewalk basins in December 2025.

The legislation also eliminates the public right to appeal "hazard" tree removals without defining what constitutes a hazard. This allows the City to label any inconvenient tree as hazardous to fast-track its removal without public oversight.

The City must reject this proposal entirely or substantially amend it. Any amendment must raise the fee to reflect the true cost of planting and maintaining a tree. It must strictly dictate where the funds are spent using clear definitions for "high environmental justice burden" and "low canopy." Finally, it must preserve the public's right to appeal tree removals and mandate transparency for hazard designations.

Sincerely,

Caralinda Lee
Cathedral Hill / Western Edition

Sent from my iPhone

From:	Robert Hall
To:	CPC-Commissions Secretary; Board of Supervisors (BOS); Carroll, John (BOS)
Subject:	Public Comment: Planning Code Amendment – Ordinance, sponsored by Mayor Lurie to remove street trees
Date:	Tuesday, March 10, 2026 12:13:59 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Planning Commissioners, Supervisors and Land Use and Transportation Committee Members,

Please reject Mayor Lurie's proposal to allow developers to forego their street tree responsibilities while paying a scant penalty. The public is growing weary of "Billionaires and Developers First" laws that cheapen our neighborhoods, diminish quality of life and air we breath and take away San Franciscans rights to weigh-in on matters. We don't want to be walled in by towers and concrete barriers. This may seem like a small issue but is a glaring blinking light indicating how far the city leaders are going to remake the city for the wealthy few who stand to profit by dismantling neighborhoods.

Now is not the time to pass laws to reduce our street tree canopy. The mayor is already defunding the Environment Department, much like his billionaire co-hort, Donald Trump, is doing on the federal level. We know the mayor is crime obsessed. Here's something that may appeal to him: *Studies have found that neighborhoods with greater tree canopy often experience **lower crime rates.** One analysis linked a 10% increase in canopy to a roughly 12% reduction in crime. Researchers believe greenery signals that a place is cared for and encourages more people to spend time outdoors, increasing informal neighborhood oversight.*

Bob Hall
94117

From:	Roger W
To:	CPC-Commissions Secretary; Carroll, John (BOS); Melgar, Myrna (BOS); Chen, Chyanne (BOS); Mahmood, Bilal (BOS)
Cc:	ChenStaff; MelgarStaff (BOS); MahmoodStaff; Gluckstein, Lisa (CPC); Lozano, Jesus (ENV); DPW, Urbanforestry (DPW); Short, Carla (DPW); Moore, David (DPW)
Subject:	Amend File 251211: Stop the Unregulated In-Lieu Fee Expansion
Date:	Tuesday, March 10, 2026 12:21:38 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Hello and thank you.

I am writing to oppose the street tree legislation in Board File 251211.

Allowing developers to pay a $2,590 fee instead of planting a street tree is a gift to the real estate industry. Developers will choose the fee over navigating the City's planting requirements. The City must focus on streamlining the permitting process rather than allowing developers to buy their way out of providing essential green infrastructure.

This legislation is being sold under a false equity narrative. The legislative digest claims these pooled fees will go to "low-canopy areas." The actual text of the ordinance deposits these fees into the general Adopt-A-Tree Fund with no geographic spending restrictions. Without a statutory requirement to spend these funds in designated Environmental Justice communities, this expansion creates an unregulated slush fund.

Public Works cannot manage its existing in-lieu fees. In February 2023, the department collected $242,000 from UCSF to plant 105 replacement trees. Exactly zero have been planted so far. The department is not even using the funds they have right now. Furthermore, the department administratively canceled over 900 active 311 requests for tree replacement in empty sidewalk basins in December 2025.

The legislation also eliminates the public right to appeal "hazard" tree removals without defining what constitutes a hazard. This allows the City to label any inconvenient tree as hazardous to fast-track its removal without public oversight.

The City must reject this proposal entirely or substantially amend it. Any amendment must raise the fee to reflect the true cost of planting and maintaining a tree. It must strictly dictate where the funds are spent using clear definitions for "high environmental justice burden" and "low canopy." Finally, it must preserve the public's right to appeal tree removals and mandate transparency for hazard designations.

Sincerely,

[Your Name]
[Your Neighborhood]

From:	Diana Scott
To:	CPC-Commissions Secretary; Carroll, John (BOS); Melgar, Myrna (BOS); Chen, Chyanne (BOS); Mahmood, Bilal (BOS)
Cc:	ChenStaff; MelgarStaff (BOS); MahmoodStaff; Gluckstein, Lisa (CPC); Lozano, Jesus (ENV); DPW, Urbanforestry (DPW); Short, Carla (DPW); Moore, David (DPW); WongStaff (BOS); WongStaff (BOS); Wong, Alan (BOS); Wong, Alan (BOS)
Subject:	Amend File 251211: Stop the Unregulated In-Lieu Fee Expansion
Date:	Tuesday, March 10, 2026 2:10:24 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Members of the Land Use Committee, Planning Commission, and Urban Forestry Council,

I am writing to oppose the street tree legislation in Board File 251211. I am a resident of District 4, and deeply disappointed that the measure was proposed by my new supervisor.
I sincerely hope he will reconsider.

Allowing developers to pay a $2,590 fee instead of planting a street tree is a gift to the real estate industry. Developers will choose the fee over navigating the City's planting requirements. The City must focus on streamlining the permitting process rather than allowing developers to buy their way out of providing essential green infrastructure.

This legislation is being sold under a false equity narrative. The legislative digest claims these pooled fees will go to "low-canopy areas." The actual text of the ordinance deposits these fees into the general Adopt-A-Tree Fund with no geographic spending restrictions. Without a statutory requirement to spend these funds in designated Environmental Justice communities, this expansion creates an unregulated slush fund.

Public Works cannot manage its existing in-lieu fees. In February 2023, the department collected $242,000 from UCSF to plant 105 replacement trees. Exactly zero have been planted so far. The department is not even using the funds they have right now. Furthermore, the department administratively canceled over 900 active 311 requests for tree replacement in empty sidewalk basins in December 2025.

The legislation also eliminates the public right to appeal "hazard" tree removals without defining what constitutes a hazard. This allows the City to label any inconvenient tree as hazardous to fast-track its removal without public oversight.

The City must reject this proposal entirely or substantially amend it. Any amendment must raise the fee to reflect the true cost of planting and maintaining a tree. It must strictly dictate where the funds are spent using clear definitions for "high environmental justice burden" and "low canopy." Finally, it must preserve the public's right to appeal tree removals and mandate transparency for hazard designations.

[NOTE: New trees are unsatisfactory replacements for mature trees with developers may target, require city maintenance to survive - and cutting old trees releases stored carbon adding to CO2 pollution. A developers' fee does not compensate for these losses.]

Diana Scott
Outer Sunset (District 4)

From: Jean Barish
To: CPC-Commissions Secretary
Cc: Board of Supervisors (BOS); Carroll, John (BOS)
Subject: SF Planning Commission Meeting, March 12, 2026 – Agenda Item 9 – Board File #251211
Date: Tuesday, March 10, 2026 2:40:04 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Commissioners:

I am a Richmond District resident and President, Planning Association for the Richmond. I am writing on my own behalf regarding Agenda Item 9 on the March 12, 2026, Planning Commission Meeting. This Ordinance will impact San Francisco's tree canopy by allowing developers to pay an *in lieu* fee instead of planting trees in front of new developments. It will also alter the appeals process for tree removal. For the reasons set forth below, I oppose the proposed Ordinance as currently drafted.

Developers Should Not be Gifted with the Opportunity to Opt Out of Planting Trees

There are several reasons why I oppose this section of the Ordinance:

- The *in lieu* fee of $2590 is unrealistically low and gives a developer an incentive to pay it instead of planting trees and maintaining them for a few years. It is likely, therefore, that this option will result in fewer trees being planted in San Francisco.

- Payment of an *in lieu* fee does not assure a new tree will be planted somewhere else in the city, especially since there is no mechanism to ensure that a healthy new tree will be planted elsewhere. The City claims these fees will fund tree planting in "low-canopy areas." The actual text of the legislation contains no such requirement. The money goes into a general fund. We know Public Works fails to manage these funds. In 2023, they collected $242,000 from UCSF to plant 105 replacement trees. Three years later, those trees remain unplanted. This *in lieu* fee loophole is a gift to developers that will likely result in fewer trees in the City.

- Developers often see trees as an inconvenience. This provision will likely incentivize developers to pay the fee in order to avoid planting much needed trees, especially in a City that already has an unusually small tree canopy.

There Should be More Conditions Attached to the Removal of a Hazardous Tree Without Appeal

While it is important that hazardous trees should be removed, the designation of "hazard" needs more oversight and transparency. This section of the ordinance should not be approved unless and until it includes a commitment that the designation process has proper oversight, is transparent, and includes a commitment to expedited replanting when a tree is removed due to being "hazardous".

Compressing Appeal Times for All Other City-Initiated Tree Removals is Unacceptable

Compressing the time for appeals is problematic and should not be approved. There is no evidence that appeals will increase construction costs, which is what the Mayor's office claims. While most City projects are years in the making, the average appeal time is only 75 days.

Further, a compressed time period would make it more difficult for an appellant to mount a meaningful appeal, since seeking public records takes longer than the 30 days allowed in this proposed appeal schedule. Shortening the appeal time, therefore, will unfairly deny appellants their due process rights, and should be rejected.

In conclusion, now is not the time to pass an ordinance that reduces our tree canopy, the oversight of tree removal and planting, and the public's right to stand up for the few trees we have. San Francisco needs sound ordinances and policies that will enhance our tree canopy, not diminish it. For the sake of our City and for the sake of our environment, please do not pass this Ordinance as currently written.

Thank you for your consideration.

Sincerely,



Jean B Barish

Jean B Barish, Esq., MS, MA
jeanbbarish@hotmail.com

From:	Ramona Draeger
To:	CPC-Commissions Secretary; Carroll, John (BOS); Melgar, Myrna (BOS); Chen, Chyanne (BOS); Mahmood, Bilal (BOS)
Cc:	ChenStaff; MelgarStaff (BOS); MahmoodStaff; Gluckstein, Lisa (CPC); Lozano, Jesus (ENV); DPW, Urbanforestry (DPW); Short, Carla (DPW); Moore, David (DPW)
Subject:	Amend File 251211: Stop the Unregulated In-Lieu Fee Expansion
Date:	Tuesday, March 10, 2026 10:52:44 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Members of the Land Use Committee, Planning Commission, and Urban Forestry Council,

I am writing to oppose the street tree legislation in Board File 251211.

Allowing developers to pay a $2,590 fee instead of planting a street tree is a gift to the real estate industry. Developers will choose the fee over navigating the City's planting requirements. The City must focus on streamlining the permitting process rather than allowing developers to buy their way out of providing essential green infrastructure.

This legislation is being sold under a false equity narrative. The legislative digest claims these pooled fees will go to "low-canopy areas." The actual text of the ordinance deposits these fees into the general Adopt-A-Tree Fund with no geographic spending restrictions. Without a statutory requirement to spend these funds in designated Environmental Justice communities, this expansion creates an unregulated slush fund.

Public Works cannot manage its existing in-lieu fees. In February 2023, the department collected $242,000 from UCSF to plant 105 replacement trees. Exactly zero have been planted so far. The department is not even using the funds they have right now. Furthermore, the department administratively canceled over 900 active 311 requests for tree replacement in empty sidewalk basins in December 2025.

The legislation also eliminates the public right to appeal "hazard" tree removals without defining what constitutes a hazard. This allows the City to label any inconvenient tree as hazardous to fast-track its removal without public oversight.

The City must reject this proposal entirely or substantially amend it. Any amendment must raise the fee to reflect the true cost of planting and maintaining a tree. It must strictly dictate where the funds are spent using clear definitions for "high environmental justice burden" and "low canopy." Finally, it must preserve the public's right to appeal tree removals and mandate transparency for hazard designations.

Sincerely,

Ramona Draeger
Neighborhood: The Pan Handle

From:	Michael Moore
To:	CPC-Commissions Secretary; Carroll, John (BOS); Melgar, Myrna (BOS); Chen, Chyanne (BOS); Mahmood, Bilal (BOS)
Cc:	ChenStaff; MelgarStaff (BOS); MahmoodStaff; Gluckstein, Lisa (CPC); Lozano, Jesus (ENV); DPW, Urbanforestry (DPW); Short, Carla (DPW); Moore, David (DPW)
Subject:	Amend File 251211: Stop the Unregulated In-Lieu Fee Expansion
Date:	Tuesday, March 10, 2026 10:50:45 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Members of the Land Use Committee, Planning Commission, and Urban Forestry Council, I am writing to oppose the street tree legislation in Board File 251211. Allowing developers to pay a $2,590 fee instead of planting a street tree is a gift to the real estate industry. Developers will choose the fee over navigating the City's planting requirements. The City must focus on streamlining the permitting process rather than allowing developers to buy their way out of providing essential green infrastructure. This legislation is being sold under a false equity narrative. The legislative digest claims these pooled fees will go to "low-canopy areas." The actual text of the ordinance deposits these fees into the general Adopt-A-Tree Fund with no geographic spending restrictions. Without a statutory requirement to spend these funds in designated Environmental Justice communities, this expansion creates an unregulated slush fund. Public Works cannot manage its existing in-lieu fees. In February 2023, the department collected $242,000 from UCSF to plant 105 replacement trees. Exactly zero have been planted so far. The department is not even using the funds they have right now. Furthermore, the department administratively canceled over 900 active 311 requests for tree replacement in empty sidewalk basins in December 2025. The legislation also eliminates the public right to appeal "hazard" tree removals without defining what constitutes a hazard. This allows the City to label any inconvenient tree as hazardous to fast-track its removal without public oversight. The City must reject this proposal entirely or substantially amend it. Any amendment must raise the fee to reflect the true cost of planting and maintaining a tree. It must strictly dictate where the funds are spent using clear definitions for "high environmental justice burden" and "low canopy." Finally, it must preserve the public's right to appeal tree removals and mandate transparency for hazard designations. Sincerely, Michael Moore Mission Dist.

From:	Mary Ross
To:	CPC-Commissions Secretary; Carroll, John (BOS); Melgar, Myrna (BOS); Chen, Chyanne (BOS); Mahmood, Bilal (BOS)
Cc:	ChenStaff; MelgarStaff (BOS); MahmoodStaff; Gluckstein, Lisa (CPC); Lozano, Jesus (ENV); DPW, Urbanforestry (DPW); Short, Carla (DPW); Moore, David (DPW)
Subject:	Amend File 251211: Stop the Unregulated In-Lieu Fee Expansion
Date:	Tuesday, March 10, 2026 11:22:52 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Members of the Land Use Committee, Planning Commission, and Urban Forestry Council,

I am writing to oppose the street tree legislation in Board File 251211.

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Sincerely,

Mary Ross
Inner Sunset

From:	Karolina Östegård Branley
To:	CPC-Commissions Secretary; Carroll, John (BOS); Melgar, Myrna (BOS); Chen, Chyanne (BOS); Mahmood, Bilal (BOS)
Cc:	ChenStaff; MelgarStaff (BOS); MahmoodStaff; Gluckstein, Lisa (CPC); Lozano, Jesus (ENV); DPW, Urbanforestry (DPW); Short, Carla (DPW); Moore, David (DPW)
Subject:	Amend File 251211: Stop the Unregulated In-Lieu Fee Expansion
Date:	Tuesday, March 10, 2026 9:11:34 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Members of the Land Use Committee, Planning Commission, and Urban Forestry Council,

I am writing to oppose the street tree legislation in Board File 251211.

Allowing developers to pay a $2,590 fee instead of planting a street tree is a gift to the real estate industry. Developers will choose the fee over navigating the City's planting requirements. The City must focus on streamlining the permitting process rather than allowing developers to buy their way out of providing essential green infrastructure.

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Sincerely,

Karolina Branley
Outer Sunset

From: northofmarketplanningcoalition@yahoo.com
To: CPC-Commissions Secretary
Subject: Opposition to Proposed Legislation (File No. 251211) – Elimination of Appeals for Street Tree Removals by City Departments and Commissions
Date: Tuesday, March 10, 2026 3:22:19 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Members of the Land Use Committee, Planning Commission, and Urban Forestry Council,

The former board members of the North of Market Planning Coalition are writing to express our firm opposition to the proposed ordinance in Board File 251211. This legislation, introduced by Mayor Daniel Lurie and Supervisor Alan Wong, would amend the Public Works Code to allow development projects to satisfy mandatory street tree planting requirements through payment of an in-lieu fee (currently set at $2,590 per tree) or by providing alternative landscaping; exempt accessory dwelling units (ADUs) from these requirements; eliminate the public's right to appeal tree removals initiated by City departments and commissions; and update in-lieu fee reporting requirements. It would further amend the Administrative Code to create a separate account within the Adopt-A-Tree Fund specifically for these in-lieu fees, and amend the Planning Code to align street tree applicability with these changes.

San Francisco already has one of the lowest urban tree canopy coverages among major U.S. cities—approximately 13-14%—far below the national average and well short of what is needed for climate resilience, heat mitigation, air quality improvement, stormwater management, and overall quality of life. This sparse canopy is unevenly distributed, with low-canopy areas disproportionately affecting Environmental Justice communities in neighborhoods like South of Market, the Tenderloin, Bayview, and the Mission, where canopy coverage can dip as low as 4-7%. These areas face heightened risks from urban heat islands, poor air quality, and related health disparities.

As former leaders of a coalition long dedicated to thoughtful planning and community well-being in the North of Market area and beyond, we strongly oppose any weakening of existing street tree protections. Allowing developers and property owners to opt out of on-site planting via a relatively low in-lieu fee or vague "alternative landscaping" will predictably result in fewer trees being planted in the public right-of-way near new developments—precisely where they provide the most direct benefits to residents, pedestrians, and the immediate neighborhood. Developers will opt for the fee to avoid site-specific challenges, long-term maintenance responsibilities, and permitting hurdles, turning what should be a mandatory contribution to the urban forest into an optional, underfunded substitute.

Exempting ADUs from requirements further erodes potential canopy gains in residential areas, while eliminating public appeals for City-initiated tree removals

removes critical oversight and accountability. Without clear definitions of "hazard" trees and preserved appeal rights, this risks enabling unchecked removals that prioritize expediency over preservation.

Rather than diluting protections, the City should pursue policies that actively increase the urban tree canopy citywide to address equity gaps and build climate resilience. We urge rejection of Board File 251211 in its entirety and instead support the following stronger measures:

- **Mandate and incentivize on-site planting** wherever feasible, with significantly higher in-lieu fees (well above $2,590, reflecting true costs of planting, establishment, irrigation, and 10+ years of maintenance for a mature tree) to discourage opt-outs and generate substantial revenue for proactive planting.
- **Prioritize fee expenditures** strictly in low-canopy, high Environmental Justice burden neighborhoods through statutory requirements, clear definitions (e.g., based on census tract data for canopy coverage below 10% and heat/pollution vulnerability), and annual transparent reporting on fund allocation and tree planting outcomes.
- **Streamline legitimate tree planting processes** by improving inter-departmental coordination, reducing bureaucratic delays for permits, providing technical assistance and pre-approved species/site guidance, and expanding partnerships with nonprofits like Friends of the Urban Forest to accelerate community-driven plantings.
- **Expand proactive citywide initiatives**, such as ambitious targets to fill vacant sidewalk tree basins (thousands exist citywide), launch targeted planting programs in underserved areas funded by general fund allocations or grants, and integrate tree canopy goals into all major planning documents and development approvals.
- **Strengthen public oversight**, including preserving and enhancing appeal rights for all tree removals, requiring robust notice and justification for hazard designations, and reinvigorating advisory roles for bodies like the Urban Forestry Council to guide equitable canopy expansion.

San Francisco's residents deserve a greener, healthier, more equitable city. Weakening tree requirements under the guise of permitting reform will only set back progress toward a more livable urban environment. We call on you to reject this proposal and champion measures that truly grow our tree canopy for all San Franciscans.
Sincerely,

Former Board Members,
North of Market Planning Coalition

From:	Paula Katz
To:	CPC-Commissions Secretary; Carroll, John (BOS); Melgar, Myrna (BOS); Chen, Chyanne (BOS); Mahmood, Bilal (BOS)
Cc:	Wong, Alan (BOS); WongStaff (BOS); ChenStaff; MahmoodStaff; Gluckstein, Lisa (CPC); Lozano, Jesus (ENV); DPW, Urbanforestry (DPW); Short, Carla (DPW); Moore, David (DPW); MelgarStaff (BOS)
Subject:	Please Vote No on Item F9: 2025-012149PCA and BOS File 251211 - Stop the Unregulated In-Lieu Fee Expansion on Street Trees & Keep the Right to Appeal Designation of Trees as Hazardous
Date:	Monday, March 9, 2026 8:25:16 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Members of the Planning Commission, the Board of Supervisors Land Use Committee, and Urban Forestry Council,

My name is Paula Katz, and I am have been a resident and voter in District 4 in San Francisco for over 33 years. Although this item was sponsored by our new D4 supervisor Alan Wong, I strong urge you to vote against it. We need more, not fewer, trees in San Francisco, and this plan will result in fewer trees. I realize that the Mayor wants these proposals to supposedly streamline development under his family zoning plan, but his reasoning is faulty, and the cost to San Franciscan residents and the environment is too high.

1. Please Reject the Proposal as it Would Allow Builders and Developers the Option Not to Plant Trees, Which Will Result in Fewer Trees

This proposal does not streamline development - developers have repeatedly shown that they see trees as an inconvenience. At 300 DeHaro, for example, a developer illegally removed 7 healthy trees not too long ago - 4 of which were planted by Friends of the Urban Forest decades ago, 3 of which were planted with tax dollars for the 16th Street improvement project. To those developers, the trees were simply an inconvenience. So if given the choice between planting and watering a tree, or throwing virtual pennies at the City, *what do you think developers will choose*? Not to plant trees, of course.

And nowhere does this proposal require the city to use the $2590 in-lieu fee to plant a new tree elsewhere in San Francisco. In fact, San Francisco doesn't have a mechanism for ensuring that the in-lieu fee will result in a healthy and established new tree. This in-lieu fee option is an unwarranted gift to developers that will result in fewer trees in San Francisco. That's wrong. We need more trees to improve our health and the quality of our lives:

- Trees help fight climate change by absorbing carbon dioxide from the air and storing it in their wood;
- Trees boost our mental and physical health, and now there is scientific evidence to prove what had just been anecdotal claims. In Louisville, KY, researchers recently found that planting 9,000 trees improved neighbors' health conditions that are linked to heart disease, stroke and some types of cancer.
- Trees remove particulate matter, which is the kind of air pollution that is most dangerous to our lungs, enabling us to breathe more easily in the cleaner air.
- Trees and forests provide housing for millions of species that protect us from disease.

2. Please Reject the Proposal as it Removes the Right to Appeal Hazardous Trees

I believe that most people agree that hazardous trees should be removed for public safety. Duh, it's a no brainer. But we don't like how the "hazard" designation could be abused without strong oversight and transparency, including the right to appeal to the Board of Appeals. In District 5, for example, a DPW Tree Inspector recently listed 5 large trees - on a single block - for immediate removal. Only when hundreds of neighbors sent panicked letters to DPW did DPW acknowledge that its inspector made a mistake. So what happens when an inspector designates a tree as a "hazard", perhaps mistakenly, but hundreds of people do *not* send letters? Or, worse, what happens if a tree is designated as a "hazard" just to avoid an appeal? We need a commitment to full transparency and consistency around the "hazard" tree designation, the right to appeal that designation, and a robust commitment to expedited replanting when trees are taken out due to being "hazardous."

3. Please Reject the Proposal as it Compresses Appeal Times for All Other City-Initiated Tree Removals

Finally, the Mayor's office has backed down on the absurd proposal to remove the public's right to appeal all City-initiated tree removals. Instead, they want to require these appeals to be exclusively subject to a more compressed timeframe. The rationale is that appeals can increase construction costs.

First, the Mayor's office didn't offer a single example of how tree appeals increase construction costs. Take the Van Ness BRT, for example, where the City proposed to remove all 200 trees along Van Ness to add the bus lane. I protested the removal of

those old growth trees, including at the Board of Appeals. That public appeal saved 100 of those trees. The Van Ness BRT, on the other hand, notoriously took two decades of planning and 6 years of construction. Can anyone in the City explain - with receipts, not just assertion - how a shorter appeal period would've made a difference in that decades-long project. Most City projects are years in the making. In contrast, the average appeal time is 75 days from start to finish. That clearly does not unnecessarily delay any project.

Second, a compressed time period means that any appellant seeking public records to mount a meaningful appeal could not do so, because public records would not be produced in time for compressed briefing schedules. As I understand it, although the City wants to compress the appeal period, DPW has refused to expedite responses to records requests for appellants.

In summary, now is not the time to be passing laws that reduce our tree canopy, the City's oversight, and the public's right to stand up for the few trees we have. San Francisco has the smallest urban forest of any major city in the United States. And, since 2017, *we have net lost hundreds of street trees*. Further, we are thousands of trees behind what is called for in our City's own Climate Action Plan - a plan created in response to the 2019 Declaration that we are in a Climate Emergency. **It is astounding that, as our climate rapidly deteriorates, we are playing games with this critical aspect of our City's climate resilience, rather than doubling down on protecting and planting more trees.**

Please vote no on this proposal, or amend it to correct the above deficiencies.

Thank you.

Paula Katz

From:	Shoshannah Flach
To:	CPC-Commissions Secretary; Carroll, John (BOS); Melgar, Myrna (BOS); Chen, Chyanne (BOS); Mahmood, Bilal (BOS)
Cc:	ChenStaff; MelgarStaff (BOS); MahmoodStaff; Gluckstein, Lisa (CPC); Lozano, Jesus (ENV); DPW, Urbanforestry (DPW); Short, Carla (DPW); Moore, David (DPW)
Subject:	Amend File 251211: Green not Greed Stop the Unregulated In-Lieu Fee Expansion
Date:	Monday, March 9, 2026 1:36:30 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Members of the Land Use Committee, Planning Commission, and Urban Forestry Council,

As a life long SF resident and registered voter, writing to declare opposition to the street tree legislation in Board File 251211. Allowing developers to pay a $2,590 fee instead of planting a street tree is a gift to the real estate industry. Developers will choose the fee over navigating the City's planting requirements. The City must focus on streamlining the permitting process rather than allowing developers to buy their way out of providing essential green infrastructure.

There are loopholes in the legislation. The legislative digest claims these pooled fees will go to "low-canopy areas." The actual text of the ordinance deposits these fees into the general Adopt-A-Tree Fund with no geographic spending restrictions. Without a statutory requirement to spend these funds in designated Environmental Justice communities, this expansion creates an unregulated slush fund. Public Works cannot manage its existing in-lieu fees.

There is potential misuse of the “hazard” tree designation. The legislation also eliminates the public right to appeal "hazard" tree removals without defining what constitutes a hazard. This allows the City to label any inconvenient tree as hazardous to fast-track its removal without public oversight. The City must reject this proposal entirely or substantially amend it. Any amendment must raise the fee to reflect the true cost of planting and maintaining a tree.

It is critically important that the funds are spent using clear definitions for "high environmental justice burden" and "low canopy." And legislation must preserve the public's right to appeal tree removals and mandate transparency for hazard designations.

Sincerely,
Shoshannah Flach
Western Addition voter 94115

From:	Lance Carnes
To:	CPC-Commissions Secretary; Carroll, John (BOS); Melgar, Myrna (BOS); Chen, Chyanne (BOS); Mahmood, Bilal (BOS)
Cc:	ChenStaff; MelgarStaff (BOS); MahmoodStaff; Gluckstein, Lisa (CPC); Lozano, Jesus (ENV); DPW, Urbanforestry (DPW); Short, Carla (DPW); Moore, David (DPW)
Subject:	Amend File 251211: Stop the Unregulated In-Lieu Fee Expansion
Date:	Monday, March 9, 2026 2:11:24 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Members of the Land Use Committee, Planning Commission, and Urban Forestry Council,

I am writing to oppose the street tree legislation in Board File 251211.

Allowing developers to pay a $2,590 fee instead of planting a street tree is a gift to the real estate industry. Developers will choose the fee over navigating the City's planting requirements. The City must focus on streamlining the permitting process rather than allowing developers to buy their way out of providing essential green infrastructure.

This legislation is being sold under a false equity narrative. The legislative digest claims these pooled fees will go to "low-canopy areas." The actual text of the ordinance deposits these fees into the general Adopt-A-Tree Fund with no geographic spending restrictions. Without a statutory requirement to spend these funds in designated Environmental Justice communities, this expansion creates an unregulated slush fund.

Public Works cannot manage its existing in-lieu fees. In February 2023, the department collected $242,000 from UCSF to plant 105 replacement trees. Exactly zero have been planted so far. The department is not even using the funds they have right now. Furthermore, the department administratively canceled over 900 active 311 requests for tree replacement in empty sidewalk basins in December 2025.

The legislation also eliminates the public right to appeal "hazard" tree removals without defining what constitutes a hazard. This allows the City to label any inconvenient tree as hazardous to fast-track its removal without public oversight.

The City must reject this proposal entirely or substantially amend it. Any amendment must raise the fee to reflect the true cost of planting and maintaining a tree. It must strictly dictate where the funds are spent using clear definitions for "high environmental justice burden" and "low canopy." Finally, it must preserve the public's right to appeal tree removals and mandate transparency for hazard designations.

Sincerely,

Lance Carnes
Telegraph Hill

From: L Johns
To: CPC-Commissions Secretary; Carroll, John (BOS)
Subject: trees
Date: Monday, March 9, 2026 2:03:58 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

To the powers who can save trees:

Please circulate this to Supes on the Land Use Committee, thank you.

Hello, Magnificent multi-story palm tree on Columbus Ave couple of blocks from the Wharf simply disappeared a few weeks ago. Landmark that new property owner deemed in the way.

Now is not the time to be passing laws that reduce our tree canopy, its oversight, and the public's right to stand up for the few trees we have. San Francisco has the smallest urban forest of any major city in the United States.

Trees are a nuisance to developers. Pl do not give them option of paying to avoid protecting or planting. Pl do not allow destruction of tree canopy to become source of revenue for our cash-strapped city. And do not allow compression of appeal time unless required documentation from the city can keep up with proposed deadline(s). Finally, please ensure that designation of "hazard" is expert, objective, based on best practice criteria.

Two trees just disappeared from Marini Plaza. One lost a big branch, presumably rationale for complete destruction for public safety. The other...no notice, no idea of the reason, just happens.

Thank you for taking residents' opinions into account when dealing with forces for change. Some change is always warranted. Some proposed are destructive to promotion of health and care for our environment. Show that your leadership knows the difference. Lucy Johns SF CA

From: Barklee Sanders
To: CPC-Commissions Secretary; Carroll, John (BOS); Melgar, Myrna (BOS); Chen, Chyanne (BOS); Mahmood, Bilal (BOS)
Cc: ChenStaff; MelgarStaff (BOS); MahmoodStaff; Gluckstein, Lisa (CPC); Lozano, Jesus (ENV); DPW, Urbanforestry (DPW); Short, Carla (DPW); Moore, David (DPW)
Subject: Amend File 251211: Stop the Unregulated In-Lieu Fee Expansion
Date: Saturday, March 7, 2026 1:45:46 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Members of the Land Use Committee, Planning Commission, and Urban Forestry Council,

I write to urge you to **oppose Board File 251211** ("Street Trees" / PermitSF). (sfgov.legistar.com)

1) A pay-to-skip option will predictably reduce on-site canopy.

This ordinance would let development projects satisfy the street-tree requirement by paying an **in-lieu fee (currently about $2,590 per tree)** rather than planting a tree at the project frontage. (SF Media API) In practice, many applicants will choose the predictable check over the uncertain timeline and coordination involved in on-site planting—especially because the City already controls the permit standards and approvals. (American Legal Publishing)

If San Francisco's goal is speed, the right solution is to **streamline planting approvals and inspections**, not to institutionalize an off-ramp that trades away the most reliable pathway to new street trees: development-triggered, location-specific planting.

2) The ordinance's equity pitch is not enforceable as written.

Supporters invoke "low-canopy" targeting, but **the ordinance does not impose a clear, binding geographic requirement** that the money be spent in low-canopy or high-burden Environmental Justice areas. The fee revenue is deposited into the City's Adopt-A-Tree Fund structure, and while the proposal creates a "separate account" within that fund, it still does **not** require spending in defined low-canopy/EJ communities. (American Legal Publishing)

If you want equity outcomes, the ordinance must do what equity requires: **define terms and mandate where dollars go** (with maps/criteria, not slogans).

3) New fee authority without verified delivery capacity is a recipe for backlog.

San Francisco already has legal obligations around tree replacement timing and public accountability. When the City removes a street tree, a replacement timeline is triggered, yet residents have documented multi-year delays. (San Francisco Chronicle)

We also have real-world examples where large in-lieu payments were collected with promised plantings to follow—like the UCSF matter that included an additional **$242,000 in-lieu payment tied to 105 City-planted trees**. (SF Media API) Before expanding this program, the City should be required to publish a **project-by-project ledger** showing: fee collected, tree locations, planting dates, survival/replacement rates, and remaining balances.

4) Eliminating appeals for "hazard" removals weakens oversight—and "hazard" is broad.

Today, the Public Works Code defines “hazard tree” broadly (including trees deemed “likely to fall,” trees that “interfere” with traffic, or those posing “any other significant hazard” as determined by the Director). (American Legal Publishing) The Code also recognizes “hazard street trees” as a subset of that definition for the public right-of-way. (American Legal Publishing)

The public currently has an appeal pathway for removals under Article 16 procedures. (San Francisco Public Works) Board File 251211 would eliminate key appeal rights for removals by City departments and commissions, including in “hazard” contexts. (sfgov.legistar.com) Removing oversight while retaining a sweeping “hazard” standard invites abuse—intentional or not—and undermines public trust.

What you should do

Please **reject Board File 251211** or amend it so that:

1. **In-lieu payment is limited** to truly infeasible sites (impossible/impracticable/unsafe), rather than a default option. (SF Media API)

2. The fee reflects the **full cost** of planting, establishment, and long-term maintenance—not a bargain-rate substitute.

3. Spending is **statutorily targeted** to defined low-canopy / high-burden communities, with published criteria and maps, and enforceable timelines. (SF Media API)

4. The ordinance **preserves appeal rights** and requires written, publicly posted findings and evidence for any “hazard” designation. (American Legal Publishing)

5. The City must comply with California’s **Mitigation Fee Act** requirements for nexus, segregation/accounting, public reporting, and lawful use of fee revenue. (LegiInfo)

San Franciscans deserve faster permitting *and* a stronger urban forest. This bill, as written, risks delivering neither.

Sincerely,
Barklee Sanders

Key legal references (direct links)

Board File 251211 (Legistar): https://sfgov.legistar.com/LegislationDetail.aspx?GUID=501704C5-BB9D-4EE2-AA5F-78763BC816CC&ID=7781521
Board File packet / legislative digest PDF:
https://media.api.sf.gov/documents/Item_8_Special_Item_File_No._251211_0gONO7P.pdf

SF Public Works Code §806 (street tree permits / appeals framework):
https://codelibrary.amlegal.com/codes/san_francisco/latest/sf_publicworks/0-0-0-4154
SF Public Works Code §802 (definitions incl. “hazard tree”):
https://codelibrary.amlegal.com/codes/san_francisco/latest/sf_publicworks/0-0-0-4083
SF Admin Code §10.100-227 (Adopt-A-Tree Fund):
https://codelibrary.amlegal.com/codes/san_francisco/latest/sf_admin/0-0-0-4828
DPW “Tree Removal Notifications” (appeal instructions):
https://sfpublicworks.org/services/tree-removal-notifications

CA Gov Code §66001 (Mitigation Fee Act findings / 5-year findings & refunds):
https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=GOV&sectionNum=66001

CA Gov Code §66006 (fee accounting / annual public reporting): https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=GOV&sectionNum=66006
CA Gov Code §66008 (fees must be spent only for stated purposes): https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=GOV&sectionNum=66008

SF Sunshine Ordinance (Admin Code Ch. 67): https://codelibrary.amlegal.com/codes/san_francisco/latest/sf_admin/0-0-0-19477
SF Ethics "Open Government Laws" overview: https://sfethics.org/laws/open-government

From:	Leslie
To:	CPC-Commissions Secretary; Carroll, John (BOS); Melgar, Myrna (BOS); Chen, Chyanne (BOS); Mahmood, Bilal (BOS)
Cc:	ChenStaff; MelgarStaff (BOS); MahmoodStaff; Gluckstein, Lisa (CPC); Lozano, Jesus (ENV); DPW, Urbanforestry (DPW); Short, Carla (DPW); Moore, David (DPW)
Subject:	Amend File 251211: Stop the Unregulated In-Lieu Fee Expansion
Date:	Saturday, March 7, 2026 1:45:08 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Members of the Land Use Committee, Planning Commission, and Urban Forestry Council,

I am writing to oppose the street tree legislation in Board File 251211.

Allowing developers to pay a $2,590 fee instead of planting a street tree is a gift to the real estate industry. Developers will choose the fee over navigating the City's planting requirements. The City must focus on streamlining the permitting process rather than allowing developers to buy their way out of providing essential green infrastructure.

This legislation is being sold under a false equity narrative. The legislative digest claims these pooled fees will go to "low-canopy areas." The actual text of the ordinance deposits these fees into the general Adopt-A-Tree Fund with no geographic spending restrictions. Without a statutory requirement to spend these funds in designated Environmental Justice communities, this expansion creates an unregulated slush fund.

Public Works cannot manage its existing in-lieu fees. In February 2023, the department collected $242,000 from UCSF to plant 105 replacement trees. Exactly zero have been planted so far. The department is not even using the funds they have right now. Furthermore, the department administratively canceled over 900 active 311 requests for tree replacement in empty sidewalk basins in December 2025.

The legislation also eliminates the public right to appeal "hazard" tree removals without defining what constitutes a hazard. This allows the City to label any inconvenient tree as hazardous to fast-track its removal without public oversight.

The City must reject this proposal entirely or substantially amend it. Any amendment must raise the fee to reflect the true cost of planting and maintaining a tree. It must strictly dictate where the funds are spent using clear definitions for "high environmental justice burden" and "low canopy." Finally, it must preserve the public's right to appeal tree removals and mandate transparency for hazard designations.

Sincerely,

Leslie Koelsch
District 8

From:	Stephanie Yessler
To:	CPC-Commissions Secretary; Carroll, John (BOS); Melgar, Myrna (BOS); Chen, Chyanne (BOS); Mahmood, Bilal (BOS)
Cc:	ChenStaff; MelgarStaff (BOS); MahmoodStaff; Gluckstein, Lisa (CPC); Lozano, Jesus (ENV); DPW, Urbanforestry (DPW); Short, Carla (DPW); Moore, David (DPW)
Subject:	Amend File 251211: Stop the Unregulated In-Lieu Fee Expansion
Date:	Saturday, March 7, 2026 1:40:21 PM

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Dear Members of the Land Use Committee, Planning Commission, and Urban Forestry Council,

I am writing to oppose the street tree legislation in Board File 251211.

Allowing developers to pay a $2,590 fee instead of planting a street tree is a gift to the real estate industry. Developers will choose the fee over navigating the City's planting requirements. The City must focus on streamlining the permitting process rather than allowing developers to buy their way out of providing essential green infrastructure.

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Public Works cannot manage its existing in-lieu fees. In February 2023, the department collected $242,000 from UCSF to plant 105 replacement trees. Exactly zero have been planted so far. The department is not even using the funds they have right now. Furthermore, the department administratively canceled over 900 active 311 requests for tree replacement in empty sidewalk basins in December 2025.

The legislation also eliminates the public right to appeal "hazard" tree removals without defining what constitutes a hazard. This allows the City to label any inconvenient tree as hazardous to fast-track its removal without public oversight.

The City must reject this proposal entirely or substantially amend it. Any amendment must raise the fee to reflect the true cost of planting and maintaining a tree. It must strictly dictate where the funds are spent using clear definitions for "high environmental justice burden" and "low canopy." Finally, it must preserve the public's right to appeal tree removals and mandate transparency for hazard designations.

Sincerely,

Stephanie Yessler
Western Addition

From:	Tom Zellner
To:	CPC-Commissions Secretary; Carroll, John (BOS); Melgar, Myrna (BOS); Chen, Chyanne (BOS); Mahmood, Bilal (BOS)
Cc:	ChenStaff; MelgarStaff (BOS); MahmoodStaff; Gluckstein, Lisa (CPC); Lozano, Jesus (ENV); DPW, Urbanforestry (DPW); Short, Carla (DPW); Moore, David (DPW)
Subject:	Amend File 251211: Stop the Unregulated In-Lieu Fee Expansion
Date:	Saturday, March 7, 2026 1:40:08 PM

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Dear Members of the Land Use Committee, Planning Commission, and Urban Forestry Council, I am writing to oppose the street tree legislation in Board File 251211. Allowing developers to pay a $2,590 fee instead of planting a street tree is a gift to the real estate industry. Developers will choose the fee over navigating the City's planting requirements. The City must focus on streamlining the permitting process rather than allowing developers to buy their way out of providing essential green infrastructure. This legislation is being sold under a false equity narrative. The legislative digest claims these pooled fees will go to "low-canopy areas." The actual text of the ordinance deposits these fees into the general Adopt-A-Tree Fund with no geographic spending restrictions. Without a statutory requirement to spend these funds in designated Environmental Justice communities, this expansion creates an unregulated slush fund. Public Works cannot manage its existing in-lieu fees. In February 2023, the department collected $242,000 from UCSF to plant 105 replacement trees. Exactly zero have been planted so far. The department is not even using the funds they have right now. Furthermore, the department administratively canceled over 900 active 311 requests for tree replacement in empty sidewalk basins in December 2025. The legislation also eliminates the public right to appeal "hazard" tree removals without defining what constitutes a hazard. This allows the City to label any inconvenient tree as hazardous to fast-track its removal without public oversight. The City must reject this proposal entirely or substantially amend it. Any amendment must raise the fee to reflect the true cost of planting and maintaining a tree. It must strictly dictate where the funds are spent using clear definitions for "high environmental justice burden" and "low canopy." Finally, it must preserve the public's right to appeal tree removals and mandate transparency for hazard designations. Sincerely, [Your Name] [Your Neighborhood]

-Tom

From:	David Goehring
To:	CPC-Commissions Secretary; Carroll, John (BOS); Melgar, Myrna (BOS); Chen, Chyanne (BOS); Mahmood, Bilal (BOS)
Cc:	ChenStaff; MelgarStaff (BOS); MahmoodStaff; Gluckstein, Lisa (CPC); Lozano, Jesus (ENV); DPW, Urbanforestry (DPW); Short, Carla (DPW); Moore, David (DPW)
Subject:	Amend File 251211 ++ Ensure Accountability for Street Tree Fees
Date:	Saturday, March 7, 2026 1:19:06 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear members,

I oppose the proposed street tree policy in Board File 251211.

The bill lets developers pay a $2,590 fee instead of planting a tree. Many will choose to pay rather than deal with the City's planting process. Instead of offering a shortcut, the City should make the permitting system easier to use.

The proposal also claims the fees will support neighborhoods with fewer trees. But the ordinance sends the money to the general Adopt-A-Tree Fund without requiring it to be spent in those areas. Without clear rules, there is no guarantee the funds will help the communities most in need.

Public Works is also struggling to manage the fees it already collects. In 2023, UCSF paid $242,000 for 105 replacement trees, yet none have been planted. At the same time, hundreds of public requests for tree replacements were recently closed without action. The bill would also remove the public's ability to appeal the removal of "hazard" trees, without clearly defining what a hazard is. That weakens oversight of tree removals.

The City should reject this proposal or revise it significantly. The fee should reflect the real cost of planting and caring for trees, the law should clearly state where the money must be spent, and the public should keep the right to appeal tree removals.

Sincerely yours, David

From:	Boyan Bonev
To:	CPC-Commissions Secretary; Carroll, John (BOS); Melgar, Myrna (BOS); Chen, Chyanne (BOS); Mahmood, Bilal (BOS)
Cc:	ChenStaff; MelgarStaff (BOS); MahmoodStaff; Gluckstein, Lisa (CPC); Lozano, Jesus (ENV); DPW, Urbanforestry (DPW); Short, Carla (DPW); Moore, David (DPW)
Subject:	Amend File 251211: Stop the Unregulated In-Lieu Fee Expansion
Date:	Saturday, March 7, 2026 1:18:43 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

P.S: San Francisco's trees (both on sidewalks and in natural spaces) were the main reason my family and I moved to San Francisco and purchased a home here.

Thank you,
Boyan

From:	Elizabeth Hook
To:	CPC-Commissions Secretary; Carroll, John (BOS); Melgar, Myrna (BOS); Chen, Chyanne (BOS); Mahmood, Bilal (BOS)
Cc:	ChenStaff; MelgarStaff (BOS); MahmoodStaff; Gluckstein, Lisa (CPC); Lozano, Jesus (ENV); DPW, Urbanforestry (DPW); Short, Carla (DPW); Moore, David (DPW)
Subject:	Amend File 251211: Stop the Unregulated In-Lieu Fee Expansion
Date:	Saturday, March 7, 2026 1:18:21 PM

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Dear Members of the Land Use Committee, Planning Commission, and Urban Forestry Council,

I am writing to oppose the street tree legislation in Board File 251211.

Allowing developers to pay a $2,590 fee instead of planting a street tree is a gift to the real estate industry. Developers will choose the fee over navigating the City's planting requirements. The City must focus on streamlining the permitting process rather than allowing developers to buy their way out of providing essential green infrastructure.

This legislation is being sold under a false equity narrative. The legislative digest claims these pooled fees will go to "low-canopy areas." The actual text of the ordinance deposits these fees into the general Adopt-A-Tree Fund with no geographic spending restrictions. Without a statutory requirement to spend these funds in designated Environmental Justice communities, this expansion creates an unregulated slush fund.

Public Works cannot manage its existing in-lieu fees. In February 2023, the department collected $242,000 from UCSF to plant 105 replacement trees. Exactly zero have been planted so far. The department is not even using the funds they have right now. Furthermore, the department administratively canceled over 900 active 311 requests for tree replacement in empty sidewalk basins in December 2025.

The legislation also eliminates the public right to appeal "hazard" tree removals without defining what constitutes a hazard. This allows the City to label any inconvenient tree as hazardous to fast-track its removal without public oversight.

The City must reject this proposal entirely or substantially amend it. Any amendment must raise the fee to reflect the true cost of planting and maintaining a tree. It must strictly dictate where the funds are spent using clear definitions for "high environmental justice burden" and "low canopy." Finally, it must preserve the public's right to appeal tree removals and mandate transparency for hazard designations.

Sincerely,

[Your Name]
[Your Neighborhood]

Sent from my iPhone

From: Leo Goodyear
To: Carroll, John (BOS)
Subject: Public Comment Opposing Street Tree Amendments
Date: Saturday, March 7, 2026 1:16:27 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

I am writing to oppose the proposed amendments to San Francisco's street tree legislation.

Allowing developers to pay instead of planting trees will reduce the number of trees in our city. Removing or compressing the public's ability to appeal tree removals also reduces transparency and oversight.

San Francisco already has one of the smallest urban forests of any major U.S. city and is behind its own climate action goals for tree planting.

Please reject these amendments and prioritize policies that increase the city's tree canopy.

Thank you.

From:	Aaron Goodman
To:	CPC-Commissions Secretary; Carroll, John (BOS); Melgar, Myrna (BOS); Chen, Chyanne (BOS); Mahmood, Bilal (BOS)
Cc:	ChenStaff; MelgarStaff (BOS); MahmoodStaff; Gluckstein, Lisa (CPC); Lozano, Jesus (ENV); DPW, Urbanforestry (DPW); Short, Carla (DPW); Moore, David (DPW)
Subject:	Amend File 251211: Stop the Unregulated In-Lieu Fee Expansion
Date:	Saturday, March 7, 2026 1:16:20 PM

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Dear Members of the Land Use Committee, Planning Commission, and Urban Forestry Council,

I am writing to oppose the street tree legislation in Board File 251211.

Allowing developers to pay a $2,590 fee instead of planting a street tree is a gift to the real estate industry. Developers will choose the fee over navigating the City's planting requirements. The City must focus on streamlining the permitting process rather than allowing developers to buy their way out of providing essential green infrastructure.

This legislation is being sold under a false equity narrative. The legislative digest claims these pooled fees will go to "low-canopy areas." The actual text of the ordinance deposits these fees into the general Adopt-A-Tree Fund with no geographic spending restrictions. Without a statutory requirement to spend these funds in designated Environmental Justice communities, this expansion creates an unregulated slush fund.

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The City must reject this proposal entirely or substantially amend it. Any amendment must raise the fee to reflect the true cost of planting and maintaining a tree. It must strictly dictate where the funds are spent using clear definitions for "high environmental justice burden" and "low canopy." Finally, it must preserve the public's right to appeal tree removals and mandate transparency for hazard designations.

Sincerely,

Aaron Goodman
D7

Sent from my iPhone

From:	Boyan Bonev
To:	CPC-Commissions Secretary; Carroll, John (BOS); Melgar, Myrna (BOS); Chen, Chyanne (BOS); Mahmood, Bilal (BOS)
Cc:	ChenStaff; MelgarStaff (BOS); MahmoodStaff; Gluckstein, Lisa (CPC); Lozano, Jesus (ENV); DPW, Urbanforestry (DPW); Short, Carla (DPW); Moore, David (DPW)
Subject:	Amend File 251211: Stop the Unregulated In-Lieu Fee Expansion
Date:	Saturday, March 7, 2026 1:15:47 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Members of the Land Use Committee, Planning Commission, and Urban Forestry Council,

I am writing to oppose the street tree legislation in Board File 251211.

Allowing developers to pay a $2,590 fee instead of planting a street tree is a gift to the real estate industry. Developers will choose the fee over navigating the City's planting requirements. The City must focus on streamlining the permitting process rather than allowing developers to buy their way out of providing essential green infrastructure.

This legislation is being sold under a false equity narrative. The legislative digest claims these pooled fees will go to "low-canopy areas." The actual text of the ordinance deposits these fees into the general Adopt-A-Tree Fund with no geographic spending restrictions. Without a statutory requirement to spend these funds in designated Environmental Justice communities, this expansion creates an unregulated slush fund.

Public Works cannot manage its existing in-lieu fees. In February 2023, the department collected $242,000 from UCSF to plant 105 replacement trees. Exactly zero have been planted so far. The department is not even using the funds they have right now. Furthermore, the department administratively canceled over 900 active 311 requests for tree replacement in empty sidewalk basins in December 2025.

The legislation also eliminates the public right to appeal "hazard" tree removals without defining what constitutes a hazard. This allows the City to label any inconvenient tree as hazardous to fast-track its removal without public oversight.

The City must reject this proposal entirely or substantially amend it. Any amendment must raise the fee to reflect the true cost of planting and maintaining a tree. It must strictly dictate where the funds are spent using clear definitions for "high environmental justice burden" and "low canopy." Finally, it must preserve the public's right to appeal tree removals and mandate transparency for hazard designations.

Sincerely,

Boyan Ivanov Bonev
Miraloma Park

From:	Ben Glenn
To:	CPC-Commissions Secretary; Carroll, John (BOS); Melgar, Myrna (BOS); Chen, Chyanne (BOS); Mahmood, Bilal (BOS)
Cc:	ChenStaff; MelgarStaff (BOS); MahmoodStaff; Gluckstein, Lisa (CPC); Lozano, Jesus (ENV); DPW, Urbanforestry (DPW); Short, Carla (DPW); Moore, David (DPW)
Subject:	Amend File 251211: Stop the Unregulated In-Lieu Fee Expansion
Date:	Saturday, March 7, 2026 1:14:27 PM

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Dear Members of the Land Use Committee, Planning Commission, and Urban Forestry Council,

I am writing to oppose the street tree legislation in Board File 251211.

Allowing developers to pay a $2,590 fee instead of planting a street tree is a gift to the real estate industry. Developers will choose the fee over navigating the City's planting requirements. The City must focus on streamlining the permitting process rather than allowing developers to buy their way out of providing essential green infrastructure.

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The City must reject this proposal entirely or substantially amend it. Any amendment must raise the fee to reflect the true cost of planting and maintaining a tree. It must strictly dictate where the funds are spent using clear definitions for "high environmental justice burden" and "low canopy." Finally, it must preserve the public's right to appeal tree removals and mandate transparency for hazard designations.

Sincerely,

Benjamin Glenn
Mission

From:	Joni Eisen
To:	CPC-Commissions Secretary; Carroll, John (BOS); Melgar, Myrna (BOS); Chen, Chyanne (BOS); Mahmood, Bilal (BOS)
Cc:	ChenStaff; MelgarStaff (BOS); MahmoodStaff; Gluckstein, Lisa (CPC); Lozano, Jesus (ENV); DPW, Urbanforestry (DPW); Short, Carla (DPW); Moore, David (DPW)
Subject:	Amend File 251211: Stop the Unregulated In-Lieu Fee Expansion
Date:	Saturday, March 7, 2026 1:57:32 PM

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Dear Members of the Land Use Committee, Planning Commission, and Urban Forestry Council,

I am writing to oppose the street tree legislation in Board File 251211.

Allowing developers to pay a $2,590 fee instead of planting a street tree is a gift to the real estate industry. Developers will choose the fee over navigating the City's planting requirements. The City must focus on streamlining the permitting process rather than allowing developers to buy their way out of providing essential green infrastructure.

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Sincerely,

Joni Eisen
Potrero Hill, District 10

From:	Rebecca Miller
To:	CPC-Commissions Secretary; Carroll, John (BOS); Melgar, Myrna (BOS); Chen, Chyanne (BOS); Mahmood, Bilal (BOS)
Cc:	ChenStaff; MelgarStaff (BOS); MahmoodStaff; Gluckstein, Lisa (CPC); Lozano, Jesus (ENV); DPW, Urbanforestry (DPW); Short, Carla (DPW); Moore, David (DPW)
Subject:	Amend File 251211: Stop the Unregulated In-Lieu Fee Expansion
Date:	Saturday, March 7, 2026 1:58:29 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Members of the Land Use Committee, Planning Commission, and Urban Forestry Council,

I am writing to oppose the street tree legislation in Board File 251211.

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Public Works cannot manage its existing in-lieu fees. In February 2023, the department collected $242,000 from UCSF to plant 105 replacement trees. Exactly zero have been planted so far. The department is not even using the funds they have right now. Furthermore, the department administratively canceled over 900 active 311 requests for tree replacement in empty sidewalk basins in December 2025.

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Sincerely,

Rebecca Miller
SF Resident, 94122

From:	Ch Ho
To:	CPC-Commissions Secretary; Carroll, John (BOS); Melgar, Myrna (BOS); Chen, Chyanne (BOS); Mahmood, Bilal (BOS)
Cc:	ChenStaff; MelgarStaff (BOS); MahmoodStaff; Gluckstein, Lisa (CPC); Lozano, Jesus (ENV); DPW, Urbanforestry (DPW); Short, Carla (DPW); Moore, David (DPW)
Subject:	Amend File 251211: Stop the Unregulated In-Lieu Fee Expansion
Date:	Saturday, March 7, 2026 2:02:35 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Members of the Land Use Committee, Planning Commission, and Urban Forestry Council,

Tree canopy and green plants are vital to the city's beauty and health, both mental and physical. Please protect them with the due importance. The goal of city legislation should be to protect the interest of the people, not corporations.

I am writing to oppose the street tree legislation in Board File 251211. Allowing developers to pay a $2,590 fee instead of planting a street tree is a gift to the real estate industry. Developers will choose the fee over navigating the City's planting requirements. The City must focus on streamlining the permitting process rather than allowing developers to buy their way out of providing essential green infrastructure. This legislation is being sold under a false equity narrative. The legislative digest claims these pooled fees will go to "low-canopy areas." The actual text of the ordinance deposits these fees into the general Adopt-A-Tree Fund with no geographic spending restrictions. Without a statutory requirement to spend these funds in designated Environmental Justice communities, this expansion creates an unregulated slush fund. Public Works cannot manage its existing in-lieu fees. In February 2023, the department collected $242,000 from UCSF to plant 105 replacement trees. Exactly zero have been planted so far. The department is not even using the funds they have right now. Furthermore, the department administratively canceled over 900 active 311 requests for tree replacement in empty sidewalk basins in December 2025. The legislation also eliminates the public right to appeal "hazard" tree removals without defining what constitutes a hazard. This allows the City to label any inconvenient tree as hazardous to fast-track its removal without public oversight. The City must reject this proposal entirely or substantially amend it. Any amendment must raise the fee to reflect the true cost of planting and maintaining a tree. It must strictly dictate where the funds are spent using clear definitions for "high environmental justice burden" and "low canopy." Finally, it must preserve the public's right to appeal tree removals and mandate transparency for hazard designations.

Sincerely,
Chris H
Mission Dolores

From:	Colette Lafia
To:	CPC-Commissions Secretary; Carroll, John (BOS); Melgar, Myrna (BOS); Chen, Chyanne (BOS); Mahmood, Bilal (BOS)
Cc:	ChenStaff; MelgarStaff (BOS); MahmoodStaff; Gluckstein, Lisa (CPC); Lozano, Jesus (ENV); DPW, Urbanforestry (DPW); Short, Carla (DPW); Moore, David (DPW)
Subject:	Amend File 251211: Stop the Unregulated In-Lieu Fee Expansion
Date:	Saturday, March 7, 2026 2:04:38 PM

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I am writing to oppose the street tree legislation in Board File 251211.

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Sincerely,
Colette Lafia Gelade
Outer Richmond District

[Your Name]
[Your Neighborhood]

From: stephaniedemaria@icloud.com
To: Carroll, John (BOS)
Subject: Trees North beach
Date: Saturday, March 7, 2026 3:15:02 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Save our trees!!

From:	Kelly Flynn
To:	CPC-Commissions Secretary; Carroll, John (BOS); Melgar, Myrna (BOS); Chen, Chyanne (BOS); Mahmood, Bilal (BOS)
Cc:	ChenStaff; MelgarStaff (BOS); MahmoodStaff; Gluckstein, Lisa (CPC); Lozano, Jesus (ENV); DPW, Urbanforestry (DPW); Short, Carla (DPW); Moore, David (DPW)
Subject:	Amend File 251211: Stop the Unregulated In-Lieu Fee Expansion
Date:	Saturday, March 7, 2026 3:31:55 PM

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Dear Members of the Land Use Committee, Planning Commission, and Urban Forestry Council,

I am writing to oppose the street tree legislation in Board File 251211.

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Sincerely,

Kelly Flynn
SOMA West

From: Diana Gilbert
To: Carroll, John (BOS)
Subject: Plant the trees!
Date: Saturday, March 7, 2026 3:54:27 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Developers must not be given the choice on whether or not to plant trees in San Francisco. There are has been too much indiscriminate cutting of trees, especially by PG&E. To keep a livable urban environment, trees are essential and literally needed to give us oxygen to breath and to keep water from flowing into the sewers. Thank you

Diana Gilbert
Oxford Street
San Francisco

From:	Sean Millis
To:	CPC-Commissions Secretary; Carroll, John (BOS); Melgar, Myrna (BOS); Chen, Chyanne (BOS); Mahmood, Bilal (BOS)
Cc:	ChenStaff; MelgarStaff (BOS); MahmoodStaff; Gluckstein, Lisa (CPC); Lozano, Jesus (ENV); DPW, Urbanforestry (DPW); Short, Carla (DPW); Moore, David (DPW)
Subject:	Amend File 251211: Stop the Unregulated In-Lieu Fee Expansion
Date:	Saturday, March 7, 2026 5:58:31 PM

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Dear Members of the Land Use Committee, Planning Commission, and Urban Forestry Council,

I am writing to oppose the street tree legislation in Board File 251211.

Allowing developers to pay a $2,590 fee instead of planting a street tree is a gift to the real estate industry. Developers will choose the fee over navigating the City's planting requirements. The City must focus on streamlining the permitting process rather than allowing developers to buy their way out of providing essential green infrastructure.

This legislation is being sold under a false equity narrative. The legislative digest claims these pooled fees will go to "low-canopy areas." The actual text of the ordinance deposits these fees into the general Adopt-A-Tree Fund with no geographic spending restrictions. Without a statutory requirement to spend these funds in designated Environmental Justice communities, this expansion creates an unregulated slush fund.

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Sincerely,

Soma resident.

-- Sean

Sean Millis Functional Art

SMFA on Facebook
SMFA on Instagram
650.302.9907

From: Don Bliss
To: Carroll, John (BOS)
Subject: Trees
Date: Saturday, March 7, 2026 7:59:27 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Hello.

I am writing to express my opposition to the Mayor's recent proposals.

The City and its residents should be in charge of where and when trees are planted and removed, not developers, who may have no connection to the City whatsoever and no commitment to the quality of life here.

This proposal does not seem well considered. For example, the proposed fee-in-lieu-of: How was that amount determined? How will it be spent? There is NOTHING in the proposal addressing those questions.

Please do not pass this proposal.

Thanks you.

Regards,

Donald C. Bliss
District 8 Resident

"Imperfection is beauty, madness is genius, and it's better to be absolutely ridiculous than absolutely boring." ~ Marilyn Monroe -
https://url.avanan.click/v2/r01/___www.postsecret.com___.YXAzOnNmZHQyOmE6bzpiMzhkZDg4NjQxOTE4YTZiYTAwMzA5YTI1OTkwNTNmZTo3OmZkZGI6MDYxMTM4YTE3ZWUzNzBiNTJiNzFlZmVmODRhY2QyZjJmMjdlNjlmYzgwMzQ1MzIyMjFhNDFlZDU1YWNiMTQ4Nzp0OlQ6Tg
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From:	Andrew Ogus
To:	CPC-Commissions Secretary; Carroll, John (BOS); Melgar, Myrna (BOS); Chen, Chyanne (BOS); Mahmood, Bilal (BOS)
Cc:	ChenStaff; MelgarStaff (BOS); MahmoodStaff; Gluckstein, Lisa (CPC); Lozano, Jesus (ENV); DPW, Urbanforestry (DPW); Short, Carla (DPW); Moore, David (DPW)
Subject:	Amend File 251211: Stop the Unregulated In-Lieu Fee Expansion
Date:	Saturday, March 7, 2026 8:48:09 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Members of the Land Use Committee, Planning Commission, and Urban Forestry Council,

I am writing to oppose the street tree legislation in Board File 251211.

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The City must reject this proposal entirely or substantially amend it. Any amendment must raise the fee to reflect the true cost of planting and maintaining a tree. It must strictly dictate where the funds are spent using clear definitions for "high environmental justice burden" and "low canopy." Finally, it must preserve the public's right to appeal tree removals and mandate transparency for hazard designations.

Sincerely,

[Your Name]
[Your Neighborhood]

From:	Mary M
To:	CPC-Commissions Secretary; Carroll, John (BOS); Melgar, Myrna (BOS); Chen, Chyanne (BOS); Mahmood, Bilal (BOS)
Cc:	ChenStaff; MelgarStaff (BOS); MahmoodStaff; Gluckstein, Lisa (CPC); Lozano, Jesus (ENV); DPW, Urbanforestry (DPW); Short, Carla (DPW); Moore, David (DPW)
Subject:	Amend File 251211: Stop the Unregulated In-Lieu Fee Expansion
Date:	Saturday, March 7, 2026 8:55:57 PM

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Dear Members of the Land Use Committee, Planning Commission, and Urban Forestry Council,

I am writing to oppose the street tree legislation in Board File 251211.

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Sincerely,
Mary McFadden
Anza VIsta

From:	Caroline Ayres
To:	CPC-Commissions Secretary; Carroll, John (BOS); Melgar, Myrna (BOS); Chen, Chyanne (BOS); Mahmood, Bilal (BOS)
Cc:	ChenStaff; MelgarStaff (BOS); MahmoodStaff; Gluckstein, Lisa (CPC); Lozano, Jesus (ENV); DPW, Urbanforestry (DPW); Short, Carla (DPW); Moore, David (DPW)
Subject:	Amend File 251211: Stop the Unregulated In-Lieu Fee Expansion
Date:	Saturday, March 7, 2026 9:19:10 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Members of the Land Use Committee, Planning Commission, and Urban Forestry Council,

I am writing to strongly oppose the street tree legislation in Board File 251211.

Allowing developers to pay a $2,590 fee instead of planting a street tree is a gift to the real estate industry. Developers will choose the fee over navigating the City's planting requirements. The City must focus on streamlining the permitting process rather than allowing developers to buy their way out of providing essential green infrastructure.

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Sincerely,

Caroline Ayres
87 Dolores St., #105, San Francisco CA 94103

From:	Diane Serafini
To:	CPC-Commissions Secretary; Carroll, John (BOS); Melgar, Myrna (BOS); Chen, Chyanne (BOS); Mahmood, Bilal (BOS)
Cc:	ChenStaff; MelgarStaff (BOS); MahmoodStaff; Gluckstein, Lisa (CPC); Lozano, Jesus (ENV); DPW, Urbanforestry (DPW); Short, Carla (DPW); Moore, David (DPW)
Subject:	Amend File 251211: Stop the Unregulated In-Lieu Fee Expansion
Date:	Sunday, March 8, 2026 1:48:36 AM

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Dear Members of the Land Use Committee, Planning Commission, and Urban Forestry Council,

I am writing to oppose the street tree legislation in Board File 251211.

Allowing developers to pay a $2,590 fee instead of planting a street tree is a gift to the real estate industry. Developers will choose the fee over navigating the City's planting requirements. The City must focus on streamlining the permitting process rather than allowing developers to buy their way out of providing essential green infrastructure.

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Sincerely,

[Your Name]
[Your Neighborhood]

From:	lloyd affholter
To:	CPC-Commissions Secretary; Carroll, John (BOS); Melgar, Myrna (BOS); Chen, Chyanne (BOS); Mahmood, Bilal (BOS)
Cc:	ChenStaff; MelgarStaff (BOS); MahmoodStaff; Gluckstein, Lisa (CPC); Lozano, Jesus (ENV); DPW, Urbanforestry (DPW); Short, Carla (DPW); Moore, David (DPW)
Subject:	Amend File 251211: Stop the Unregulated In-Lieu Fee Expansion
Date:	Sunday, March 8, 2026 6:17:08 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Members of the Land Use Committee, Planning Commission, and Urban Forestry Council,

I am writing to oppose the street tree legislation in Board File 251211.

Allowing developers to pay a $2,590 fee instead of planting a street tree is a gift to the real estate industry. Developers will choose the fee over navigating the City's planting requirements. The City must focus on streamlining the permitting process rather than allowing developers to buy their way out of providing essential green infrastructure.

San Francisco, The City, Shame.

This legislation is being sold under a false equity narrative. The legislative digest claims these pooled fees will go to "low-canopy areas." The actual text of the ordinance deposits these fees into the general Adopt-A-Tree Fund with no geographic spending restrictions. Without a statutory requirement to spend these funds in designated Environmental Justice communities, this expansion creates an unregulated slush fund.

Public Works cannot manage its existing in-lieu fees. In February 2023, the department collected $242,000 from UCSF to plant 105 replacement trees. Exactly zero have been planted so far. The department is not even using the funds they have right now. Furthermore, the department administratively canceled over 900 active 311 requests for tree replacement in empty sidewalk basins in December 2025.

The legislation also eliminates the public right to appeal "hazard" tree removals without defining what constitutes a hazard. This allows the City to label any inconvenient tree as hazardous to fast-track its removal without public oversight.

The City must reject this proposal entirely or substantially amend it. Any amendment must raise the fee to reflect the true cost of planting and maintaining a tree. It must strictly dictate where the funds are spent using clear definitions for "high environmental justice burden" and "low canopy." Finally, it must preserve the public's right to appeal tree removals and mandate transparency for hazard designations.

Sincerely,

[Your Name]
[Your Neighborhood]

Sent from my T-Mobile 5G Device
Get Outlook for Android

From:	Christine Segalas
To:	CPC-Commissions Secretary; Carroll, John (BOS); Melgar, Myrna (BOS); Chen, Chyanne (BOS); Mahmood, Bilal (BOS)
Cc:	ChenStaff; MelgarStaff (BOS); MahmoodStaff; Gluckstein, Lisa (CPC); Lozano, Jesus (ENV); DPW, Urbanforestry (DPW); Short, Carla (DPW); Moore, David (DPW)
Subject:	Amend File 251211: Stop the Unregulated In-Lieu Fee Expansion
Date:	Sunday, March 8, 2026 6:46:40 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Members of the Land Use Committee, Planning Commission, and Urban Forestry Council,

I am writing to oppose the street tree legislation in Board File 251211.

I have personally witnessed how the loss of trees has affected the beauty of our city. I was told that the tree in front of my commercial restaurant would be replaced after a car ran it down. That was 8 years ago. I have, not only one, but two empty squares in the sidewalk for trees and our little block of the city is uglier for it. Tree lined streets in the city are disappearing at an incredible speed, and giving developers another reason to make our city ugly and cold is not right. Someone needs to take responsibility for this contemptible lack of caring for a treeless landscape.

Allowing developers to pay a $2,590 fee instead of planting a street tree is a gift to the real estate industry. Developers will choose the fee over navigating the City's planting requirements. The City must focus on streamlining the permitting process rather than allowing developers to buy their way out of providing essential green infrastructure.

This legislation is being sold under a false equity narrative. The legislative digest claims these pooled fees will go to "low-canopy areas." The actual text of the ordinance deposits these fees into the general Adopt-A-Tree Fund with no geographic spending restrictions. Without a statutory requirement to spend these funds in designated Environmental Justice communities, this expansion creates an unregulated slush fund.

Public Works cannot manage its existing in-lieu fees. In February 2023, the department collected $242,000 from UCSF to plant 105 replacement trees. Exactly zero have been planted so far. The department is not even using the funds they have right now. Furthermore, the department administratively canceled over 900 active 311 requests for tree replacement in empty sidewalk basins in December 2025.

The legislation also eliminates the public right to appeal "hazard" tree removals without defining what constitutes a hazard. This allows the City to label any inconvenient tree as hazardous to fast-track its removal without public oversight.

The City must reject this proposal entirely or substantially amend it. Any amendment must raise the fee to reflect the true cost of planting and maintaining a tree. It must strictly dictate where the funds are spent using clear definitions for "high environmental justice burden" and "low canopy." Finally, it must preserve the public's right to appeal tree removals and mandate transparency for hazard designations.

Sincerely,
Christine Segalas
SOMA

From:	Tammie White
To:	CPC-Commissions Secretary; Carroll, John (BOS); Melgar, Myrna (BOS); Chen, Chyanne (BOS); Mahmood, Bilal (BOS)
Cc:	ChenStaff; MelgarStaff (BOS); MahmoodStaff; Gluckstein, Lisa (CPC); Lozano, Jesus (ENV); DPW, Urbanforestry (DPW); Short, Carla (DPW); Moore, David (DPW)
Subject:	Amend File 251211: Stop the Unregulated In-Lieu Fee Expansion
Date:	Sunday, March 8, 2026 7:35:02 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Members of the Land Use Committee, Planning Commission, and Urban Forestry Council,

I am writing to oppose the street tree legislation in Board File 251211.

Allowing developers to pay a $2,590 fee instead of planting a street tree is a gift to the real estate industry. Developers will choose the fee over navigating the City's planting requirements. The City must focus on streamlining the permitting process rather than allowing developers to buy their way out of providing essential green infrastructure.

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Public Works cannot manage its existing in-lieu fees. In February 2023, the department collected $242,000 from UCSF to plant 105 replacement trees. Exactly zero have been planted so far. The department is not even using the funds they have right now. Furthermore, the department administratively canceled over 900 active 311 requests for tree replacement in empty sidewalk basins in December 2025.

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The City must reject this proposal entirely or substantially amend it. Any amendment must raise the fee to reflect the true cost of planting and maintaining a tree. It must strictly dictate where the funds are spent using clear definitions for "high environmental justice burden" and "low canopy." Finally, it must preserve the public's right to appeal tree removals and mandate transparency for hazard designations.

Sincerely,

Tammie White
Bernal Heights

Sent from my iPad

From:	Jen Schuetz
To:	CPC-Commissions Secretary; Carroll, John (BOS); Melgar, Myrna (BOS); Chen, Chyanne (BOS); Mahmood, Bilal (BOS)
Cc:	ChenStaff; MelgarStaff (BOS); MahmoodStaff; Gluckstein, Lisa (CPC); Lozano, Jesus (ENV); DPW, Urbanforestry (DPW); Short, Carla (DPW); Moore, David (DPW)
Subject:	Amend File 251211: Stop the Unregulated In-Lieu Fee Expansion
Date:	Sunday, March 8, 2026 9:47:58 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Members of the Land Use Committee, Planning Commission, and Urban Forestry Council,

I am writing to oppose the street tree legislation in Board File 251211.

Allowing developers to pay a $2,590 fee instead of planting a street tree is a gift to the real estate industry. Developers will choose the fee over navigating the City's planting requirements. The City must focus on streamlining the permitting process rather than allowing developers to buy their way out of providing essential green infrastructure.

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Public Works cannot manage its existing in-lieu fees. In February 2023, the department collected $242,000 from UCSF to plant 105 replacement trees. Exactly zero have been planted so far. The department is not even using the funds they have right now. Furthermore, the department administratively canceled over 900 active 311 requests for tree replacement in empty sidewalk basins in December 2025.

The legislation also eliminates the public right to appeal "hazard" tree removals without defining what constitutes a hazard. This allows the City to label any inconvenient tree as hazardous to fast-track its removal without public oversight.

The City must reject this proposal entirely or substantially amend it. Any amendment must raise the fee to reflect the true cost of planting and maintaining a tree. It must strictly dictate where the funds are spent using clear definitions for "high environmental justice burden" and "low canopy." Finally, it must preserve the public's right to appeal tree removals and mandate transparency for hazard designations.

Sincerely,

Jen Schuetz
Soma West

From:	Jean Weatherwax
To:	CPC-Commissions Secretary; Carroll, John (BOS); Melgar, Myrna (BOS); Chen, Chyanne (BOS); Mahmood, Bilal (BOS)
Cc:	ChenStaff; MelgarStaff (BOS); MahmoodStaff; Gluckstein, Lisa (CPC); Lozano, Jesus (ENV); DPW, Urbanforestry (DPW); Short, Carla (DPW); Moore, David (DPW)
Subject:	Amend File 251211: Stop the Unregulated In-Lieu Fee Expansion
Date:	Sunday, March 8, 2026 10:42:12 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Members of the Land Use Committee, Planning Commission, and Urban Forestry Council,

I am writing to oppose the street tree legislation in Board File 251211.

Allowing developers to pay a $2,590 fee instead of planting a street tree is a gift to the real estate industry. Developers will choose the fee over navigating the City's planting requirements. The City must focus on streamlining the permitting process rather than allowing developers to buy their way out of providing essential green infrastructure.

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The City must reject this proposal entirely or substantially amend it. Any amendment must raise the fee to reflect the true cost of planting and maintaining a tree. It must strictly dictate where the funds are spent using clear definitions for "high environmental justice burden" and "low canopy." Finally, it must preserve the public's right to appeal tree removals and mandate transparency for hazard designations.

Sincerely,

Jean Weatherwax
SoMa

Jean Weatherwax

Sent via Superhuman

From:	Laurie Dunlap
To:	CPC-Commissions Secretary; Carroll, John (BOS); Melgar, Myrna (BOS); Chen, Chyanne (BOS); Mahmood, Bilal (BOS)
Cc:	ChenStaff; MelgarStaff (BOS); MahmoodStaff; Gluckstein, Lisa (CPC); Lozano, Jesus (ENV); DPW, Urbanforestry (DPW); Short, Carla (DPW); Moore, David (DPW)
Subject:	Amend File 251211: Stop the Unregulated In-Lieu Fee Expansion
Date:	Sunday, March 8, 2026 10:48:29 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Members of the Land Use Committee, Planning Commission, and Urban Forestry Council,

I am writing to oppose the street tree legislation in Board File 251211.

Allowing developers to pay a $2,590 fee instead of planting a street tree is a gift to the real estate industry. Developers will choose the fee over navigating the City's planting requirements. The City must focus on streamlining the permitting process rather than allowing developers to buy their way out of providing essential green infrastructure.

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Public Works cannot manage its existing in-lieu fees. In February 2023, the department collected $242,000 from UCSF to plant 105 replacement trees. Exactly zero have been planted so far. The department is not even using the funds they have right now. Furthermore, the department administratively canceled over 900 active 311 requests for tree replacement in empty sidewalk basins in December 2025.

The legislation also eliminates the public right to appeal "hazard" tree removals without defining what constitutes a hazard. This allows the City to label any inconvenient tree as hazardous to fast-track its removal without public oversight.

The City must reject this proposal entirely or substantially amend it. Any amendment must raise the fee to reflect the true cost of planting and maintaining a tree. It must strictly dictate where the funds are spent using clear definitions for "high environmental justice burden" and "low canopy." Finally, it must preserve the public's right to appeal tree removals and mandate transparency for hazard designations.

San Francisco already has the smallest tree canopy of any other large city. It's shamefull! We need MORE TREES not fewer.

Sincerely,
Laurie Dunlap
Pacific Heights

From:	Michelle Moritz
To:	CPC-Commissions Secretary; Carroll, John (BOS); Melgar, Myrna (BOS); Chen, Chyanne (BOS); Mahmood, Bilal (BOS)
Cc:	ChenStaff; MelgarStaff (BOS); MahmoodStaff; Gluckstein, Lisa (CPC); Lozano, Jesus (ENV); DPW, Urbanforestry (DPW); Short, Carla (DPW); Moore, David (DPW)
Subject:	Amend File 251211: Stop the Unregulated In-Lieu Fee Expansion
Date:	Sunday, March 8, 2026 12:33:28 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Members of the Land Use Committee, Planning Commission, and Urban Forestry Council,

I am writing to oppose the street tree legislation in Board File 251211.

Allowing developers to pay a $2,590 fee instead of planting a street tree is a gift to the real estate industry. Developers will choose the fee over navigating the City's planting requirements. The City must focus on streamlining the permitting process rather than allowing developers to buy their way out of providing essential green infrastructure.

This legislation is being sold under a false equity narrative. The legislative digest claims these pooled fees will go to "low-canopy areas." The actual text of the ordinance deposits these fees into the general Adopt-A-Tree Fund with no geographic spending restrictions. Without a statutory requirement to spend these funds in designated Environmental Justice communities, this expansion creates an unregulated slush fund.

Public Works cannot manage its existing in-lieu fees. In February 2023, the department collected $242,000 from UCSF to plant 105 replacement trees. Exactly zero have been planted so far. The department is not even using the funds they have right now. Furthermore, the department administratively canceled over 900 active 311 requests for tree replacement in empty sidewalk basins in December 2025.

The legislation also eliminates the public right to appeal "hazard" tree removals without defining what constitutes a hazard. This allows the City to label any inconvenient tree as hazardous to fast-track its removal without public oversight.

The City must reject this proposal entirely or substantially amend it. Any amendment must raise the fee to reflect the true cost of planting and maintaining a tree. It must strictly dictate where the funds are spent using clear definitions for "high environmental justice burden" and "low canopy." Finally, it must preserve the public's right to appeal tree removals and mandate transparency for hazard designations.

Sincerely,

Michelle Moritz
Outer Richmond, 28th Ave.

From:	Sammy Hodroge
To:	CPC-Commissions Secretary; Carroll, John (BOS); Melgar, Myrna (BOS); Chen, Chyanne (BOS); Mahmood, Bilal (BOS)
Cc:	ChenStaff; MelgarStaff (BOS); MahmoodStaff; Gluckstein, Lisa (CPC); Lozano, Jesus (ENV); DPW, Urbanforestry (DPW); Short, Carla (DPW); Moore, David (DPW)
Subject:	Amend File 251211: Stop the Unregulated In-Lieu Fee Expansion
Date:	Sunday, March 8, 2026 3:21:45 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Members of the Land Use Committee, Planning Commission, and Urban Forestry Council,

I am writing to oppose the street tree legislation in Board File 251211.

Allowing developers to pay a $2,590 fee instead of planting a street tree is a gift to the real estate industry. Developers will choose the fee over navigating the City's planting requirements. The City must focus on streamlining the permitting process rather than allowing developers to buy their way out of providing essential green infrastructure.

This legislation is being sold under a false equity narrative. The legislative digest claims these pooled fees will go to "low-canopy areas." The actual text of the ordinance deposits these fees into the general Adopt-A-Tree Fund with no geographic spending restrictions. Without a statutory requirement to spend these funds in designated Environmental Justice communities, this expansion creates an unregulated slush fund.

Public Works cannot manage its existing in-lieu fees. In February 2023, the department collected $242,000 from UCSF to plant 105 replacement trees. Exactly zero have been planted so far. The department is not even using the funds they have right now. Furthermore, the department administratively canceled over 900 active 311 requests for tree replacement in empty sidewalk basins in December 2025.

The legislation also eliminates the public right to appeal "hazard" tree removals without defining what constitutes a hazard. This allows the City to label any inconvenient tree as hazardous to fast-track its removal without public oversight.

The City must reject this proposal entirely or substantially amend it. Any amendment must raise the fee to reflect the true cost of planting and maintaining a tree. It must strictly dictate where the funds are spent using clear definitions for "high environmental justice burden" and "low canopy." Finally, it must preserve the public's right to appeal tree removals and mandate transparency for hazard designations.

Sincerely,

Sammy Hodroge
Mission District

From:	Kathy Howard
To:	CPC-Commissions Secretary; Carroll, John (BOS); Melgar, Myrna (BOS); Chen, Chyanne (BOS); Mahmood, Bilal (BOS)
Cc:	ChenStaff; MelgarStaff (BOS); MahmoodStaff; Gluckstein, Lisa (CPC); Lozano, Jesus (ENV); DPW, Urbanforestry (DPW); Short, Carla (DPW); Moore, David (DPW)
Subject:	PLEASE REJECT File 251211 COMPLETELY
Date:	Sunday, March 8, 2026 7:53:16 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Members of the Land Use Committee, Planning Commission, and Urban Forestry Council,

I am writing to oppose the street tree legislation in Board File 251211. The City must reject this proposal entirely . It is a 'solution' looking for a problem. *Please encourage both the Mayor and Supervisor Wong to pull this legislation.*

Whom does this legislation benefit? It is easy to see that allowing developers to pay a $2,590 fee instead of planting a street tree is a gift to the real estate industry. Developers will choose the fee over the simple act of directing their landscape architects to leave planting holes for the trees and then specify the tree.

The legislation also eliminates the public right to appeal "hazard" tree removals without defining what constitutes a hazard. This allows a city department to label any inconvenient tree or disliked species of tree as hazardous to fast-track its removal without public oversight.

This kind of heavy-handed top-down rule that eliminates citizen participation is what we are experiencing nationally. It does not fit San Francisco's values, and it will be detrimental to our urban forest.

Sincerely,

Katherine Howard
Sunset District – D 4

From:	Alice Rogers
To:	CPC-Commissions Secretary; Carroll, John (BOS); Melgar, Myrna (BOS); Chen, Chyanne (BOS); Mahmood, Bilal (BOS)
Cc:	ChenStaff; MelgarStaff (BOS); MahmoodStaff; Gluckstein, Lisa (CPC); Lozano, Jesus (ENV); DPW, Urbanforestry (DPW); Short, Carla (DPW); Moore, David (DPW); DorseyStaff (BOS)
Subject:	Amend File 251211: Stop the Unregulated In-Lieu Fee Expansion
Date:	Sunday, March 8, 2026 9:29:00 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Members of the Land Use Committee, Planning Commission, and Urban Forestry Council,

I am writing to oppose the street tree legislation in Board File 251211 unless substantially amended to ensure a clear and transparent process to ensure in-lieu-funded trees actually get planted in priority equity-identified areas and that the definition of ‘hazardous trees’ but closely and reasonably defined. Having fought to save the still-healthy magnolias on 3rd St between Harrison and Folsom, I have seen first-hand how unfounded tree-removal requests can be.

Allowing developers to pay a $2,590 fee instead of planting a street tree is a gift to the real estate industry. Developers will choose the fee over navigating the City's planting requirements. The City must focus on streamlining the permitting process rather than allowing developers to buy their way out of providing essential green infrastructure.

This legislation is being sold under a false equity narrative. The legislative digest claims these pooled fees will go to "low-canopy areas." The actual text of the ordinance deposits these fees into the general Adopt-A-Tree Fund with no geographic spending restrictions. Without a statutory requirement to spend these funds in designated Environmental Justice communities, this expansion creates an unregulated slush fund.

Public Works cannot manage its existing in-lieu fees. In February 2023, the department collected $242,000 from UCSF to plant 105 replacement trees. Exactly zero have been planted so far. The department is not even using the funds they have right now. Furthermore, the department administratively canceled over 900 active 311 requests for tree replacement in empty sidewalk basins in December 2025.

The legislation also eliminates the public right to appeal "hazard" tree removals without defining what constitutes a hazard. This allows the City to label any inconvenient tree as hazardous to fast-track its removal without public oversight.

The City must reject this proposal entirely or substantially amend it. Any amendment must raise the fee to reflect the true cost of planting and maintaining a tree. It must strictly dictate where the funds are spent using clear definitions for "high environmental justice burden" and "low canopy." Finally, it must preserve the public's right to appeal tree removals and mandate transparency for hazard designations.

Sincerely,

Alice Rogers

.....

Alice Rogers
10 South Park St
Studio 2
San Francisco, CA 94107

arcomnsf@pacbell.net

From:	Nikhil Gowda
To:	CPC-Commissions Secretary; Carroll, John (BOS); Melgar, Myrna (BOS); Chen, Chyanne (BOS); Mahmood, Bilal (BOS)
Cc:	ChenStaff; MelgarStaff (BOS); MahmoodStaff; Gluckstein, Lisa (CPC); Lozano, Jesus (ENV); DPW, Urbanforestry (DPW); Short, Carla (DPW); Moore, David (DPW)
Subject:	Amend File 251211: Stop the Unregulated In-Lieu Fee Expansion
Date:	Sunday, March 8, 2026 11:24:38 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Members of the Land Use Committee, Planning Commission, and Urban Forestry Council,

I am writing to oppose the street tree legislation in Board File 251211.

Allowing developers to pay a $2,590 fee instead of planting a street tree is a gift to the real estate industry. Developers will choose the fee over navigating the City's planting requirements. The City must focus on streamlining the permitting process rather than allowing developers to buy their way out of providing essential green infrastructure.

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The City must reject this proposal entirely or substantially amend it. Any amendment must raise the fee to reflect the true cost of planting and maintaining a tree. It must strictly dictate where the funds are spent using clear definitions for "high environmental justice burden" and "low canopy." Finally, it must preserve the public's right to appeal tree removals and mandate transparency for hazard designations.

Sincerely,

Nikhil Gowda
West SoMa (8th and Tehama)

From:	Nikhil Gowda
To:	CPC-Commissions Secretary; Carroll, John (BOS); Melgar, Myrna (BOS); Chen, Chyanne (BOS); Mahmood, Bilal (BOS)
Cc:	ChenStaff; MelgarStaff (BOS); MahmoodStaff; Gluckstein, Lisa (CPC); Lozano, Jesus (ENV); DPW, Urbanforestry (DPW); Short, Carla (DPW); Moore, David (DPW)
Subject:	Amend File 251211: Stop the Unregulated In-Lieu Fee Expansion
Date:	Sunday, March 8, 2026 11:24:59 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Members of the Land Use Committee, Planning Commission, and Urban Forestry Council,

I am writing to oppose the street tree legislation in Board File 251211.

Allowing developers to pay a $2,590 fee instead of planting a street tree is a gift to the real estate industry. Developers will choose the fee over navigating the City's planting requirements. The City must focus on streamlining the permitting process rather than allowing developers to buy their way out of providing essential green infrastructure.

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Sincerely,

Nikhil Gowda
West SoMA (8th and Tehama)

From:	Cara Pardo
To:	CPC-Commissions Secretary; Carroll, John (BOS); Melgar, Myrna (BOS); Chen, Chyanne (BOS); Mahmood, Bilal (BOS)
Cc:	ChenStaff; MelgarStaff (BOS); MahmoodStaff; Gluckstein, Lisa (CPC); Lozano, Jesus (ENV); DPW, Urbanforestry (DPW); Short, Carla (DPW); Moore, David (DPW)
Subject:	Amend File 251211: Stop the Unregulated In-Lieu Fee Expansion
Date:	Monday, March 9, 2026 9:21:59 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Members of the Land Use Committee, Planning Commission, and Urban Forestry Council,

I am writing to oppose the street tree legislation in Board File 251211.

The proposed $2,590 in-lieu fee allows developers to bypass planting requirements rather than addressing the need for a streamlined permitting process. Furthermore, the legislation lacks geographic spending restrictions; without statutory requirements to fund Environmental Justice communities, these fees remain unregulated. Public Works has already demonstrated an inability to manage such funds, as seen with the unfulfilled 2023 UCSF tree replacement project and the 2025 cancellation of 311 tree requests. Finally, the bill eliminates public appeals for "hazard" removals without defining the criteria for such a designation.

The City must reject this proposal or amend it to:

- Increase fees to reflect true planting and maintenance costs.
- Mandate spending in "low-canopy" and "high environmental justice burden" areas.
- Preserve public appeal rights and ensure transparency for hazard designations.

Sincerely,
Cara Pardo

From:	Daniel Filipkowski
To:	CPC-Commissions Secretary; Carroll, John (BOS); Melgar, Myrna (BOS); Chen, Chyanne (BOS); Mahmood, Bilal (BOS)
Cc:	ChenStaff; MelgarStaff (BOS); MahmoodStaff; Gluckstein, Lisa (CPC); Lozano, Jesus (ENV); DPW, Urbanforestry (DPW); Short, Carla (DPW); Moore, David (DPW)
Subject:	Amend File 251211: Stop the Unregulated In-Lieu Fee Expansion
Date:	Monday, March 9, 2026 9:29:36 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Members of the Land Use Committee, Planning Commission, and Urban Forestry Council,

I am writing to oppose the street tree legislation in Board File 251211.

Allowing developers to pay a $2,590 fee instead of planting a street tree is a gift to the real estate industry. Developers will choose the fee over navigating the City's planting requirements. The City must focus on streamlining the permitting process rather than allowing developers to buy their way out of providing essential green infrastructure.

This legislation is being sold under a false equity narrative. The legislative digest claims these pooled fees will go to "low-canopy areas." The actual text of the ordinance deposits these fees into the general Adopt-A-Tree Fund with no geographic spending restrictions. Without a statutory requirement to spend these funds in designated Environmental Justice communities, this expansion creates an unregulated slush fund.

Public Works cannot manage its existing in-lieu fees. In February 2023, the department collected $242,000 from UCSF to plant 105 replacement trees. Exactly zero have been planted so far. The department is not even using the funds they have right now. Furthermore, the department administratively canceled over 900 active 311 requests for tree replacement in empty sidewalk basins in December 2025.

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Sincerely,

Daniel Filipkowski
Yerba Buena/East Cut, District 6

From:	Anna Papitto
To:	CPC-Commissions Secretary; Carroll, John (BOS); Melgar, Myrna (BOS); Chen, Chyanne (BOS); Mahmood, Bilal (BOS)
Cc:	ChenStaff; MelgarStaff (BOS); MahmoodStaff; Gluckstein, Lisa (CPC); Lozano, Jesus (ENV); DPW, Urbanforestry (DPW); Short, Carla (DPW); Moore, David (DPW)
Subject:	Amend File 251211: Stop the Unregulated In-Lieu Fee Expansion
Date:	Monday, March 9, 2026 10:17:32 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Members of the Land Use Committee, Planning Commission, and Urban Forestry Council,

I am writing to oppose the street tree legislation in Board File 251211.

Allowing developers to pay a $2,590 fee instead of planting a street tree is a gift to the real estate industry. Developers will choose the fee over navigating the City's planting requirements. The City must focus on streamlining the permitting process rather than allowing developers to buy their way out of providing essential green infrastructure.

This legislation is being sold under a false equity narrative. The legislative digest claims these pooled fees will go to "low-canopy areas." The actual text of the ordinance deposits these fees into the general Adopt-A-Tree Fund with no geographic spending restrictions. Without a statutory requirement to spend these funds in designated Environmental Justice communities, this expansion creates an unregulated slush fund.

Public Works cannot manage its existing in-lieu fees. In February 2023, the department collected $242,000 from UCSF to plant 105 replacement trees. Exactly zero have been planted so far. The department is not even using the funds they have right now. Furthermore, the department administratively canceled over 900 active 311 requests for tree replacement in empty sidewalk basins in December 2025.

The legislation also eliminates the public right to appeal "hazard" tree removals without defining what constitutes a hazard. This allows the City to label any inconvenient tree as hazardous to fast-track its removal without public oversight.

The City must reject this proposal entirely or substantially amend it. Any amendment must raise the fee to reflect the true cost of planting and maintaining a tree. It must strictly dictate where the funds are spent using clear definitions for "high environmental justice burden" and "low canopy." Finally, it must preserve the public's right to appeal tree removals and mandate transparency for hazard designations.

Sincerely,

Anna Papitto
Noe Valley

From:	Board of Supervisors (BOS)
To:	BOS-Supervisors; BOS-Legislative Aides
Cc:	Calvillo, Angela (BOS); Somera, Alisa (BOS); Ng, Wilson (BOS); De Asis, Edward (BOS); Entezari, Mehran (BOS); Carroll, John (BOS)
Subject:	FW: Amend File 251211: Stop the Unregulated In-Lieu Fee Expansion
Date:	Monday, March 9, 2026 9:59:34 AM

Dear Supervisors,

Please see the below communication regarding File No. 251211.

File No. 251211 - Ordinance amending the Public Works Code to allow development projects to satisfy street tree planting requirements through payment of an in lieu fee or providing alternative landscaping; exempt accessory dwelling units from street tree planting requirements; eliminate appeals to the Board of Appeals for tree removals undertaken by City departments and commissions; and update in lieu fee reporting requirements; amending the Administrative Code to create a separate account within the Adopt-A-Tree Fund to receive in lieu fees for street tree requirements; amending the Planning Code to update street tree applicability requirements; affirming the Planning Department's determination under the California Environmental Quality Act; making findings of consistency with the General Plan, and the eight priority policies of Planning Code, Section 101.1; and making public necessity, convenience, and welfare findings under Planning Code, Section 302.

Thank you,

Eileen McHugh
Executive Assistant
Office of the Clerk of the Board
Board of Supervisors
1 Dr. Carlton B. Goodlett Place, City Hall, Room 244
San Francisco, CA 94102-4689
Phone: (415) 554-7703 | Fax: (415) 554-5163
eileen.e.mchugh@sfgov.org| www.sfbos.org

From: Michael Nulty <sf_district6@yahoo.com>
Sent: Saturday, March 7, 2026 4:16 PM
To: CPC-Commissions Secretary <commissions.secretary@sfgov.org>
Subject: Amend File 251211: Stop the Unregulated In-Lieu Fee Expansion

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Members of the Land Use Committee, Planning Commission, and Urban Forestry Council:

The Alliance for a Better District 6 is writing to strongly oppose the proposed street tree legislation in Board File 251211, introduced by the Mayor and Supervisor Wong. This ordinance would amend the Public Works Code, Administrative Code, and Planning Code to allow developers to satisfy mandatory street tree planting requirements for new development projects by paying an in-lieu fee—currently set at $2,590 per tree—rather than actually planting and maintaining the required trees on-site or in the public right-of-way. It would also exempt accessory dwelling units (ADUs) and junior ADUs from these planting requirements entirely, eliminate the public's right to appeal tree removals classified as "hazardous" by City departments and commissions to the Board of Appeals, and create a separate account within the existing Adopt-A-Tree Fund to receive these in-lieu fees (with updated reporting requirements but no binding geographic or programmatic restrictions on spending).

This proposal represents a substantial giveaway to the real estate development industry at the expense of San Francisco's urban forest, environmental health, and equitable access to green infrastructure. Developers, facing the complexities of navigating the City's existing street tree planting requirements—including site assessments, species selection, infrastructure conflicts, and long-term maintenance obligations—will overwhelmingly opt to pay the relatively modest in-lieu fee instead of fulfilling their responsibility to plant trees. Rather than addressing legitimate barriers through meaningful reforms, such as streamlining the permitting process, improving coordination between departments, or providing clearer guidance and technical assistance to developers, this legislation simply allows them to pay to avoid compliance altogether. The result will be fewer on-site street trees in new developments, reduced canopy in growing neighborhoods, and diminished public benefits such as shade, air quality improvement, stormwater management, and biodiversity.

The legislation is being promoted under a misleading equity narrative. The legislative digest and public justifications suggest that pooled in-lieu fees will be directed toward "low-canopy areas" or communities with high environmental justice burdens. However, the actual text of the ordinance deposits these funds into the Adopt-A-Tree Fund (with a new separate account for street tree in-lieu fees) without any statutory mandates, geographic restrictions, or enforceable requirements to prioritize spending in underserved or low-canopy neighborhoods. Without clear definitions—such

as those tied to established Environmental Justice screening tools or low-canopy thresholds—and binding allocation priorities, this creates the risk of an unregulated pool of funds that could be spent anywhere in the City, undermining claims of equity-focused outcomes.

Compounding these concerns is the Department of Public Works' (DPW) demonstrated inability to effectively manage and deploy existing in-lieu fees and tree replacement funds. For example, in February 2023, DPW's Bureau of Urban Forestry collected approximately $242,000 from UCSF as an in-lieu payment for 105 replacement trees related to a project mitigation requirement. As of recent records, **none** of those replacement trees have been planted, leaving the funds unspent and the mitigation unfulfilled years later. This pattern of underperformance raises serious doubts about DPW's capacity to responsibly administer an expanded in-lieu fee program.

Even more troubling, in December 2025, DPW administratively canceled over 900 active 311 service requests specifically for tree replacements in empty sidewalk tree basins across the City. These cancellations occurred without public notice, community input, or meaningful replacement efforts, further eroding trust in the department's commitment to maintaining and expanding the urban canopy.Additionally, the proposal eliminates the public's current right to appeal "hazard" tree removals to the Board of Appeals when such removals are initiated by City departments or commissions. It does so without providing a clear, objective definition or transparent criteria for what qualifies as a "hazard" tree (beyond the existing vague reference to "imminent hazard to person or property"). This change risks enabling arbitrary or expedited removals of healthy or inconvenient trees under the "hazard" label, bypassing public oversight and accountability.

For these reasons, we urge the City to reject Board File 251211 in its current form. If the proposal is not withdrawn entirely, any acceptable amendments must include the following critical changes:

- Substantially increase the in-lieu fee to reflect the full, true cost of planting, establishing, and maintaining a mature street tree over its lifetime (including labor, materials, watering, pruning, risk management, and replacement if needed), ensuring the fee is high enough to make on-site planting the clear preference for developers.
- Establish strict, enforceable requirements on the geographic and programmatic use of in-lieu fees, such as mandating that a significant portion (or all) be spent in designated low-canopy areas and/or high environmental justice burden communities, using clear, data-driven

definitions (e.g., based on tree canopy cover maps, CalEnviroScreen scores, or similar metrics).

- Preserve and strengthen the public's right to appeal tree removals—including hazard designations—to the Board of Appeals, while requiring transparent, evidence-based criteria, documentation, and public notice for any hazard classification.
- Mandate full transparency in reporting, including annual public disclosures of in-lieu fee collections, expenditures, locations of plantings funded by the fees, and progress on backlog replacement projects.

San Francisco's urban forest is a vital public asset that requires protection and expansion, not policies that facilitate its diminishment. We ask that you prioritize genuine solutions that increase tree canopy equitably and hold City departments accountable for existing obligations.

Sincerely,

Michael NultyExecutive Director
Alliance for a Better District 6

Michael Nulty

P.O. Box 420782
San Francisco, CA 94142-0782
(415) 339-8327 - Direct
(415) 339-8779 - Alliance for a Better District 6
(415) 339-8683 - Central City Democrats
(415) 937-1289 - North of Market Business Association

http://abd6.cfsites.org/

From:	Board of Supervisors (BOS)
To:	BOS-Supervisors; BOS-Legislative Aides
Cc:	Calvillo, Angela (BOS); Somera, Alisa (BOS); Ng, Wilson (BOS); De Asis, Edward (BOS); Mchugh, Eileen (BOS); BOS-Operations; BOS Legislation, (BOS); Carroll, John (BOS)
Subject:	FW: Please, reject File #251211 amending San Francisco"s Public Works Code Article 16.
Date:	Wednesday, March 4, 2026 9:45:57 AM

Hello,

Please see below for communication from Melissa Kite regarding File No. 251211.

> **File No. 251211:** Ordinance amending the Public Works Code to allow development projects to satisfy street tree planting requirements through payment of an in lieu fee or providing alternative landscaping; exempt accessory dwelling units from street tree planting requirements; eliminate appeals to the Board of Appeals for tree removals undertaken by City departments and commissions; and update in lieu fee reporting requirements; amending the Administrative Code to create a separate account within the Adopt-A-Tree Fund to receive in lieu fees for street tree requirements; amending the Planning Code to update street tree applicability requirements; affirming the Planning Department's determination under the California Environmental Quality Act; making findings of consistency with the General Plan, and the eight priority policies of Planning Code, Section 101.1; and making public necessity, convenience, and welfare findings under Planning Code, Section 302. (Mayor, Wong)

Sincerely,

Joe Adkins
Office of the Clerk of the Board
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
Phone: (415) 554-5184 | Fax: (415) 554-5163
board.of.supervisors@sfgov.org | www.sfbos.org

From: Melissa Kite <melissakite@sbcglobal.net>
Sent: Tuesday, March 3, 2026 10:01 AM
To: Board of Supervisors (BOS) <board.of.supervisors@sfgov.org>
Subject: Please, reject File #251211 amending San Francisco's Public Works Code Article 16.

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear supervisors,

I appreciate the opportunity to have a voice in the upcoming legislation regarding

trees in San Francisco. I love trees and everyone I know loves trees. It often feels like the residents of SF have no voice, especially when it comes to trees.

I would appreciate it if you could vote against the legislation that would give Recreation & Parks carte blanche removal of trees. I would also like you to vote against the proposed legislation that would allow builders to no longer be required to plant trees nor provide space for them when constructing new buildings.

Many of the residents of San Francisco have no front or backyards. We rely on the public spaces for the greenery that is good for our well-being. If the beauty of trees is not enough reason to keep them, then maybe the fact that adult trees reduce our carbon footprint is.

I long ago resigned myself to the fact that the Botanical Gardens belongs to the Botanical Society, not to the residents of SF. But recently, I witnessed the removal of a grove of tall trees lining the sidewalk outside the Garden's fence. When I asked why—the reason I was given was that they were non-native and would be replaced with native ones. So maybe in thirty years, we can enjoy them.

I remember years ago, coming here for graduate school and discovering Land's End. It was so magical—like I was in a fairy tale. The same was true with the Presidio and the Park.

Golden Gate Park was created for everyday people who could not afford to go to the countryside. The first planner for the park turned sand dunes into a woodland. Wow.

How lucky we are to be able grow trees from all over the world, which adds diversity to our landscape (just like our population) and ultimately adds to our beauty, our magnificence.

I will end with a quote from the landscape architect who created Golden Gate Park, William Hammond Hall:

"Destroy a public building and it can be rebuilt in a year; destroy a city woodland park and all the people living will have passed away before its restoration can be effected"

Thank you so much for taking the time to read this.

Sincerely,

Melissa Kite

Resident of District 7

From:	Board of Supervisors (BOS)
To:	BOS-Supervisors; BOS-Legislative Aides
Cc:	BOS-Operations; Carroll, John (BOS); Calvillo, Angela (BOS); De Asis, Edward (BOS); Entezari, Mehran (BOS); Mchugh, Eileen (BOS); Ng, Wilson (BOS); Somera, Alisa (BOS)
Subject:	FW: Request to Continue File# 251211 Pending Inquiry
Date:	Thursday, January 29, 2026 10:59:28 AM
Attachments:	Request for Inquiry - Assemblymember Matt Haney (Dec 16, 2025).pdf Letter of Inquiry - Supervisor Matt Dorsey (Jan 27, 2026).pdf

Hello,

Please see attached and below communication regarding **File No. 251211:**

Ordinance amending the Public Works Code to allow development projects to satisfy street tree planting requirements through payment of an in lieu fee or providing alternative landscaping; exempt accessory dwelling units from street tree planting requirements; eliminate appeals to the Board of Appeals for tree removals undertaken by City departments and commissions; and update in lieu fee reporting requirements; amending the Administrative Code to create a separate account within the Adopt-A-Tree Fund to receive in lieu fees for street tree requirements; amending the Planning Code to update street tree applicability requirements; affirming the Planning Department's determination under the California Environmental Quality Act; making findings of consistency with the General Plan, and the eight priority policies of Planning Code, Section 101.1; and making public necessity, convenience, and welfare findings under Planning Code, Section 302.

Regards,

John Bullock
Office of the Clerk of the Board
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
(415) 554-5184
BOS@sfgov.org | www.sfbos.org

Disclosures: *Personal information that is provided in communications to the Board of Supervisors is subject to disclosure under the California Public Records Act and the San Francisco Sunshine Ordinance. Personal information provided will not be redacted. Members of the public are not required to provide personal identifying information when they communicate with the Board of Supervisors and its committees. All written or oral communications that members of the public submit to the Clerk's Office regarding pending legislation or hearings will be made available to all members of the public for inspection and copying. The Clerk's Office does not redact any information from these submissions. This means that personal information—including names, phone numbers, addresses and similar information that a member of the public elects to submit to the Board and its committees—may appear on the Board of Supervisors website or in other public documents that members of the public may inspect or copy.*

From: Shaun Aukland <shaun.aukland@gmail.com>
Sent: Wednesday, January 28, 2026 9:20 AM
To: Melgar, Myrna (BOS) <Myrna.Melgar@sfgov.org>; CPC-Commissions Secretary <commissions.secretary@sfgov.org>; Carroll, John (BOS) <john.carroll@sfgov.org>; Dennis Phillips, Sarah (CPC) <sarah.dennis-phillips@sfgov.org>
Cc: Ionin, Jonas (CPC) <jonas.ionin@sfgov.org>; Board of Supervisors (BOS) <board.of.supervisors@sfgov.org>; Mahmood, Bilal (BOS) <bilal.mahmood@sfgov.org>; Chen, Chyanne (BOS) <chyanne.chen@sfgov.org>; Wong, Alan (BOS) <alan.wong@sfgov.org>; Gluckstein, Lisa (CPC) <lisa.gluckstein@sfgov.org>
Subject: Request to Continue File# 251211 Pending Inquiry

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Chair Melgar, President So, Supervisors, and Commissioners,

I am writing on behalf of FairTrees.org to formally request that File No. 251211 (Public Works, Administrative, Planning Codes - Street Trees) be Continued pending two ongoing inquiries into the Department.

It would be legislatively irresponsible for this Committee to vote on expanding the Department of Public Works' authority (by eliminating public appeals) while the Department is currently the subject of two separate, high-level inquiries regarding mismanagement and potential statutory violations.

They are:

1. A city charter inquiry from Supervisor Dorsey. Yesterday, Supervisor Dorsey submitted a formal Letter of Inquiry (LOI). As detailed in the attached document, the Board is now actively investigating:

- Inequitable spending - The potential diversion of grant funds away from priority Environmental Justice communities. This is relevant because the proposed in-leiu fees are to be directed toward undefined "low canopy neighborhoods".
- Potential falsification of data - The administrative closure of over 900 constituent service requests without action.
- Operational failure: The lack of required impact analysis for existing policies that harm Environmental Justice communities (like Public Works Order 187246, issued by Mohammed Nuru).

2. A state law inquiry from California DOJ, recommended by Assemblymember

Haney. Simultaneously, Assemblymember Matt Haney has formally requested an investigation by the California Attorney General regarding the City's potential violation of State Law (SB 1000).

As detailed in the attached letter to the AG, the State is reviewing whether the Department's current policies create "containment zones" that withhold environmental improvements for protected neighborhoods, in violation of state civil rights and environmental justice statutes.

Put together, the conclusion is clear -- the Department of Public Works is currently under scrutiny for potentially failing to execute its *existing* urban forestry duties fairly and legally. This is precisely the wrong moment to remove the public's only remaining check on that power: the right to appeal before an independent Board.

We respectfully urge the Committee to hold this item until the Department has provided the written responses required by the City Charter and resolved the outstanding questions regarding its compliance with State Law.

Thank you,

Shaun Aukland
FairTrees.org

Attachments (please add both to the legislative record for 251211):

- Letter of Inquiry - Supervisor Matt Dorsey (Jan 27, 2026)
- Request for Inquiry - Assemblymember Matt Haney (Dec 16, 2025)

STATE CAPITOL
P.O. BOX 942849
SACRAMENTO, CA 94249-0017
(916) 319-2017
FAX (916) 319-2117

E-MAIL
Assemblymember.Haney@assembly.ca.gov

Assembly
California Legislature

MATT HANEY
ASSEMBLYMEMBER, SEVENTEENTH DISTRICT

DISTRICT OFFICE
455 GOLDEN GATE AVENUE, ROOM 14300
SAN FRANCISCO, CA 94102
(415) 557-3013
FAX (415) 557-3015

December 16, 2025

Rob Bonta, Attorney General of California
1300 "I" Street Sacramento, CA 95814
Attn: Bureau of Environmental Justice

Re: Request for Inquiry into San Francisco's Compliance with SB 1000 and Environmental Justice Protections

Dear Attorney General Bonta, I am writing to bring to your attention serious concerns raised by my constituents in Assembly District 17 regarding the City and County of San Francisco's adherence to state environmental justice laws, specifically Senate Bill 1000. My constituents have provided data-driven analysis suggesting that San Francisco's implementation of its Environmental Justice Framework may be insufficient to meet the state's requirements to reduce health risks in disadvantaged communities. Specifically, they point to a pattern where essential green infrastructure, specifically street trees, is being withheld from Environmental Justice Communities based on subjective criteria such as "survivability" or concerns about vandalism. This practice raises a critical question of whether these neighborhoods are effectively being treated as "containment zones" for environmental and social burdens. By citing existing challenges as a reason to deny new investment, the city risks perpetuating the very inequities that SB 1000 was designed to redress. The consequences of this neglect are stark. Hundreds of tree wells in District 17 sit empty, while federal and local funding explicitly designed for equity is systematically directed to other parts of the city. As a result, residents in these designated disadvantaged census tracts are forced to pay for street trees out-of-pocket, effectively subsidizing the city's failure to provide basic environmental health protections. Furthermore, constituents have documented that the city's Environmental Justice Framework explicitly disclaims being a binding policy document. If accurate, this would undermine the intent of SB 1000 to create enforceable, action-oriented policies. Given these concerns, I respectfully request that the Bureau of Environmental Justice review these claims to ensure that San Francisco is fully compliant with both the letter and the spirit of state environmental justice laws, and that all communities in my district receive the equitable protections they are owed.

STATE CAPITOL
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(916) 319-2017
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E-MAIL
Assemblymember.Haney@assembly.ca.gov

Assembly
California Legislature

MATT HANEY
ASSEMBLYMEMBER, SEVENTEENTH DISTRICT

DISTRICT OFFICE
455 GOLDEN GATE AVENUE, ROOM 14300
SAN FRANCISCO, CA 94102
(415) 557-3013
FAX (415) 557-3015

Thank you for your attention to this matter.

Sincerely,



Assemblymember Matt Haney
Assemblymember, 17th District

City and County
of San Francisco

Board of Supervisors
Member, District 6

MATT DORSEY
麥德誠

January 27, 2026

Ms. Angela Cavillo, Clerk of the Board of Supervisors
CITY AND COUNTY OF SAN FRANCISCO
City Hall, Room 244
1 Dr. Carlton B. Goodlett Place
San Francisco, Calif. 94102-4689

Emailed to: Angela.Cavillo@sfgov.org

Letter of Inquiry: Tree Canopy Equity and Resource Allocation in District 6

Dear Madam Clerk,

I submit this Letter of Inquiry (LOI) in accordance with the provisions of San Francisco City Charter § 16.114 governing the Board of Supervisors' power of inquiry and review, to request a response from the Department of Public Works.

I seek clarity regarding the City's implementation of its tree planting, replacement, and maintenance policies, particularly as they relate to South of Market and other neighborhoods in District 6 that have repeatedly been identified as priority geographies for urban forestry investment but continue to experience the lowest levels of tree canopy coverage in San Francisco.

Background

South of Market (SoMa) has long been recognized as an Environmental Justice Community and as one of San Francisco's most heat burdened, park poor, and environmentally overburdened neighborhoods. Multiple City adopted plans and voter approved funding measures identify SoMa as a priority area for tree planting to advance climate resilience, public health, and neighborhood livability.

Despite these stated priorities, a significant body of recent, constituent led research has documented persistent and widening disparities in tree canopy distribution and planting outcomes in SoMa and across District 6. This work is rigorous, data driven, and rooted in a clear commitment to partnership with the City. Importantly, it provides an opportunity for the City to review how its policies, funding frameworks, and operational practices support its stated equity goals, General Plan commitments, and legal obligations under state and local law.

Their research highlights that SoMa continues to have the lowest tree canopy coverage in the City, even as new funding sources intended to advance environmental justice and climate adaptation have been deployed elsewhere. It also documents the cumulative effects of administrative policies that result in empty tree wells, deferred replacements, and the loss of existing canopy in precisely the neighborhoods most in need of investment.

My intent in submitting this Letter of Inquiry is to better understand how decisions are being made, how equity frameworks are operationalized in practice, and how the City can course correct where outcomes do not match intent. I believe Public Works shares the goal of delivering environmental benefits fairly and transparently, and that clarity on these questions will help support that shared objective.

Requests for Information

To that end, I respectfully request written responses to the following questions.

1. **Environmental Justice Framework and General Plan Policies:** California Senate Bill (SB) 1000 requires that cities and counties adopt policies in their General Plan to address environmental justice[1]. In response, the Planning Commission adopted the Environmental Justice Framework in 2023 to establish a clear set of visions and priorities to advance health in communities of color and low-income communities. This was later codified by the Board of Supervisors via Ordinance No. 084-23[2].
    - **a.** How does the Department operationalize the San Francisco Environmental Justice Framework in tree planting and maintenance decisions, and does it use the City's Environmental Justice Burden Scores to guide or weight resource allocation?
    - **b.** Priority 1.3 of the Environmental Justice Framework calls for developing neighborhood specific targets for tree canopy cover. This echoes a recommendation the Budget and Legislative Analyst made in their 2021 Street Resurfacing Program and StreetTreeSF Program Performance Audit[3]. Do such targets exist for neighborhoods in District 6, including South of Market, South Beach, Mission Bay, and Treasure Island? If so, what are those targets? If not, what is the timeline for their creation?

2. **Funding Equity and Allocation**
    - **a.** In November 2022, San Francisco voters approved Proposition L, which replaced the prior half-cent transportation sales tax under Proposition K. Proposition L funds include support for the planting and establishment of street trees in the public right of way[4]. In November 2023, the San Francisco County Transportation Authority (SFCTA) announced a $1 million allocation to plant and establish 408 street trees, with weekly watering for three years during the establishment period and lifetime maintenance through Public Works' StreetTreeSF program. Program materials indicate that this investment was intended to prioritize Districts 5, 6, and 10 based on tree census data

[1] https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201520160SB1000

[2] https://sfgov.legistar.com/View.ashx?M=F&ID=12001161&GUID=CAFD5813-D06C-44FA-9947-D21B10104D18

[3] https://sfbos.org/sites/default/files/061421_PA_of_DPW_Street_Resurfacing_Prog_%26_StreetTreeSF%20Prog.pdf

[4] https://www.sfcta.org/sites/default/files/2023-04/2022_Expenditure_Plan_Clean.pdf

identifying areas with the lowest canopy coverage.[5]. Planning documents subsequently show that, "SFPW [San Francisco Public Works] preliminarily expect[ed] to focus on planting in District 10 based on tree census data, low canopy coverage, and geographic equity". Can the Department confirm the final locations where these 408 trees were planted and describe the specific criteria and decision-making process that resulted in the final planting strategy?

b. In December of last year, the San Francisco County Transportation Authority announced a $1.1 million allocation of transportation sales tax funds to support the San Francisco Public Works Tree Planting and Establishment Project, which will plant approximately 407 additional street trees. Planting locations were identified and prioritized based on tree census data showing low canopy coverage and heightened exposure to extreme heat and air pollution, as well as equity indicators including Equity Priority Communities and Environmental Justice Communities.[6] What specific framework, criteria, or scoring methodology did the Department use to translate these data inputs into district level planting decisions, and how did that analysis result in the selection of the final planting locations? Please confirm the final planting locations.

c. In September of 2023, San Francisco was awarded $12 million in federal grant funding to plant and maintain trees[7]. At the time of the announcement, then Mayor London Breed shared that this funding would "strengthen our urban canopy", particularly in neighborhoods like the South of Market, among others. To date, how has the South of Market neighborhood benefited from this funding, including the number and location of trees planted or maintained? Looking ahead, what portion of this funding is planned for investment in SoMa, and what is the anticipated timeline and scope of those future benefits?

d. Last year, San Francisco Clean City Coalition was awarded a sole source grant contract in an amount not to exceed $4,931,307.00 to, in part, plant up to 600

[5] https://www.sfcta.org/blogs/prop-l-transportation-sales-tax-investments-bart-fare-gates-tree-planting-vision-zero-and

[6] https://www.sfcta.org/blogs/transportation-sales-tax-funds-cable-cars-trees

[7] https://www.sf.gov/news--san-francisco-awarded-12-million-federal-grant-plant-thousands-new-street-trees-fight-climate

replacement trees and water 2,400 street trees[8]. How were neighborhoods prioritized for replacement planting and watering under this contract?

3. **Discretionary Guidelines**
   - **a.** In a document obtained by my constituents via Public Records Request #25-8453, a document titled "Deferral Criteria from FUF October 2023" appears to describe "criteria for evaluating a resident's tree planting concern and escalating it above the public good, resulting in Friends of the Urban Forest choosing to not plant a basin."[9] Mentioned in the document is an allowance for deferrals when "a shockout or empty basin is in close proximity to a temporary shelter for unhoused people." Is this deferral criterion an active policy or practice for the Department and/or Friends of the Urban Forest today? What is the origin and rationale for this policy? Do our nonprofit partners or grantees rely on or apply it when making tree planting decisions? Please also clarify whether this criterion has been formally adopted, how it is communicated to residents, and how its use is tracked and reviewed to ensure consistency with the City's equity and environmental justice goals.
   - **b.** Director's Order 187246, adopted in 2018, outlines how the planting, maintenance, or removal of trees and landscape material on public sidewalk areas are regulated. Section V outlines the requirements for new tree basin construction and dimension and specifies that "No street tree planting will be allowed in sidewalks with a width less than 7'-6". Exceptions may be granted on a case-by-case basis, as approved by Public Works"[10]. What are the specific criteria for granting an exception under Section V(B)(ii) and, what is the process for residents to apply for an exception? How many exceptions have been granted since the Order was signed in 2018?
   - **c.** My constituents have identified more than 130 empty tree wells on streets with a width less than 7'-6". For locations where an exception is not requested or approved per Director's Order 187246, what is Public Works' standard

[8] https://sfpublicworks.org/sites/default/files/Commissions/May%208%202025/Item_4d%20PWC%20-%20Tree%20Watering%20-%20StaffReport%20Resolution%20Attachments%205-8-25%20v55.pdf

[9] https://sanfrancisco.nextrequest.com/documents/55541864

[10] https://sfpublicworks.org/sites/default/files/187246_Public%20Works%20Director%27s%20Order%20on%20Tree%20Planting_0.pdf

approach to these empty planting sites? Is the default outcome to fill the basin with concrete, or are there alternative treatments or interim solutions available to preserve future planting opportunities?

d. Was an impact analysis conducted prior to the adoption of Director's Order 187246 to assess how many existing street trees or planting sites would become ineligible for replacement? If so, what were the findings of that analysis? If known, how many planting sites in District 6 were identified as ineligible for replanting following enactment of the Order?

4. Empty Tree Well Backlog

a. A document obtained by my constituents through Public Records Request No. 25-8280 indicates that Public Works was aware of more than 500 existing empty tree wells in the South of Market neighborhood[11]. Is this figure still accurate? If not, please provide the current number. What specific plan and timeline does the Department have to address and fill these empty tree wells?

b. My constituents have informed me that more than 900 empty tree well requests were closed by the Department on December 4 and 5, 2025, with the closure reason cited as "Planned Maintenance." Please elaborate on what this means and provide the specific capital project codes and funding sources assigned to these locations. If no funded project exists for these sites, please explain the rationale for removing these public reports from the active request queue.

c. Please provide the number of 311 requests for tree planting by district over the last 12 months. How many of these requests were approved, and what were the primary barriers to approval?

5. Deferred Tree Replacements and Legal Compliance

a. In January 2022, the Board of Supervisors adopted Ordinance 001 22, amending Public Works Code Article 16 Section 806(a)(6)(c) to require tree replacements within 120 days or inclusion on a Delayed Tree Replacement Report. Please provide the most recent Delayed Tree Replacement Report. If such a report does not exist, please explain.

b. How does the Department track the replacement of dead or removed trees?

[11] https://sanfrancisco.nextrequest.com/documents/55322029

6. **Public Works Code Article 16: Enforcement and Compliance**
    - **a.** Public Works Code Article 16 establishes permitting, replacement, and enforcement requirements for the planting and removal of street trees by parties other than the Department, including obligations tied to development projects. With that framework in mind, after completion of a qualifying development project, what processes does Public Works use to verify compliance with required street tree planting permits, including confirmation that permitted trees have been planted within the required timeframe and in accordance with approved species and locations?
    - **b.** If required trees cannot be planted as permitted due to infrastructure conflicts, site constraints, or other conditions, what is the Department's protocol for modifying permit requirements, approving alternative planting locations, or assessing in lieu fees, and what written findings are required to support such determinations?
    - **c.** Once trees are planted pursuant to a development related permit, how does Public Works ensure that those trees are maintained through establishment, including monitoring survival, enforcing replacement obligations if trees are stolen or fatally damaged, and determining when maintenance responsibility transfers to the Department?
    - **d.** Public Works Code Article 16 Section 808 prohibits the injury or destruction of street trees and requires approved tree protection measures during construction activities. With respect to these requirements, how does the Department monitor and enforce compliance with tree protection requirements throughout the lifecycle of a construction project, including during permitting, active construction, and project close-out?
    - **e.** When a violation of Section 808 occurs, how does the Department determine whether the injury or damage resulted from intentional, malicious, or grossly negligent conduct, and what penalties, replacement obligations, or corrective actions are assessed as a result?
    - **f.** How does the Department track violations, assess replacement costs, fines, and penalties associated with tree damage during construction, and does the Department maintain an accounting of these amounts by project or district? How are those funds used?

I appreciate the Department's continued engagement on these issues and look forward to your responses. My goal is to ensure that the City's policies, funding decisions, and operational practices are delivering on our shared commitments to environmental justice, climate resilience, and equitable public investment for the residents of South of Market and all of District 6.

Please do not hesitate to reach out to my office with any questions as you prepare your response.

Should you have questions or require more clarity, you may contact me or my Chief of Staff, Dominica Donovan, Dominica.Donovan@sfgov.org.

Sincerely,



MATT DORSEY

Cc: Carla Short, Director
San Francisco Public Works
Carla.Short@sfdpw.org

From:	Board of Supervisors (BOS)
To:	BOS-Supervisors; BOS-Legislative Aides
Cc:	Calvillo, Angela (BOS); Somera, Alisa (BOS); Ng, Wilson (BOS); De Asis, Edward (BOS); Mchugh, Eileen (BOS); BOS-Operations; BOS Legislation, (BOS); Carroll, John (BOS)
Subject:	6 Letters regarding File No. 251211
Date:	Friday, January 23, 2026 9:30:07 AM
Attachments:	6 Letters regarding File No. 251211.pdf

Hello,

Please see attached for 6 letters regarding File No. 251211.

> **File No. 251211:** Ordinance amending the Public Works Code to allow development projects to satisfy street tree planting requirements through payment of an in lieu fee or providing alternative landscaping; exempt accessory dwelling units from street tree planting requirements; eliminate appeals to the Board of Appeals for tree removals undertaken by City departments and commissions; and update in lieu fee reporting requirements; amending the Administrative Code to create a separate account within the Adopt-A-Tree Fund to receive in lieu fees for street tree requirements; amending the Planning Code to update street tree applicability requirements; affirming the Planning Department's determination under the California Environmental Quality Act; making findings of consistency with the General Plan, and the eight priority policies of Planning Code, Section 101.1; and making public necessity, convenience, and welfare findings under Planning Code, Section 302. (Mayor, Wong)

Sincerely,

Joe Adkins
Office of the Clerk of the Board
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
Phone: (415) 554-5184 | Fax: (415) 554-5163
board.of.supervisors@sfgov.org | www.sfbos.org

From: Michael Nulty
To: BoardofAppeals (PAB)
Cc: Ben.White@sfgov.org
Subject: Opposition to Proposed Legislation (File No. 251211)
Date: Sunday, January 11, 2026 8:02:35 PM
Attachments: File 251211 - Public Comment Ltrs.pdf

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

January 11, 2026

San Francisco Board of Appeals
City Hall, Room 416
1 Dr. Carlton B. Goodlett Place
San Francisco, CA 94102

Re: Opposition to Proposed Legislation (File No. 251211) – Elimination of Appeals for Street Tree Removals by City Departments and Commissions (Item 8: Special Item)

Dear San Francisco Board of Appeals Members,

As a long-time resident of District 6, citizen planner, and Executive Director of the Alliance for a Better District 6, I submit this opposition to the provisions in File No. 251211 that would eliminate the public's right to appeal City-initiated street tree removals to your Board. I have been actively involved in urban forestry advocacy for decades, including leading the Tenderloin Tree Campaign, which has fought to preserve and expand green spaces in our densest, most vulnerable neighborhoods.

San Francisco's urban tree canopy is critically low at approximately **13.7%** coverage (as measured by the amount of land covered by trees when viewed from above, per the San Francisco Planning Department's Urban Tree Canopy Analysis and confirmed in recent City reports). This figure places San Francisco among the smallest urban tree canopies among major U.S. cities and significantly below the national average of around 27%. Compared to other California cities, San Francisco fares poorly: for example, Los Angeles has a tree canopy cover of about 21%, while cities like Sacramento, San Diego, and parts of the Inland Empire have shown net gains in canopy coverage in recent years (2018–2022 data from the USDA Forest Service). California's statewide urban tree canopy averages around 19%, underscoring that San Francisco lags behind its peers in the state despite its dense urban environment and pressing climate challenges.
Street trees remain one of the few categories with meaningful protections, providing essential benefits including heat reduction for climate resilience, improved air quality and public health, stormwater management, and equity in dense areas like the Tenderloin, South of Market, and Mission Bay.
The proposed amendments allow developers to satisfy street tree planting requirements through:

- Planting trees,
- Paying an in-lieu fee (currently ~$2,590 per tree), or
- Providing "alternative landscaping" (undefined and explicitly excluding street trees).

While these options may seem flexible, they risk a net loss or stagnation of canopy growth. The in-lieu fee covers only planting and short-term watering (about three years), not full lifecycle costs. Developers are incentivized to pay fees rather than plant trees, and "alternative landscaping" offers no guarantee of canopy. No new dedicated funding addresses the operational challenges faced by Public Works and Friends of the Urban Forest (FUF), including staffing shortages, insufficient watering capacity, and the $19 million StreetTreeSF budget, which is legally restricted to maintaining existing trees and cannot fund new planting or watering.
Most critically, the legislation removes the public's right to appeal City-initiated tree removals to the Board of Appeals, making decisions final and non-appealable. This overlooks a vital point and does not address the actual delays. Board of Appeals data show that appeals related to tree removals constitute less than 2% of cases (with ~90% involving building/planning permits), so they are not a significant bottleneck in development.
Appeals have:

- Prevented or reduced mass tree removals,
- Increased replacement planting, and
- Exposed unlawful City actions (such as premature removals at UN Plaza).

Eliminating this process increases pressure to remove public trees without scrutiny, reduces public trust and participation, and heightens taxpayer liability for tree loss and climate impacts. It could worsen urban heat, flooding, and public health outcomes in already underserved areas—issues that are especially acute given San Francisco's disproportionately low canopy compared to other California cities.
Better alternatives exist now:

- Increase in-lieu fees to reflect actual planting and maintenance costs,
- Clearly define and require canopy-producing alternatives,
- Secure dedicated funding for new tree planting and watering,
- Maintain public appeal rights for City-initiated removals, and
- Strengthen coordination and capacity at Public Works and FUF.

San Francisco can support housing and development without sacrificing its urban forest, transparency, or climate resilience. These amendments weaken tree protections, reduce public oversight, and fail to address core operational challenges—particularly urgent in a city with one of the lowest tree canopies among central California and U.S. cities.
I thank you for your judicious work on these issues in the past and for the opportunity to submit this comment. I would like for the Board to oppose the elimination of appeals and authorize a letter to the Board of Supervisors and the Mayor recommending their removal or modification from File No. 251211.

I am available to talk about this more.

Sincerely,

Michael Nulty
Citizen Planner
Executive Director, Alliance for a Better District 6
San Francisco Tree Campaign Affiliate Member

Veterans Alley Mural Project, Inc. Member, Board of Directors at Veterans Alley

Co-Founder and Co-President at Central City Democrats

Founding member at San Francisco Community Land Trust

Member at Lower Polk Neighbors

Community Partner representative at Friends of Boeddeker Park

Planning Committee Member at District 6 Parks Planning Committee

Community Advocate at National Low Income Housing Coalition

Project Coordinator & Community Member & CBO Member at Tenderloin Futures Collaborative

Co-founder, Program Director at Tenant Associations Coalition of San Francisco

Former Community Leader at San Francisco Neighborhood Parks Council

Former The Central City Extra Editorial Board Member at San Francisco Study Center

Former Senior Housing Development Advisory Committee Member at St. Anthony Foundation

Former Co-Producer at Mi Casa No Es Su Casa

Former Renewal & Expansion Steering Committee Member at Mid Market Community Benefit District

Former Board of Directors Member-Resident Seat, Membership Chair at North of Market Planning Coalition, Inc.

PS. Just to let you know, I have included additional public comments regarding this proposed legislation below.

From:	Board of Supervisors (BOS)
To:	BOS-Supervisors; BOS-Legislative Aides
Cc:	Calvillo, Angela (BOS); Mchugh, Eileen (BOS); Ng, Wilson (BOS); Somera, Alisa (BOS); De Asis, Edward (BOS); BOS-Operations; Board of Supervisors (BOS); Carroll, John (BOS)
Subject:	File No. 251211 Street Trees - 27 letters
Date:	Thursday, January 8, 2026 12:32:53 PM
Attachments:	27 letters.pdf

Dear Supervisors,

Please see the attached 27 letters, from members of the public and various organizations, regarding:

> File No. 251211 - Ordinance amending the Public Works Code to allow development projects to satisfy street tree planting requirements through payment of an in lieu fee or providing alternative landscaping; exempt accessory dwelling units from street tree planting requirements; eliminate appeals to the Board of Appeals for tree removals undertaken by City departments and commissions; and update in lieu fee reporting requirements; amending the Administrative Code to create a separate account within the Adopt-A-Tree Fund to receive in lieu fees for street tree requirements; amending the Planning Code to update street tree applicability requirements; affirming the Planning Department's determination under the California Environmental Quality Act; making findings of consistency with the General Plan, and the eight priority policies of Planning Code, Section 101.1; and making public necessity, convenience, and welfare findings under Planning Code, Section 302.

Regards,

Richard Lagunte
Office of the Clerk of the Board
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
Voice (415) 554-5184 | Fax (415) 554-5163
bos@sfgov.org | www.sfbos.org

Pronouns: he, him, his

Disclosures: *Personal information that is provided in communications to the Board of Supervisors is subject to disclosure under the California Public Records Act and the San Francisco Sunshine Ordinance. Personal information provided will not be redacted. Members of the public are not required to provide personal identifying information when they communicate with the Board of Supervisors and its committees. All written or oral communications that members of the public submit to the Clerk's Office regarding pending legislation or hearings will be made available to all members of the public for inspection and copying. The Clerk's Office does not redact any information from these submissions. This means that personal information—including names, phone numbers, addresses and similar information that a member of the public elects to submit to the Board and its committees—may appear on the Board of Supervisors' website or in other public documents that members of the public may inspect or copy.*

From:	Shaun Aukland
To:	CPC-Commissions Secretary; Carroll, John (BOS); Dennis Phillips, Sarah (CPC)
Cc:	Ionin, Jonas (CPC); Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS)
Subject:	Opposition & CEQA Objection: File No. 251211 (Street Tree Ordinance)
Date:	Monday, January 5, 2026 12:34:38 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear President So, Chair Melgar, Supervisors, and Commissioners,

I am writing on behalf of FairTrees.org to formally oppose File No. 251211 and to object to the Planning Department's CEQA determination. Please also add this to the legislative file.

1. CEQA Objection. The legislative file states this ordinance is "Not defined as a project... because it would not result in a direct or indirect physical change in the environment." We dispute this finding. The legislation eliminates the public's right to appeal city-initiated tree removals. Historical data proves that the appeals process has successfully preserved hundreds of mature trees that the City intended to remove (e.g., Mission Verde, 24th St).

If the appeals process prevents tree removal, then removing the appeals process will logically result in the destruction of trees that otherwise would have been saved.

This will have an obvious impact to the city's physical environment. A reduction in urban canopy is a physical change to the environment that increases heat islands and reduces air quality. This requires environmental review, not an exemption. As our orgainzation has communicated before, Enivornment Justice Communities like SOMA, the Tenderloin, Bayview Hunter's Point, and others are largely *losing* canopy, not gaining it. Ongoing projects like the Folsom / Howard Streetscape projects that have removed dozens of trees, and only added marginally.

2. The "Equity" Justification is Not Defined. The "In-Lieu Fee" Loophole The bill allows developers to pay fees to plant trees in "neighborhoods with low canopy" but fails to define that term. Without a data-driven definition (like "Equity Priority Communities"), this creates a slush fund where fees generated in high-need districts like SoMa (2.7% canopy) can be diverted to wealthier areas. We have seen this **over and over**, with the federal Inflation Reduction Act grant, as well as Prop L funds. Our organization has been analyzing canopy data from US Forestry, and can provide this to make this a more data-driven process.

3. SF Citizens Lose Their Last Remaining Voice in Trees: Stripping residents of the right to appeal City decisions removes the only check and balance against administrative overreach, and eliminates due process.. This is not streamlining; it is silencing.

We urge you to CONTINUE this item until the CEQA determination is corrected and these amendments are made.

Sincerely,

Shaun Aukland
FairTrees.org

From:	Ruby Rieke
To:	Carroll, John (BOS); Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS)
Subject:	Public Comment - File No. 251211 - Opposition to Appeals Ban
Date:	Tuesday, January 6, 2026 3:30:11 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Chair Melgar and Members of the Land Use Committee,

Please add these comments to the official legislative file for **File No. 251211**.

I am writing to **OPPOSE** the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining"; it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.

Furthermore, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

Please **CONTINUE** this item until these democratic and equitable protections are restored.

Sincerely, Ruby Rieke Mission District

From:	Shamika Klassen
To:	Carroll, John (BOS); Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS)
Subject:	Public Comment - File No. 251211 - Opposition to Appeals Ban
Date:	Tuesday, January 6, 2026 3:31:18 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Chair Melgar and Members of the Land Use Committee,

Please add these comments to the official legislative file for **File No. 251211**.

I am writing to **OPPOSE** the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining"; it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.

Furthermore, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

Please **CONTINUE** this item until these democratic and equitable protections are restored.

Sincerely,

Dr. Shamika Klassen, Alamo Square Neighborhood

From:	Christine S.
To:	Carroll, John (BOS); Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS); DorseyStaff (BOS)
Subject:	Public Comment - File No. 251211 - Opposition to Appeals Ban
Date:	Tuesday, January 6, 2026 3:56:14 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Chair Melgar and Members of the Land Use Committee,

Please add these comments to the official legislative file for **File No. 251211**.

I am writing to **OPPOSE** the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining"; it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction. The City of San Francisco needs to be adding more trees to beautify the sad streets in SF. I've been trying for 5 years just to get one tree planted after a car crashed into the gorgeous healthy ficus that adorned my street in SOMA. This is shameful. A missed opportunity to have a city that deserves to showoff its natural beauty.

Furthermore, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

Please **CONTINUE** this item until these democratic and equitable protections are restored.

Sincerely,

Christine Segalas
District 6 (SOMA)

From:	Anna Papitto
To:	Carroll, John (BOS); Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS)
Subject:	Public Comment - File No. 251211 - Opposition to Appeals Ban
Date:	Tuesday, January 6, 2026 4:06:36 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Chair Melgar and Members of the Land Use Committee,

Please add these comments to the official legislative file for **File No. 251211**.

I am writing to **OPPOSE** the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining"; it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.

Furthermore, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

Please **CONTINUE** this item until these democratic and equitable protections are restored.

Sincerely, Anna Papitto, Noe Valley

From:	Alice Rogers
To:	Carroll, John (BOS); Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS)
Subject:	Public Comment - File No. 251211 - Opposition to Appeals Ban
Date:	Tuesday, January 6, 2026 4:21:09 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Chair Melgar and Members of the Land Use Committee,

Please add these comments to the official legislative file for **File No. 251211**.

As a decades-long tree advocate and FUF member, I am writing to **OPPOSE** the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining"; it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.

Additionally, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

Please **CONTINUE** this item until these democratic and equitable protections are restored. We need to get this right.

Respectfully,

Alice Rogers

.....

Alice Rogers
10 South Park St
Studio 2
San Francisco, CA 94107

arcomnsf@pacbell.net

From:	Abigail Kroch
To:	Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS); Carroll, John (BOS)
Subject:	Public Comment - File No. 251211 - Opposition to Appeals Ban
Date:	Tuesday, January 6, 2026 4:35:50 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

- Dear Chair Melgar and Members of the Land Use Committee,

  Please add these comments to the official legislative file for **File No. 251211**.

  I am writing to **OPPOSE** the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining"; it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.

  Furthermore, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

  Please **CONTINUE** this item until these democratic and equitable protections are restored.

  Sincerely,

  Abigail Kroch, SoMa resident

From:	Shalmali Bane
To:	Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS); Carroll, John (BOS)
Subject:	Public Comment - File No. 251211 - Opposition to Appeals Ban
Date:	Tuesday, January 6, 2026 4:51:13 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Chair Melgar and Members of the Land Use Committee,

Please add these comments to the official legislative file for **File No. 251211**.

I am writing to **OPPOSE** the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining"; it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.

Furthermore, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

Please **CONTINUE** this item until these democratic and equitable protections are restored.

Sincerely,

Shalmali Bane, SOMA west neighborhood

From:	Collin Tharp
To:	Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS); Carroll, John (BOS)
Subject:	Public Comment - File No. 251211 - Opposition to Appeals Ban
Date:	Tuesday, January 6, 2026 5:20:42 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Chair Melgar and Members of the Land Use Committee,

Please add these comments to the official legislative file for **File No. 251211**.

I am writing to **OPPOSE** the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining"; it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.

Furthermore, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

Please **CONTINUE** this item until these democratic and equitable protections are restored.

Sincerely,

Collin Tharp

Potrero Hill

From:	Barklee Sanders
To:	Carroll, John (BOS); Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS)
Cc:	contact@fairtrees.org; Shaun Aukland
Subject:	Re: Action Alert: Next Monday, City Hall is voting to strip your tree appeal rights
Date:	Tuesday, January 6, 2026 6:14:01 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Public Records Request under the California Public Records Act (Gov. Code § 7920.000 et seq.) and San Francisco Sunshine Ordinance (Admin. Code Ch. 67) concerning **File No. 251211 ("PermitSF" legislation)**, any amendments affecting **Public Works Code Article 16 (Urban Forestry Ordinance)**, and **City-initiated tree removal appeal rights and "low-canopy" in-lieu fees**.

Pursuant to CPRA and the Sunshine Ordinance, please produce the following records **from January 1, 2024 to present** (or earlier if needed for completeness). I request **electronic copies** (native format where available) and **rolling production** as records are located. If any portion is withheld, please provide a **Vaughn-style index** stating the specific exemption and how it applies.

A. Legislation & Redlines (File No. 251211):

1. All drafts, redlines, margin notes, and working copies of File No. 251211 and any trailer/companion ordinances that amend **Public Works Code Article 16** or address **appeals of City-initiated tree removals** or "final and non-appealable" language.

2. All committee packets, staff reports, fiscal/equity analyses, and "legislative digest" language; including any version posted to or prepared for the **Land Use & Transportation Committee** (meeting agendas and packets).

3. Any **CEQA** memos/determinations related to the ordinance(s) and whether changes to tree-removal appeal rights were assessed as a project impact.

B. Policy Basis for Appeal Changes:
4) Internal/external correspondence (including emails, texts, Slack/Teams messages) among **Mayor's Office, Clerk/BOS, Public Works/BUF, Planning, City Attorney, Board of Appeals, and Department of the Environment** discussing:

- proposals to eliminate or limit public appeals of **City-initiated** tree removals;

- the phrase "**final and non-appealable**" (or similar);

- jurisdiction of the **Board of Appeals** over tree-removal orders;

- comparisons to current practice noted on DPW/BUF pages (notice/hearing/appeal). Please include attachments and calendar invites. Suggested search terms: **"251211" "PermitSF" "Article 16" "tree removal" "appeal" "non-appealable" "BUF" "Board of Appeals" "low canopy" "in-lieu" "fee" "equity" "Posting 30 days."**

C. "Low-Canopy" In-Lieu Fee Targeting:
5) Any definitions, maps, methodologies, or datasets used to define "**low-canopy neighborhoods**," including draft criteria, environmental burden indexes, CalEnviroScreen overlays, and proposed fund allocation rules.
6) Communications with developers, BIDs, or advocacy groups regarding in-lieu fee substitutions for on-site planting and fund deployment in "low-canopy" areas.

D. Impact & Historical Records:
7) Annual counts (CSV/spreadsheet) for **2018-present**: tree-removal permits initiated by **City departments**, objections received, hearings held, Director decisions, and **appeals filed and outcomes** (including to the **Board of Appeals**). Include any datasets that back Public Works web statements about objections, hearings, and appealability.
8) Records relating to the **Calle 24 / 24th Street ficus** proceedings (BUF recommendations, posted notices, appeals, Board of Appeals actions, and final conditions), used as precedent in policy discussions.

E. Public Notice & Meeting Compliance:
9) Proof of noticing, agenda postings, and public comment instructions for any meetings where the appeal-rights change was discussed (committee and full Board).
10) Any Sunshine/Brown Act compliance reviews or guidance from the **City Attorney** regarding public participation on this subject.

Format, Fees, Timelines:
I request **fee waiver**/no-cost electronic production (CPRA § 7922.530), **rolling releases**, and confirmation within **10 days** (and any extension basis) as required by law. For any redactions/withholdings, identify the **specific code section** and explain how it applies. If records are available on public sites, please provide **direct URLs**.

Departments/Offices to Search:
Clerk of the Board/BOS (including Land Use & Transportation Committee), **Public Works – Bureau of Urban Forestry**, **Board of Appeals**, **Planning Department**, **City Attorney (Supervisor of Records)**, **Department of the Environment**, and **Mayor's Office**.

Barklee Sanders
Technology Consultant
More about me: barkleesanders.com
Schedule a meeting: https://cal.com/barkleesanders

On Tue, Jan 6, 2026 at 6:26 PM Shaun Aukland <shaun.aukland@gmail.com> wrote:



Hi everyone,

I am writing with an urgent warning. While we have been fighting for *more* trees, the City has quietly fast-tracked legislation that would strip your right to protect the *existing* ones. On **Monday, Jan 12th**, the Land Use Committee will vote on **File No. 251211**.

Buried in Lurie's new "streamlining" bill is a provision that **eliminates the public's right to appeal** tree removals initiated by City departments.

Why care? Currently, if Public Works or another agency wants to cut down mature trees on your block, you have the legal right to file an appeal and force a public hearing. Importantly, the process **works.** It is how residents saved nearly 40 mature trees in the Mission's **Calle 24** district when the City wanted to clear-cut them.

However, under the new law, that right vanishes. The Director's decision to cut would be "final and non-appealable."

This is not "streamlining." It is silencing. The City is effectively saying that it does not trust its citizens to have a voice in the design of their own neighborhoods.

We are also concerned about an "equity loophole": The bill allows developers to pay a fee instead of planting new trees. The fee goes to plant trees in "low canopy neighborhoods" but **leaves this undefined.** As this group knows well, without a strict definition, funds get assigned with little regard for actual canopy cover of environmental burden scores.

Two Fast Ways To Help:

We need to register opposition to these clauses.

Step 1: Copy and Paste this Email. This ensures your opposition is placed in the official file for every Supervisor to see. You may modify it your message to be more personal, if desired.

- **To:** John.Carroll@sfgov.org, Board.of.Supervisors@sfgov.org, Myrna.Melgar@sfgov.org, Bilal.Mahmood@sfgov.org, Chyanne.Chen@sfgov.org
- **Subject:** Public Comment - File No. 251211 - Opposition to Appeals Ban

  Dear Chair Melgar and Members of the Land Use Committee,

  Please add these comments to the official legislative file for **File No. 251211**.

  I am writing to **OPPOSE** the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining"; it is a removal of critical oversight that has

> historically saved mature trees from unnecessary destruction.
>
> Furthermore, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.
>
> Please **CONTINUE** this item until these democratic and equitable protections are restored.
>
> Sincerely, [Your Name] [Your Neighborhood]

Step 2: Sign the Petition -- Join over 500 neighbors in demanding the Board reject this ban on appeals.

It seems Mayor Lurie and Supervisor Wong want to make it easier to cut trees, even as our city's canopy declines, without an equity plan. Together, we can push back on this.

Best,

Shaun Aukland
FairTrees.org

--

You are receiving this email as a community partner or petition signer at FairTrees.org.
If you would like to unsubscribe from future updates, you can do so here.

From:	Josh Jagerman
To:	Carroll, John (BOS); Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS)
Subject:	Public Comment - File No. 251211 - Opposition to Appeals Ban
Date:	Tuesday, January 6, 2026 6:21:27 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Chair Melgar and Members of the Land Use Committee,

Please add these comments to the official legislative file for **File No. 251211**.

I am writing to **OPPOSE** the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining"; it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.

Furthermore, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

Please **CONTINUE** this item until these democratic and equitable protections are restored.

Sincerely,

Josh Jagerman

From:	Rebecca Hardy
To:	Carroll, John (BOS); Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS)
Subject:	Public Comment - File No. 251211 - Opposition to Appeals Ban
Date:	Tuesday, January 6, 2026 6:54:22 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Chair Melgar and Members of the Land Use Committee,

Please add these comments to the official legislative file for **File No. 251211**.

I am writing to **OPPOSE** the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining;" it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.

Furthermore, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

Please **CONTINUE** this item until these democratic and equitable protections are restored.

Sincerely,

Rebecca Hardy, Potrero Hill

From:	Amanda Rodriguez
To:	Carroll, John (BOS); Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS)
Subject:	Public Comment - File No. 251211 - Opposition to Appeals Ban
Date:	Tuesday, January 6, 2026 6:57:16 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Chair Melgar and Members of the Land Use Committee,

Please add these comments to the official legislative file for **File No. 251211**.

I am writing to **OPPOSE** the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining"; it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.

Furthermore, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

Please **CONTINUE** this item until these democratic and equitable protections are restored.

Sincerely,

Amanda Rodriguez

Glen Park resident

From:	Laurel Myers
To:	Carroll, John (BOS); Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS)
Subject:	Public Comment - File No. 251211 - Opposition to Appeals Ban
Date:	Tuesday, January 6, 2026 7:46:27 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Chair Melgar and Members of the Land Use Committee,

Please add these comments to the official legislative file for **File No. 251211**.

I am writing to **OPPOSE** the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining"; it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.

Furthermore, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

Please **CONTINUE** this item until these democratic and equitable protections are restored.

Sincerely,

Laurel Myers, SoMA resident

From:	Andrea Biltagi
To:	Carroll, John (BOS); Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS)
Subject:	Public Comment - File No. 251211 - Opposition to Appeals Ban
Date:	Tuesday, January 6, 2026 8:00:01 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Chair Melgar and Members of the Land Use Committee,

Please add these comments to the official legislative file for **File No. 251211**.

I am writing to **OPPOSE** the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining"; it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.

Furthermore, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

Please **CONTINUE** this item until these democratic and equitable protections are restored.

Sincerely,

Andrea Biltagi

Tenderloin, 94102

From:	Frank Lorch
To:	Carroll, John (BOS); Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS)
Subject:	Public Comment - File No. 251211 - Opposition to Appeals Ban
Date:	Tuesday, January 6, 2026 8:34:59 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Chair Melgar and Members of the Land Use Committee,

Please add these comments to the official legislative file for **File No. 251211**.

I am writing to **OPPOSE** the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining"; it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.

Furthermore, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

Please **CONTINUE** this item until these democratic and equitable protections are restored.

Sincerely,
Frank Lorch
Sunset

From:	Mc Mc 1
To:	Carroll, John (BOS); Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS)
Subject:	legislative File No. 251211. OPPOSE eliminating public appeal for tree removal
Date:	Tuesday, January 6, 2026 11:05:42 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Chair Melgar and Members of the Land Use Committee,
Please add these comments to the official legislative file for **File No. 251211**.
I am writing to **OPPOSE** the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining"; it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.
Furthermore, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.
Please **CONTINUE** this item until these democratic and equitable protections are restored.
Sincerely,
Mary McFadden
Anza VIsta

From:	Nikhil Gowda
To:	Carroll, John (BOS); Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS)
Subject:	Public Comment - File No. 251211 - Opposition to Appeals Ban
Date:	Wednesday, January 7, 2026 8:48:55 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Chair Melgar and Members of the Land Use Committee,

Please add these comments to the official legislative file for **File No. 251211**.

I am writing to **OPPOSE** the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining"; it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.

Furthermore, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

Please **CONTINUE** this item until these democratic and equitable protections are restored.

Sincerely,

Nikhil Gowda

West SoMa resident and home owner.

From:	Barbara Bagot-López
To:	Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS)
Cc:	FielderStaff; Carroll, John (BOS); Board of Supervisors (BOS)
Subject:	Public Comment - File No. 251211 - Opposition to Appeals Ban
Date:	Wednesday, January 7, 2026 10:29:20 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Hello, Chair Melgar & members of the Land Use Committee.

Please add my comments to the official legislative file for **File No. 251211**.

I OPPOSE the elimination of the public right to appeal city-initiated tree removals. Removing due process--removing the voice of SF residents--is not "streamlining"; it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.

In addition, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

Please CONTINUE this item until these democratic and equitable protections are restored.

Sincerely,
Barbara Bagot-López
Resident of Bernal Heights and San Francisco for 49 years who appreciates street trees

From:	Loren Craig Harrington
To:	Carroll, John (BOS); Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS)
Subject:	Public Comment - File No. 251211 - Opposition to Appeals Ban
Date:	Wednesday, January 7, 2026 1:18:40 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Chair Melgar and Members of the Land Use Committee,

Please add these comments to the official legislative file for File No. 251211.

I am writing to OPPOSE the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining"; it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.

Furthermore, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

Please CONTINUE this item until these democratic and equitable protections are restored.

Sincerely,

Craig Harrington
Twin Peaks SF

From:	David Singer
To:	Carroll, John (BOS); Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS)
Subject:	Public Comment - File No. 251211 - Opposition to Appeals Ban
Date:	Wednesday, January 7, 2026 4:30:50 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Chair Melgar and Members of the Land Use Committee,

I am writing to OPPOSE the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Though I appreciate that streamlining is needed, this goes too far, especially in the light of history where the city has failed to plant and maintain trees unless prompted. If the DPW and were doing a fabulous job, perhaps lacking an appeal wouldn't matter, but they have not been, and so it does, a lot.

I'd like the legislation amended to define "low tree canopy" neighborhoods with a strict data-driven methodology that includes canopy cover and environmental burden scores.
Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

Please CONTINUE this item until these democratic and equitable protections are restored.

Please add these comments to the official legislative file for File No. 251211.

Thank you, David Singer, SOMA

From: Tisay Baclay
To: Melgar, Myrna (BOS)
Cc: Chen, Chyanne (BOS); Carroll, John (BOS); Mahmood, Bilal (BOS); Board of Supervisors (BOS)
Subject: Subject: Public Comment – File No. 251211 – Opposition to Appeals Ban
Date: Wednesday, January 7, 2026 4:44:04 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Subject: Public Comment – File No. 251211 – Opposition to Appeals Ban

Dear Chair Melgar and Members of the Land Use Committee,

Please add these comments to the official legislative file for **File No. 251211**.

I am writing to **strongly OPPOSE** the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. While framed as administrative "streamlining," this provision fundamentally strips communities of their right to be heard and removes meaningful oversight over decisions that directly affect neighborhood health, environmental equity, climate resilience, and quality of life.

Under current law, when Public Works or another City agency seeks to remove mature trees, residents have the legal right to file an appeal and trigger a public hearing. This process is not theoretical - it works. File No. 251211 would eliminate this safeguard entirely.

The right to public participation and due process is not optional. It is protected under the **First and Fourteenth Amendments of the U.S. Constitution**, including the rights to free speech, to petition the government for redress of grievances, and to due process under the law. Fast-tracking legislation that removes appeal rights, especially when initiated by City departments themselves, raises serious constitutional concerns and undermines democratic governance. San Francisco must not become a city where community voices are treated as impediments rather than essential partners.

San Francisco has long been recognized as a leader in **environmental protection, climate justice, and civic engagement**. At a moment when residents are already absorbing sweeping budget cuts across healthcare, social services, outreach, housing stabilization, and environmental programs, this legislation further erodes trust and participation. The question before us is not whether the City can move

faster, but whether it can do so **without abandoning its values**.

Across the city, residents have stepped up beyond expectations - working in partnership with community-based nonprofits, organizing neighbors, and serving as frontline responders to the consequences of disinvestment. We are the ones operating at ground zero, engaging directly with impacted communities and protecting neighborhood-level environmental health. Removing public oversight ignores this lived experience and weakens outcomes.

I am also deeply concerned about an **equity loophole** in the legislation. While the bill allows developers to pay an In-Lieu Fee in place of planting trees, it fails to clearly define “low tree canopy” neighborhoods. Without a strict, data-driven definition that includes **canopy cover metrics and environmental burden scores**, these funds risk being allocated without regard to actual environmental need, undermining the very equity goals the policy claims to advance.

For these reasons, I respectfully request that the Committee **CONTINUE this item** until public appeal rights, constitutional protections, and clear environmental equity safeguards are fully restored.

Sincerely,
Teresa Dulalas
Resident - SoMa Pilipinas Filipino Cultural Heritage District 6

From:	Claudia Stern
To:	Carroll, John (BOS); Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS)
Cc:	Shaun Aukland
Subject:	Public Comment - File No. 251211 - Opposition to Appeals Ban
Date:	Thursday, January 8, 2026 5:55:13 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Chair Melgar and Members of the Land Use Committee,

Please add these comments to the official legislative file for **File No. 251211**.

I have lived and voted in San Francisco since 1985. As a retiree, I now volunteer in the garden (Sutro Park) near my house. I am lucky to have an increasing number of trees on the streets near my home thanks to the Friends of the Urban Forest. These trees reduce heat and noise, provide water absorption during rainy periods, and provide habitat for living creatures. We need more trees to make SF an even better city.

I am writing to **OPPOSE** the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining"; it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.

Furthermore, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

Please **CONTINUE** this item until these democratic and equitable protections are restored.

Sincerely,
Claudia Stern
714 44th Avenue
415 318 6461

Disclaimer

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more Click Here.

From: Steve Ensminger
To: Carroll, John (BOS); Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS)
Subject: Public Comment - File No. 251211 - Opposition to Appeals Ban
Date: Thursday, January 8, 2026 10:11:20 AM

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Dear Chair Melgar and Members of the Land Use Committee,

Please add these comments to the official legislative file for **File No. 251211**.

I am writing to **OPPOSE** the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining"; it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.

Furthermore, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

Please **CONTINUE** this item until these democratic and equitable protections are restored.

Sincerely, [Your Name] [Your Neighborhood]

From:	Theatre District Neighbors
To:	Carroll, John (BOS)
Cc:	Melgar, Myrna (BOS); Chen, Chyanne (BOS); Mahmood, Bilal (BOS)
Subject:	Opposition for File No. 251211 tree legislation
Date:	Thursday, January 8, 2026 10:21:22 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Chair Melgar and Land Use Committee Members,

Please add these comments to the official legislative file for File No. 251211.

We need more trees to make SF an even better city.

Theatre District Neighbors is writing to OPPOSE the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining"; it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.

Furthermore, We request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

Please CONTINUE this item until these democratic and equitable protections are restored.

Sincerely,
--

Theatre District Neighbors

P.O. Box 420846

San Francisco, CA 94142-0846

theatredistrictneighbors@gmail.com

(415) 339-8779

https://atasf7.wixsite.com/tdneighbors

From: dweller SF
To: Melgar, Myrna (BOS); Chen, Chyanne (BOS); Mahmood, Bilal (BOS)
Cc: Carroll, John (BOS)
Subject: reject File No. 251211 trees
Date: Thursday, January 8, 2026 11:20:21 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

94105 Resident (Rincon Hill / South Beach / SoMa)
Strong Opposition to Proposed Amendments in File No. 251211
(Urban Forestry PROPOSED Ordinance Changes)
January 8, 2026

Dear Members of the San Francisco Board of Supervisors,

As a resident of **ZIP code 94105** in the Rincon Hill, South Beach, and South of Market (SoMa) area—one of San Francisco's fastest-growing neighborhoods dominated by high-rises and with **critically low tree canopy coverage of approximately 4-5%** (far below the citywide average of 13.7%), including areas like South Beach and parts of SoMa with very little tree cover—I and my family are **vehemently oppose** the proposed amendments in File No. 251211. Our concrete-heavy streets already create severe urban heat islands, poor air quality, and extreme vulnerability to wildfire smoke and heat waves. These changes would exacerbate environmental inequities by letting developers skip on-site tree planting in the very places experiencing intense new development.

Key Reasons for Opposition:

1. **Devastating Blow to Greening in High-Density, Low-Canopy Areas Like 94105**
   South Beach, Rincon Hill, and SoMa have some of the lowest street tree canopy in the city—around 4.1% in parts of SoMa—with vast stretches of pavement and towering buildings offering little shade. These areas are priority zones for the **$12 million federal Inflation Reduction Act grant** targeting low-canopy, heat-vulnerable neighborhoods including SoMa to plant **3,500 new street trees**. Allowing developers to pay in-lieu fees instead of planting on-site—or exempting ADUs—would undermine this critical effort, leaving new luxury high-rises without greenery and denying residents immediate cooling and cleaner air amid booming development.
2. **Undermining Our Primary Source of New Trees Amid Severe Budget Crises**
   With the City's historic budget deficits—closing an **$800+ million shortfall in FY 2025-26** and facing projections up to **$1 billion** in coming years—Public Works' Urban Forestry programs are chronically underfunded, relying heavily on grants and external sources. **Mandatory tree planting from new development has become the main reliable way San Francisco adds street trees**. Expanding in-lieu fees and exemptions would sever this vital pipeline, stalling greening in fast-developing areas

like mine where every tree is essential.

3. **Exacerbating Life-Threatening Health and Climate Risks**
   Low tree canopy in 94105 leads to temperatures 10–20°F higher than greener neighborhoods, worsened air quality from traffic and freeways, and severe impacts from California's wildfires and droughts—we endured weeks of hazardous orange skies and smoke in 2020. Residents face elevated risks of heat-related illness and respiratory problems. Eliminating appeals for City tree removals erodes oversight, while online-only notices exclude many.
4. **Betraying City Promises and Contradicting Protective Policies Elsewhere**
   These developer-friendly changes prioritize short-term efficiency over accountability, unlike robust appeal processes in cities such as Beverly Hills, Pacifica, Los Altos, Mountain View, Santa Cruz, Saratoga, San Luis Obispo, Santa Monica, and Pasadena. They undermine the Urban Forest Plan, federal Justice40 commitments, and environmental goals—while areas like 94105 suffer from unchecked concrete expansion.

We cannot afford more barren streets in our skyline-dominated neighborhood. My family demands you **reject File No. 251211 entirely** and strengthen mandates for on-site planting and public appeals to deliver real trees where new development is transforming our community.

Regards,

The Fong Family

94105 Resident & Native San Franciscan
Rincon Hill / South Beach / SoMa, San Francisco, CA

From: dweller SF
To: Melgar, Myrna (BOS); Chen, Chyanne (BOS); Mahmood, Bilal (BOS)
Cc: Carroll, John (BOS)
Subject: reject File No. 251211 trees
Date: Thursday, January 8, 2026 11:20:19 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

94105 Resident (Rincon Hill / South Beach / SoMa)
Strong Opposition to Proposed Amendments in File No. 251211
(Urban Forestry PROPOSED Ordinance Changes)
January 8, 2026

Dear Members of the San Francisco Board of Supervisors,

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Key Reasons for Opposition:

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like mine where every tree is essential.

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4. **Betraying City Promises and Contradicting Protective Policies Elsewhere**
   These developer-friendly changes prioritize short-term efficiency over accountability, unlike robust appeal processes in cities such as Beverly Hills, Pacifica, Los Altos, Mountain View, Santa Cruz, Saratoga, San Luis Obispo, Santa Monica, and Pasadena. They undermine the Urban Forest Plan, federal Justice40 commitments, and environmental goals—while areas like 94105 suffer from unchecked concrete expansion.

We cannot afford more barren streets in our skyline-dominated neighborhood. My family demands you **reject File No. 251211 entirely** and strengthen mandates for on-site planting and public appeals to deliver real trees where new development is transforming our community.

Regards,

The Fong Family

94105 Resident & Native San Franciscan
Rincon Hill / South Beach / SoMa, San Francisco, CA

From:	SusanW
To:	Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Carroll, John (BOS); Board of Supervisors (BOS)
Subject:	Tree removal
Date:	Thursday, January 8, 2026 10:55:50 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Chair Melgar and Members of the Land Use Committee,

Please add these comments to the official legislative file for **File No. 251211**.

I am writing to **OPPOSE** the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining"; it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.

Furthermore, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

Please **CONTINUE** this item until these democratic and equitable protections are restored.

Sincerely,

Susan Weisberg

From:	Theatre District Neighbors
To:	Carroll, John (BOS)
Cc:	Melgar, Myrna (BOS); Chen, Chyanne (BOS); Mahmood, Bilal (BOS)
Subject:	Opposition for File No. 251211 tree legislation
Date:	Thursday, January 8, 2026 10:21:24 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Chair Melgar and Land Use Committee Members,

Please add these comments to the official legislative file for File No. 251211.

We need more trees to make SF an even better city.

Theatre District Neighbors is writing to OPPOSE the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining"; it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.

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Please CONTINUE this item until these democratic and equitable protections are restored.

Sincerely,
--

Theatre District Neighbors

P.O. Box 420846

San Francisco, CA 94142-0846

theatredistrictneighbors@gmail.com

(415) 339-8779

https://atasf7.wixsite.com/tdneighbors

From: Steve Ensminger
To: Carroll, John (BOS); Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS)
Subject: Public Comment - File No. 251211 - Opposition to Appeals Ban
Date: Thursday, January 8, 2026 10:11:31 AM

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Sincerely, [Your Name] [Your Neighborhood]

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Cc:	Melgar, Myrna (BOS); Chen, Chyanne (BOS); Mahmood, Bilal (BOS)
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Please **CONTINUE** this item until these democratic and equitable protections are restored.

Sincerely, [Your Name] [Your Neighborhood]

From: Joshua Klipp via ActionNetwork.org
To: Carroll, John (BOS)
Subject: San Francisco Board of Supervisors, Protect San Francisco Trees!
Date: Thursday, January 8, 2026 9:16:20 AM
Attachments: protect-san-francisco-trees_signatures_202601080515.pdf

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

San Francisco Board of Supervisors,

583 people have signed a petition on Action Network telling you to Protect San Francisco Trees!.

Here is the petition they signed:

> Mayor Lurie and Supervisor Wong's proposals for San Francisco's street trees are disastrous. We already have the smallest urban canopy of any major city in the U.S., and our failure to invest in our City trees has allowed even this small tree canopy to decline. We ask you to not allow Developers to have the choice of planting trees or paying an inadequate fee. This will lead to even fewer trees on City streets.
>
> And we ask you not to eliminate the public's right to appeal City-initiated tree removals. These appeals, for City projects, have nothing to do with expediting development. Additionally, these appeals have lead to innovative results, such as Mission Verde - one of the most innovative City/Community partnerships that resulted in 3x more trees being planted along the Mission District's cultural corridor. Eliminating this right to appeal will result in City projects removing trees en masse without oversight, and will incentivize private developers to persuade the City to remove trees on the taxpayer dime.
>
> Please, reject File #251211 amending San Francisco's Public Works Code Article 16.

You can view each petition signer and the comments they left you in the attached PDF.

Thank you,

Joshua Klipp

Sent via Action Network, a free online toolset anyone can use to

Action Network

organize. Click here to sign up and get started building an email list and creating online actions today.

Action Network is an open platform that empowers individuals and groups to organize for progressive causes. We encourage responsible activism, and do not support using the platform to take unlawful or other improper action. We do not control or endorse the conduct of users and make no representations of any kind about them.

You can unsubscribe or update your email address or change your name and address by changing your subscription preferences here.

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>
> Please, reject File #251211 amending San Francisco's Public Works Code Article 16.

You can view each petition signer and the comments they left you below.

Thank you,

Joshua Klipp

---

1. Joshua Klipp (*ZIP code: 94107)*

2. K Desby (*ZIP code: 94118)*

3. Bryan Dillingham (*ZIP code: 94107)*

4. Natalie Downe (*ZIP code: 94019)*

5. Shaun Aukland (*ZIP code: 94103)*
I object to the removal of any resident voice in appealing tree removals. There is a well-documented history of departmental overreach, non-compliance with laws, and general laziness that the appeals process is intended to provide a check on.

6. Sara Alexander (*ZIP code: 94118)*
Please take a long time to become trees. Let's protect the ones we have. They are precious....

7. Shawna McGrew (*ZIP code: 94122)*

8. Robert Hall (*ZIP code: 94117)*

9. David Romano (*ZIP code: 94121)*
Trees and the tree canopy are critical to the livability of the City. We need to increase and enhance our tree canopy, plant more trees and keep the trees we have.

10. Natalia Peschiera (*ZIP code: 94110)*
I'm signing this petition as a long time resident of SF and a member of mission verde because I am very concerned with the proposed changes to legislation that will negatively impact our relatively small and struggling urban forest canopy. The trees are a vital piece of our communities' health and wellbeing. We must do better for the trees and the people who live amongst them - For today and generations to come.

11. John Mendoza (*ZIP code: 94110)*

12. Judy Irving (*ZIP code: 94133)*
Removing the public's right to appeal has nothing to do with streamlining, and everything to do with the fact that SFRPD broke the law, illegally removed trees, and got caught red-handed by the Board of Appeals. What's worse, if City-initiated tree removals aren't appealable, this incentivizes private developers to get the City to do its tree removals for them, on the taxpayer dime.

13. Roz Arbel (*ZIP code: 94118)*
Please do not remove the community's right to save SF's already dwindling urban canopy!
I never thought I would see the day when our city's Democratic process would be threatened in such a way. As the petition says, it's not about streamlining the building of affordable housing, it's about preserving the nature that already exists in our city. And when you remove a healthy, mature tree, you're not only removing the tree, you're removing the nature that depends on its existence - including humans.

14. Jacqueline Nauman (*ZIP code: 94018)*
Cities need greenery. Take that away and not only is the air quality affected, the city dwellers are negatively affected. There are more reasons than air for having trees visible in urban areas. Read up on Barcelona and how badly that city is affected by no parks or greenery. This is a horrible idea to turn SF into a concrete jungle!!

15. Nancy Shanahan (*ZIP code: 94133)*

16. Renee Lazear (*ZIP code: 94116)*

17. Bridget Maley (*ZIP code: 94123)*

18. SON-SF ~ Save Our Neighborhoods SF (*ZIP code: 94116)*

19. Melinda MacNaughton (*ZIP code: 94018)*

Not Ok to Silence the public about tree concerns. Trees are most important for our survival with climate change and providing what minor habitat SF has left. Not Ok to put developers first over a struggling environment.

20. Courtney Damkroger (*ZIP code: 94109)*

21. Lisa Arjes (*ZIP code: 94122)*

22. Laurew Frishman (*ZIP code: 94018)*

23. Judith Berkowitz (*ZIP code: 94110)*

24. Dorothy Pasquinelli (*ZIP code: 94018)*

25. DANIEL MATAROZZI (*ZIP code: 94110)*
Pls. stop the destruction of our urban forrest by rejecting this developer friendly regulation.

26. Angelina Matarozzi (*ZIP code: 94110)*

27. Charlotte Mooney (*ZIP code: 94118)*

28. Claire Mills (*ZIP code: 94123)*

29. Barbara Heffernan (*ZIP code: 94123)*
Save our trees and stop this nonsense

30. Marie Sorenson (*ZIP code: 94110)*

31. Karen Breslin (*ZIP code: 94127)*

32. Janet Monfredini (*ZIP code: 94127)*
This speaks for itself. Trees make all the difference.....

33. SHARON HAWLEY (*ZIP code: 94110)*

34. Sigrid Bull-McCarthy (*ZIP code: 94122)*
We need more trees not less. If there is a sick and dying tree that poses a threat, it should be replaced with 3 new trees when removed. But no willy nilly tree removal. A concrete jungle is not the city we want. Protect green spaces and protect trees. Keep our right to have a say in what we want for our city!!

35. John Nulty (*ZIP code: 94142)*

36. Nancy Federico (*ZIP code: 94122)*

This is my right! SFRPD is breaking the law!

37. Wayne Johnson (*ZIP code: 94114-2417)*

38. Sarah Bellrichard (*ZIP code: 94110)*

39. Ruth Malone (*ZIP code: 94121)*

40. Katherine Petrin (*ZIP code: 94133)*

41. Greg Giachino (*ZIP code: 94133)*
This move has to be a joke, right?

42. Tomasita Medál (*ZIP code: 94122)*

43. Lynne Burwell (*ZIP code: 94118)*

44. Jamie Wong (*ZIP code: 94116)*

45. Marcus Wong (*ZIP code: 94116)*

46. Erica Zweig (*ZIP code: 94122)*
Another giveaway to developers - there should be greater requirements for developers to increase and enhance SF Green infrastructure! Its a minor hoop to jump and pocket change cost to developers to plant around their new concrete structures. An absurd giveaway!

47. KEN RACKOW (*ZIP code: 94109)*

48. Esfir Shrayber (*ZIP code: 94122)*
Please protect our trees , our oxygen. We need them.

49. Linda Lawrence (*ZIP code: 94804)*
Protect our urban canopy!

50. Aaron Goodman (*ZIP code: 94127)*
See Glen Park Trees, see Excelsior Trees, Mc Laren Park Trees, and Parkmerced Trees along right of way.

51. Mark Peters (*ZIP code: 94114)*

52. Doug Comstock (*ZIP code: 94117)*

53. Mark Beyer (*ZIP code: 94110)*
We need trees! We want trees! Please allow YOUR constituents a voice.

54. Tes Welborn (*ZIP code: 94117-1802)*

55. Rita Da Luz (*ZIP code: 94114)*
People deserve to be heard. Furthering a concrete jungle isn’t in the beat interest of SF in the long run.

56. Leslie Smith (*ZIP code: 94611)*

57. Patricia Taber (*ZIP code: 94114)*
San Francisco has, for a major city, the fewest number of trees than most US cities. Shameful, we should embrace trees not only for their esthetics but also for their positive contribution to our environment.

58. Elizabeth Kiefling (*ZIP code: 94110)*
Preserving our urban forest is fundamental to the health and prosperity of San Francisco’s community, culture and well being.

59. Mary Anne Giglio (*ZIP code: 94018)*

60. Rell Sanderson (*ZIP code: 94114)*

61. Stephanie Peek (*ZIP code: 94116)*

62. Dinorah Salazar (*ZIP code: 94112)*

63. peggy huff (*ZIP code: 94133)*

Eliminating this right to appeal will result in City projects removing trees en masse without oversight, and will incentivize private developers to persuade the City to remove trees on the taxpayer dime.

Please, reject File #251211 amending San Francisco's Public Works Code Article 16.

64. Steve Wilkerson (*ZIP code: 94127)*

65. Scott Feeney (*ZIP code: 94110)*
I've come out on volunteer shifts to water trees with Mission Verde, trees that wouldn't be there without the tree removal appeal process. We love our street trees and want more, not less. And since large scale development often tears up the sidewalk anyway, planting trees at that time just makes sense, it's more efficient! Please reject this legislation and help grow our tree canopy, not shrink it.

66. kim snead (*ZIP code: 94117)*

67. Dave Osgood (*ZIP code: 94105)*
Significant trees are currently slated for removal along Howard Street for largely cosmetic reasons.

We need our right to appeal these misguided decisions.

68. Mahdi Rahimi (*ZIP code: 94110)*

69. bea manuel (*ZIP code: 94112)*

70. Jeff Daniel (*ZIP code: 94116-2613)*

71. Floriana Spezza (*ZIP code: 94122)*

72. Maggie Grabmeier (*ZIP code: 94110)*
Please commit to keeping San Francisco green! As a Mission Verde volunteer, I love to see the community out enjoying our trees. It makes our neighborhoods healthier and more beautiful. It's so important for San Franciscans to feel our connection to nature! Thank you for listening!

73. STEVE WARD (*ZIP code: 94122)*

74. Michael Nulty (*ZIP code: 94142-0846)*
In contrast, many other California cities maintain strong appeal processes to ensure accountability:Beverly Hills: Appeals to the Planning Commission (Municipal Code Title 10, Chapter 3).
Pacifica: 10-day appeal period to Planning Commission, with further escalation to City Council (Title 4, Chapter 12).
Los Altos: 10-day public notification for appeals to City Clerk.
Mountain View: Appeals to Urban Forestry Board or City Council within 10 days.
Santa Cruz: Appeals to Parks and Recreation Commission for heritage trees.
Saratoga: 15-day appeal window for nearby homeowners.
San Luis Obispo: Appeals to Tree Committee.
Santa Monica: Reviews by Urban Forest Task Force.
Pasadena: Standard zoning code appeals for tree protections.

These models demonstrate that appeals foster community trust and prevent arbitrary removals, unlike the proposed streamlining, which could lead to unchecked tree loss.

75. RADOGO ULUINADAVE (*ZIP code: 94102)*

76. Tricia Downey (*ZIP code: 94122)*
Please, reject File #251211 amending San Francisco's Public Works Code Article 16.

77. Paula L (*ZIP code: 94121)*

78. Harold Miller (*ZIP code: 94188)*
Help us save the trees

79. SUSAN BRYAN (*ZIP code: 94102)*

80. Gwendalina Carrera (*ZIP code: 94044)*
We need MORE trees in SF, not fewer.

81. paul wermer (*ZIP code: 94115)*
Trees bring health benefits and environmental benefits AND create the more appealing streetscapes that tourists appreciate

82. Carol Brownson (*ZIP code: 94115)*

83. Deborah Gallegos (*ZIP code: 94112)*
We need more tree plantings in every neighborhood to provide all the medicinal properties that trees have to offer in the environment.

84. Belinda Irons (*ZIP code: 94105)*
Please do not remove trees on Howard St.

85. tom fenwick (*ZIP code: 94122)*
This tree reform makes no sense. Just make it easier and faster to get a permit to plant the trees

86. Katharine Demgen (*ZIP code: 94105)*

87. Avrum Shepard (*ZIP code: 93291)*

88. Matt Laroche (*ZIP code: 94122)*

89. Carla Schlemminger (*ZIP code: 94123)*

90. Ann Rubin (*ZIP code: 94133)*

91. Stephen Davis (*ZIP code: 94044-1517)*
Please maintain the public's right to appeal tree removals in San Francisco. Construction is necessary for the city, of course, but it should not destroy existing trees. Mature trees do so much good for removing CO2, providing habitat for birds, and improving the urban scenery.

92. Margaret O'Brien (*ZIP code: 94121)*

93. Tony Tantillo (*ZIP code: 94105)*

94. John Anderson (*ZIP code: 94115)*
Particular consideration should be given to the remaining coast live oaks, such as the ones on the south block of Laurel St. Architects have a long history of ignoring the natural world, an unfortunate legacy of colonialism. As a city, we should do better.

95. Cathwrine Dodd (*ZIP code: 94131)*
Trees are life. They bring shade, oxygen and charm to the city. That are home to birds. They take

generations to grow. Greed of politicians and the Developers who support them must not continue. Also oppose the ATT Tower in the canopy behind the police academy. The construction will kill off entire parts of forest.

96. Maximilienne Ewalt (*ZIP code: 94112)*
To: San Francisco Board of Supervisors
From: Maximilienne Ewalt

Mayor Lurie and Supervisor Wong's proposals for San Francisco's street trees are disastrous. We already have the smallest urban canopy of any major city in the U.S., and our failure to invest in our City trees has allowed even this small tree canopy to decline. We ask you to not allow Developers to have the choice of planting trees or paying an inadequate fee. This will lead to even fewer trees on City streets.

And we ask you not to eliminate the public's right to appeal City-initiated tree removals. These appeals, for City projects, have nothing to do with expediting development. Additionally, these appeals have lead to innovative results, such as Mission Verde - one of the most innovative City/Community partnerships that resulted in 3x more trees being planted along the Mission District's cultural corridor. Eliminating this right to appeal will result in City projects removing trees en masse without oversight, and will incentivize private developers to persuade the City to remove trees on the taxpayer dime.

Please, reject File #251211 amending San Francisco's Public Works Code Article 16.

97. Linda Weiner (*ZIP code: 94110)*

98. Peter Fortune (*ZIP code: 94133)*

99. Mearu Takatsu (*ZIP code: 94123)*
REJECT Mayor Lurie's and
Supervisor Wong's propposed amendment to the Public Works Code -- reject File #2151211 amendment to the SF Public Works Code Article 16.

100. Elias Berbari (*ZIP code: 94116)*

101. Catherine Chase (*ZIP code: 94111)*
It is important to keep the tree canopy we have and add to it if at all possible.

102. deanne delbridge (*ZIP code: 94123-1175)*
Thank you for starting this, Joshua. Every effort to save our trees in San Francisco is totally worth it and you and only a small handfull of others continue this work by yourselves. Please let me know how to reach you.

103. Linda Shaffer (*ZIP code: 94121-3255)*

104. Anna Esquivel (*ZIP code: 94116)*
It’s disturbing that the tree canopy in San Francisco is less than half the national average. This city needs to do better to protect and preserve the trees are in place!

105. Judi Gorski (*ZIP code: 94116)*

106. Chandra Friese (*ZIP code: 95476)*

107. Barbara Delaney (*ZIP code: 94122)*

108. Holly Watts (*ZIP code: 94116)*

109. DOUGLAS ENGMANN (*ZIP code: 94109)*
Keep the appeals process for the public to object to tree removal

110. Cath Ann Giacomini-McDonald (*ZIP code: 94116)*

111. An anonymous signer (*ZIP code: 94103)*

112. Kerrie Walsh (*ZIP code: 94116)*

113. Maureen McVerry (*ZIP code: 94107)*
This is important rule that protects everyone in the city - do not cut down mature trees.

114. Lauren Meredith (*ZIP code: 94121)*
Trees are great for people who was to breathe, those who want to see something beautiful around them, those who want to heal quicker after illness… I really hate that they are killed for construction convenience.

115. Heather Davies (*ZIP code: 94116)*
Please do not change the review process for tree removal. It is essential for SF bird populations to retain this canopy. Trees are part of our beloved cultural landscape. Trees help lower the effects of urban heat islands. Trees take decades to mature and are not readily readily replaceable. Public review and input on tree removal should be retained.

116. An anonymous signer (*ZIP code: 94122)*

117. Laurette Tanner (*ZIP code: 94122)*
Trees help create the air we breathe

118. Rebecca Robertson (*ZIP code: 94105)*

119. Jonathan Maguire (*ZIP code: 94116)*

120. Merrill Randol (*ZIP code: 94118)*

121. Al hawley (*ZIP code: 94118)*
Alan wong this legislation is idiotic. You claim it is to provide in lieu fees for planting trees in high need

areas. YOUR DISTRICT is a HIGH NEEED AREA! Many of your streets lack adequate street trees. This and your work to allow more parking is in direct conflict with planning code seeking to improve permeability initially started because people were paving over all of the front right of way to park making your district one of the worst offenders for stormwater runoff and pollution.

122. Jascenta Napier (*ZIP code: 94105)*

123. Linda Bartlett (*ZIP code: 04115)*
Please save any trees and do not remove. We love the trees and they help our community to be beautiful and places for birds to build nests and survive.

124. aaron brick (*ZIP code: 94134)*

125. Margot Garey (*ZIP code: 94115)*
More, NOT less trees in San Francisco.

126. george williams (*ZIP code: 94122)*

127. Alan Shaw (*ZIP code: 94103)*

128. Rosa Maline (*ZIP code: 94122)*
Trees help to make streets and cities beautiful.

129. Sharon Harrison (*ZIP code: 94118)*

130. Peter Rothe (*ZIP code: 94127-1848)*
plant more trees

131. Norma Gengler (*ZIP code: 94115)*
Save our trees!

132. Eric Shackelford (*ZIP code: 94116)*

133. Karen Auby (*ZIP code: 94116)*
My supervisor, Mr Wong, is against trees and parks but very interested in adding more parking.

134. Jim Hannah (*ZIP code: 94114)*
Thanks for bringing this to our attention. More trees

135. Joel Sayre (*ZIP code: 94122)*
More Trees!

136. Diana Hazas (*ZIP code: 94112)*
Prioritize trees!!

137. Flannery Alber (*ZIP code: 94116)*

138. Mary Klipp (*ZIP code: 94131)*

139. Lance Carnes (*ZIP code: 94133)*

Last Name Carnes
Email lacarnes@gmail.com
Zip/Postal Code 94133

Comments

You may receive email updates from Joshua Klipp, the creator of this petition.

Protect San Francisco Trees!
San Francisco Board of Supervisors

It's one thing to streamline permits. It's another thing to harm the minimal green infrastructure SF has. Mayor Lurie wants to allow developers to choose between planting trees, or paying an inadequate fee to the City to do it instead. This means not only do we lose trees, but developers can permanently design over spaces that might have accommodated trees in the future.

Additionally, Mayor Lurie seeks to remove the public's right to appeal when a City department initiates a tree removal. This isn't about housing or development. This would include, for example, when SFMTA sought to remove every tree on Van Ness (~200) for the new bus lane. Or when SFDPW sought to remove every tree on 24th Street (~77) between Mission and Potrero. Or when Better Market Streets sought to remove every tree on Market Street for its new sidewalks (~700). If the public didn't have the right to appeal, these trees would be gone. Because of the appeals process, trees were saved, plans were revised, and City-community partnerships were formed.

Removing the public's right to appeal has nothing to do with streamlining, and everything to do with the fact that SFRPD broke the law, illegally removed trees, and got caught red-handed by the Board of Appeals. What's worse, if City-initiated tree removals aren't appealable, this incentivizes private developers to get the City to do its tree removals for them, on the taxpayer dime.

Tell Mayor Lurie that we can - and must - do better. For our trees, for the planet, and for our future.
Petition by
Gravatar
Joshua Klipp
San Francisco, California

To: San Francisco Board of Supervisors
From: Lance Carnes

Mayor Lurie and Supervisor Wong's proposals for San Francisco's street trees are disastrous. We already have the smallest urban canopy of any major city in the U.S., and our failure to invest in our City trees has allowed even this small tree canopy to decline. We ask you to not allow Developers to have the choice of planting trees or paying an inadequate fee. This will lead to even fewer trees on City streets.

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appeals, for City projects, have nothing to do with expediting development. Additionally, these appeals have lead to innovative results, such as Mission Verde - one of the most innovative City/Community partnerships that resulted in 3x more trees being planted along the Mission District's 24th Street cultural corridor. Eliminating this right to appeal will result in City projects removing trees en masse without oversight, and will incentivize private developers to persuade the City to remove trees on the taxpayer dime.

Please, reject File #251211 amending San Francisco's Public Works Code Article 16.

City trees are SF assets (and beautiful greenery) that all citizens depend on for a living and beautiful means of keeping SF's air fresh and our environment green and thriving.

Removing taxpayers' ability to protest the removal of trees via hearings at DPW and Board of Appeals curtails our rights as citizens, to protect these important and health-giving assets.

Please keep current appeal processes in place.

Thank you,
Lance Carnes

140. Rosario Cervantes (*ZIP code: 94112)*
Greenery and growth of our city over developers any time

141. Nan Kornfeld (*ZIP code: 94122)*

142. Chloe Gonzalez Coyle (*ZIP code: 94124)*

143. Beth Patty (*ZIP code: 94122)*
Please keep our city green

144. Jeffrey Beck (*ZIP code: 94122)*

145. Deidra White (*ZIP code: 94118)*

146. Susan Spellman (*ZIP code: 94116)*

147. Lori Liederman (*ZIP code: 94122)*

148. Lael Robertson (*ZIP code: 94107)*

149. Kerri Finn (*ZIP code: 94118)*
Save our trees. We need shade, shelter, oxygen, beauty, preserving living things and homes for our neighboring critters. Leave nature only.

150. Usha Moss (*ZIP code: 94114)*

151. Patricia Sur (*ZIP code: 94121)*

152. Molly Hayden (*ZIP code: 94117)*

153. Cathy Morgan (*ZIP code: 9413)*

154. Judy Minton (*ZIP code: 94107)*

155. Christine Innes (*ZIP code: 94107)*

156. Alice Cassman (*ZIP code: 94117)*
Please protect the trees!

157. karen LARSEN (*ZIP code: 94107)*
We need our trees and have already lost too many. Please re-consider letting developers cut down trees without public input.

158. Kelly Vance (*ZIP code: 94117)*

159. Helen Vander Wende (*ZIP code: 94122)*

160. Jaimie VanPernis (*ZIP code: 94118)*
Save the trees!

161. Marguerite Felts (*ZIP code: 94112)*

162. Nikita Van beek (*ZIP code: 94121)*

163. James Estey (*ZIP code: 94131)*
Keep the trees and add a few more.

164. Cade Peterson (*ZIP code: 94121)*

165. Robin Grossinger (*ZIP code: 94705-1082)*

166. Susan Cronin Parano (*ZIP code: 94121)*
Because these trees are lovely and should not be cut down! A redwood especially ! We need more green!

167. JOAN M BRONER (*ZIP code: 94122)*
We need all trees & those trees need to stay!

168. Mara Sohm (*ZIP code: 94115)*

169. Paul Dohrmann (*ZIP code: 94122)*
Save trees and make the city more green.

170. Bradley Golden (*ZIP code: 94117)*
Something's wong, Lurie-ing the public to lose out to developers over trees is no bueno.

171. Kyung Choi (*ZIP code: 94116)*
SF needs more trees to keep the fresh environment as they produce oxygen far more than Carbon dioxide.
The developers are destroying SF's healthy, natural environment!

172. Blair Czarecki (*ZIP code: 94109)*

173. Brian Reyes (*ZIP code: 94122)*

174. Alan Carpenter (*ZIP code: 94114)*

175. Carolyn Kincaid (*ZIP code: 94112)*

176. Sharon Wilensky (*ZIP code: 94122)*

177. Don Ino (*ZIP code: 94121)*
Corporate developers cannot have carte blanche in disregarding neighborhood charm.

178. Rasa Moss (*ZIP code: 94114)*

179. David Kerby (*ZIP code: 94114)*

180. Michael Rothmann (*ZIP code: 94133)*

181. Susan Cieutat (*ZIP code: 94102)*

182. Jen dougherty (*ZIP code: 94122)*
Please stop destroying our beautiful city

183. Robert Sutton (*ZIP code: 94127)*

184. Sheila Fischer Kiernan (*ZIP code: 94131)*

185. Diem Tran (*ZIP code: 94105)*

186. Rebecca Misner (*ZIP code: 94131)*

187. Carolyn Johnston (*ZIP code: 94127)*

188. Ariane Eroy, Ph. D. (*ZIP code: 94121)*
Realtors, Developers, Investors too often care nothing about the people, or our City, or our beleaguered planet. Their buildings will not give us oxygen or sequester carbon dioxide. Yet Mayor Lurie and the Board has yet to stop them.

We demand that our politicians stop currying favor to the Wealthy, to Corporations, and to Developers. For their ethos is take-the-money-and run; their modality is selling our city to the highest bidder; and their corruption involves wheeling-and-dealing until the City collapses from their greed.
Such short-sightedness proves that corporate Democrats ignore the Climate Emergency in favor of augmenting their campaign coffers -- at everyone's peril!

Wake up! Humanity is facing an existential crisis that will not be resolved by itself. Such a crisis demands that we focus on healing our environment as the number one issue of our time.

"_Our planet is trying to tell us something. But we don't seem to be listening. My dear friends, the American Museum of Natural History is the ideal place to make the point: This great museum tells the amazing story of our natural world--the vast forces that have shaped forces on life over billions of years. And Humanity is just one, small blip on the radar. But like the meteors which wiped out the dinosaurs, we are having an outsized impact. In the case of climate, we are not the dinosaurs. We are the meteor. We are not only in danger. We are the danger. But we are also the solution. This world over billions of years humanity is just a small blip. In the case of climate change, we are not the dinosaurs; we are the meteor. We are not in danger: We are the danger... But we are also the solution.
Antonio Gutteres
UN Secretary General
June 2024

“When you destroy Mother Nature, you destroy yourself."
Maitreya

189. Scott Simons (*ZIP code: 94107)*
Really, no oversight, we might as well annex San Mateo to get more trees

Whenever I go to another city, the first thing I see is trees, and what a delight that is

Why the uphill struggle for the simplest of beauty and health

Can’t we even agree on this?

190. Madhavan Rangaswami (*ZIP code: 94118)*

191. Xenia Rangaswami (*ZIP code: 94115)*

192. Anjali Rangaswami (*ZIP code: 94118)*

193. Paula Katz (*ZIP code: 94116)*

194. Bev Lips (*ZIP code: 94121)*

195. Irma Lewis (*ZIP code: 94107)*
To: SF Board of Supervisors
From: Irma Lewis
The current proposals for San Francisco's street trees are disastrous. SF has the smallest urban canopy of any major city in the U.S., and our failure to invest in our City trees has allowed even this small tree canopy to decline. This has direct, measurable health impacts, particularly our most vulnerable. We ask you to not allow Developers to have the choice of planting trees or paying a fee. This will lead to even fewer trees on City streets.

We ask you not to eliminate the public's right to appeal City-initiated tree removals. These appeals, for City projects, don't impede development. They've actually led to innovative results, such as Mission Verde - one of the most innovative City/Community partnerships that resulted in 3x more trees being planted along the Mission District's cultural corridor. Eliminating this right to appeal will result in City projects removing trees en masse without oversight, and will incentivize private developers to persuade the City to remove trees on the taxpayer dime.

Please, reject File #251211 amending San Francisco's Public Works Code Article 16.

196. Thomas Herz (*ZIP code: 94131)*

197. Laura Griffiths (*ZIP code: 94131)*

198. Eva Daniel (*ZIP code: 94115)*

199. Lauren Jarrell (*ZIP code: 94122)*
Please do not allow this legislation to happen. We have already lost so many trees and have a very small urban canopy for a city of our size.

200. Anastasia Glikshtern (*ZIP code: 94122)*
We need the trees.
And the city is engaged in deforestation - in parks and open spaces. the street trees are under assault too...

201. Jessica Kalafati (*ZIP code: 94114)*

202. Anton Kalafati (*ZIP code: 94114)*

203. Raisa Chudnovskaya (*ZIP code: 94118)*

204. Eugene Bachmanov (*ZIP code: 94118)*

205. Susanna Klebaner (*ZIP code: 94121)*

206. Svetlana Savchuk (*ZIP code: 94122)*

207. Peter Glikshtern (*ZIP code: 94110)*

208. Elizabeth Gould (*ZIP code: 94114)*

209. Benjie Lasseau (*ZIP code: 94109)*
Save the trees please!

210. Michael Goodsmith (*ZIP code: 94109)*

211. Lorraine Petty (*ZIP code: 94115)*
The Lurie/Wong legislation is destructive to our trees, our neighborhoods, and the health of our people, as well as the power of citizens to oversee and overrule developer and government abuse.

212. Galina Gorodetsky (*ZIP code: 94552)*

213. Susan Vaughan (*ZIP code: 94121)*

214. Chrisanne Bradley (*ZIP code: 94131)*
Protect the trees!

215. Tod Elkins (*ZIP code: 94131)*
We must protect our trees in SF!

216. Patrick Villano (*ZIP code: 94117)*

217. Sem Lederman (*ZIP code: 94116)*

218. Janet Kessler (*ZIP code: 94114)*

219. Diana Scott (*ZIP code: 94116)*
Developers, like the MTA, like to cut trees to enable there projects. Planners need to consider the air we breathe as a planning priority. WE NEED OUR RIGHT TO APPEAL bad planning proposals, to insure this!

220. Daniel Detorie (*ZIP code: 94109)*

221. Diane Rivera (*ZIP code: 92011)*
Protect San Francisco Trees

222. Wendy Lowinger (*ZIP code: 94122)*

223. Jason jungreis (*ZIP code: 94121)*

224. Tim Bailey (*ZIP code: 94115)*

225. Sandy Weil (*ZIP code: 94116-1160)*

226. Dennis Rubenstein (*ZIP code: 94110)*
We need to protect what few trees we have in our city

227. Michele Liapes (*ZIP code: 94109)*

228. Christine Patch-Lindsay (*ZIP code: 94122)*

229. Noel Kelton (*ZIP code: 94107)*
Ty! And good luck; we need our trees!

230. Linda Zimmerman (*ZIP code: 94116)*
very unhappy with tree management on all levels in SF. I pay big taxes and feel my opinions should be heard. SF is looking less and less green.

231. judith zimrin (*ZIP code: 94133)*
we need more trees

232. Robert Heisler (*ZIP code: 94116)*
Lurie is gradually morphing into his real self: a fellow billionaire developer-enabling Maga republican. He has no regard for the wishes of the majority of the people of San Francisco and now that he is ensconced is steamrolling forward the maga machine in San Francisco.

233. Theresa potente (*ZIP code: 94117-1703)*

234. Betsy Eddy (*ZIP code: 94131)*
I feel that removing the public's write to appeal tree removal is a gift to developers and will encourage more developers to put buildings close to sidewalks. Please vote to preserve our green canopy.

235. Bree Brown (*ZIP code: 94118-1435)*

236. E B (*ZIP code: 94110)*

237. Carl Wendorf (*ZIP code: 94127)*

238. Howard Wong (*ZIP code: 94133)*

239. Claudette Brooks (*ZIP code: 94124)*

240. Rebecca Diaz (*ZIP code: 94116)*

241. Laurie Wen (*ZIP code: 94110)*

242. Carolyn Doran (*ZIP code: 94116)*
More trees, but maintain the sidewalks. Less parking. People have to wake up to climate change and tree desert pockets of dangerous heat

243. Claudia Kindler (*ZIP code: 94112)*

244. Erik Greenfrost (*ZIP code: 94124)*

245. Elaine Chan-Scherer (*ZIP code: 94122)*
Trees add so much character to the City. They increase property value. They clean the air. Old trees are valuable in ways that touch the soul. Protect the trees!

246. Maureen Gonzalez (*ZIP code: 941105913)*

247. Andrea Galvin (*ZIP code: 94121)*
Please protect and expand San Francisco's tree canopy! Trees beautify the city, provide habitat for birds and other wildlife, provide increasingly needed shade in the warmer months (and rain protection in winter, are shown to improve people's mental health and sense of well being, and do more to calm traffic on streets than all the BS Muni is wasting our money on. We should be investing in more trees, not making it easier to chop them down.

248. Kayla Dzurek (*ZIP code: 94112)*

249. Lucy Hilmer (*ZIP code: 94121)*

250. Bruce Allen (*ZIP code: 94132)*

251. Elsa Townsend (*ZIP code: 94109)*
Remember how bad the air quality gets when forests are burning? Tree canopies provide a vital way of purifying smoky air!

252. Arthur Adams (*ZIP code: 94121)*

253. Laurie Chaprack (*ZIP code: 94116)*

254. Carolyn White (*ZIP code: 94131)*
Trees and green space are critical elements of our city., for the health and well being of all people.

255. Leslie Koelsch (*ZIP code: 94114)*

256. Roger Underhill (*ZIP code: 94132)*

257. Kathleen Hallinan (*ZIP code: 94147-0124)*

258. sara coe (*ZIP code: 94110)*

259. Nadine May (*ZIP code: 94118)*

260. An anonymous signer (*ZIP code: 94133)*

261. Cathryn Lewis (*ZIP code: 94122)*
WE need our trees as they are the key to our health and welfare.....practically and astheitcally.....please protect our city!! WE voted for you Mayor Lurie and now we need to count on you to do the right thing!!

262. Patricia Acosta (*ZIP code: 94114)*
cities need trees! They make a city more beautiful and more livable! And they make our air cleaner. Let's have more oak trees, and thus help the pollinators thrive! this is so important.

263. Michael McCauslin (*ZIP code: 94112)*
San Francisco trees are precious!

264. Nancy Spangler (*ZIP code: 94127)*
Maintain the Green Canopy.

265. Judith Dancer (*ZIP code: 94132)*
Trees are an important part of our ecosystem for breathing and wellbeing. Our ancestors had it right! Keep the trees and stand for beauty!

266. Victoria Duffett (*ZIP code: 94116)*
There has been a shocking - and frankly ugly - amount of tree clearing around the city. I urge restraint from such great swaths of tree removals!

267. Kim Smith (*ZIP code: 94117)*
We need trees.

268. Richard & Gail Manso (*ZIP code: 94109)*

269. Diane Navarro (*ZIP code: 94134)*
Save our trees

270. Gandhia Andrews (*ZIP code: 94132)*

271. Dennis Ainslie (*ZIP code: 94121)*

272. Lois Brady (*ZIP code: 94123)*

273. Denise Selleck (*ZIP code: 94122)*

274. Laure Cleveland (*ZIP code: 49770)*
Except for the non-native, invasive, fire-hazard, eucalyptus! Please replace them with native trees. Thanks.

275. Helen Strain (*ZIP code: 94132)*

276. Susan richmond (*ZIP code: 94118)*
Trees in San Francisco are essential to its beauty and good for wind mitigation, shade, etc. It has taken decades to get them planted (thank you, Friends of the Urban Forest) and must not be destroyed.

277. Ana Malinow (*ZIP code: 94117)*

278. David Richardson (*ZIP code: 94131)*

279. Olga Ryerson (*ZIP code: 94110)*
Don't remove our right to appeal to the Board of Appeals.

280. Bud Ryerson (*ZIP code: 94110)*
I hope I'm not too late. Please let me know what else I can do.

281. Barbara Kivowitz (*ZIP code: 94131)*

282. Monika Pietraszek (*ZIP code: 94122)*
Please protect our tree and tree canopy.

283. Micah Barth-Rogers (*ZIP code: 94121)*

284. Karla McElroy (*ZIP code: 94122)*
Pls. Mayor Lurie & Borad of Supervisors don't permit this legislative change. People 1st! Let our voices be heard, it's the democratic thing to do... Karla - SF Resident

285. Stephen McGurin (*ZIP code: 94118)*

286. Kathleen McCowin (*ZIP code: 94116)*
Stop cutting down our trees!

287. Herb Leong (*ZIP code: 94134)*

288. Amy Meyer (*ZIP code: 94121)*

289. Christine Hall (*ZIP code: 94117)*

290. Ramona Draeger (*ZIP code: 94117)*

291. C K (*ZIP code: 94044)*

292. An anonymous signer (*ZIP code: 94121)*

293. Frances Rapoport (*ZIP code: 94904)*
Our urban environments will slowly become sterile and perhaps toxic without the plants and trees our ancestors flourished with

294. Suzanne Dumont (*ZIP code: 94127)*
Trees are a critical part of the respiratory health of San Franciscans. Do not allow profit driven developers decide the fate of our precious trees.

295. Tracy Castle (*ZIP code: 94131)*

296. Wesley Saunders (*ZIP code: 94112)*

297. Shannon King (*ZIP code: 94115)*
Trees are absolutely key to the beauty of a city. All you have to do is look at Paris. Their trees are well organized in species and trimmed regularly. We need more trees not less.

298. Gretchen Turner (*ZIP code: 94112-1307)*
No right to appeal a removal. They could take out beautul, established trees that are decades old to make for better residential "views", while the rest of us suffer with no shade!

299. Marilyn Tredinnick (*ZIP code: 94127)*
Trees are so important to our city. Please build our city for the future, not just the present.

300. Barry Hermanson (*ZIP code: 94116)*
Josh,
Thanks very much for your work on growing and protecting the urban canopy.

Barry

301. James Parke (*ZIP code: 94122)*
It has been a long hard slog to increase the livability of San Francisco. Key to that is increasing the arboreal canopy for its aesthetics and for the healthy rain capture for our aquifer. More green space equals more healthy clean water to drink. This is not a Trump state, people matter and we want a green haven from real estate seas of concrete.

302. Charles Bush (*ZIP code: 94115)*
We are rapidly losing our already too small tree canopy.

303. Janie Lucas (*ZIP code: 94110)*

304. Yolanda Catzalco (*ZIP code: 94110)*

305. Leslie de Taillandier (*ZIP code: 94109)*

306. Daniel Strickland (*ZIP code: 94114)*
Our trees help make San Francisco beautiful and a more desirable place to live and work. We need to protect them.

307. Stephen Gorski (*ZIP code: 94116)*

308. Jane Bliss (*ZIP code: 94117)*

309. Kim Russo (*ZIP code: 94122-2923)*
Please keep our city green. We need trees! They are good for us and the wildlife in our city.

310. Calvin Lau (*ZIP code: 94115)*

311. Bette Stockton (*ZIP code: 94133)*

312. David Fairley (*ZIP code: 94110)*

313. Lisa Signoff (*ZIP code: 94122)*
Please save our trees!

314. ALEX KRINEY (*ZIP code: 94117)*

315. Norma Yazbek (*ZIP code: 94137)*

316. Georges Yazbek (*ZIP code: 94127)*

317. Dori Yazbek (*ZIP code: 94127)*

318. Helen Ferentinos (*ZIP code: 94114)*
Keep trees where they are. And, when possible, add MORE TREES!

319. Dorothy Niccolls (*ZIP code: 94121)*

320. Connie Begg (*ZIP code: 94122)*

321. Olena Beyer (*ZIP code: 94127-1037)*

322. Irene Nishimura (*ZIP code: 94102)*
Trees help clean the environment of greenhouse gases. We should encourage the planting of trees.

323. Kelly Torres (*ZIP code: 94134)*

Stop runaway developers!! Our trees matter and so does permitting to build. Thats why the system is in place and it should NOT be altered for greedy developers and their supporters

324. Ray Rauen (*ZIP code: 94134)*

325. Erica Chiarucci (*ZIP code: 94122)*

326. James Collector (*ZIP code: 94118)*
Trees are priceless and no policy should result in SF having fewer trees over time.

327. Noa Beharav (*ZIP code: 94127)*

328. Jeanne Choy Tate (*ZIP code: 94110)*

329. Joel VanderWerf (*ZIP code: 94103)*
I have lived for almost 30 years in SoMa, which had nearly zero trees in 1996. Over the years dedicated volunteers have organized plantings and gotten property developers to contribute. We now have much prettier streets, which visitors frequently compliment. This is not about "streamlining". It's about quality of life, city pride, and welcoming visitors.

330. Melinda Dart (*ZIP code: 94112)*
It is wrong to allow developers to deplete our tree canopy. Doing so will degrade our environment all over the city. Please stand up for our right to be connected to nature, birds, life. Don't turn our whole city into a high rise.

331. Marigrace Cohen (*ZIP code: 94116)*

332. elaine benoit (*ZIP code: 94112)*
No, No, No. We need more trees. We need the right to appeal tree removal.. No to developers having trees removed at taxpayers expense.

333. Lisa Platt (*ZIP code: 94123)*

334. Gae Conte (*ZIP code: 94123)*

335. Deborah J. Nosowsky (*ZIP code: 94131)*

336. gene hwang (*ZIP code: 94103)*

337. Ellen Stephens (*ZIP code: 94127)*

338. Denise Chu (*ZIP code: 94134)*
They wiped out all the trees at the dead end of Raymond Ave. Truly disgusted and no notice. It was like a massacre.

339. JoAnn Yates (*ZIP code: 94116)*
I am particularly annoyed with Supervisor Wong supporting this initiative. D4 may easily have the least number of trees in the city, trees that are extremely important for our health as has been demonstrated by science over and over again. Do not make it easier to remove trees.

340. Kindra Scharich (*ZIP code: 94109)*

341. Mary Cervantes (*ZIP code: 94121)*
Please protect the trees!!! For the future wellbeing of humankind.

342. Maria Sousa (*ZIP code: 94131)*

343. John Ripley (*ZIP code: 94110)*

344. Doreen Gotelli (*ZIP code: 94080)*

345. Mary McAllister (*ZIP code: 94116)*
San Francisco is a cold, windy place, which was treeless prior to settlement. It has been systematically destroying its urban forest for decades. Stop San Francisco's war on trees.

346. Betty Jo Swanson (*ZIP code: 94133-2021)*

347. Jennifer Cook (*ZIP code: 94123)*
Mayor Lurie, you must do better for the future of our beautiful city. The city's trees are our reminders of nature's beauty - they aid in our happiness & the planet's well-being.

348. Don Bliss (*ZIP code: 94110)*

349. Laura Maguire (*ZIP code: 94124)*
SF already has one of the smallest tree canopies of a major metropolitan area in the US and needs to focus on adding a lot more trees and quickly. With increasingly extreme weather caused by global warming, any measure to streamline the removal of trees, when there is an urgent need to plant trees, would be shortsighted to say the very least. Making it easy to remove trees should not be a priority for this mayor. Please focus on what we urgently need—a much greater tree canopy.

350. Christopher Plaskett (*ZIP code: 94110)*

351. Diana Gilbert (*ZIP code: 94134)*

352. Anastasia Yovanopoulos (*ZIP code: 94114)*

353. Ryan Boswell (*ZIP code: 94110)*
We need to maintain and grow the green spaces in this city to be able to have healthy, livable streets and communities. Walking down a street lined with trees versus walking down a glass and concrete corridor are wildly different experiences, and a lifeless streetscape makes a neighborhood feel less

welcoming and comfortable. City departments and developers should not have unquestioned power to harm our communities like this.

354. sofia vilsker (*ZIP code: 94122)*

355. Dan Hasegawa (*ZIP code: 94015)*

356. Karen Schulkin (*ZIP code: 94127)*

357. Rupinder Baidwan (*ZIP code: 94122-2557)*

358. MARLAYNE Morgan (*ZIP code: 94109)*

359. Nathalie Paven (*ZIP code: 94117)*

360. Stan Hayes (*ZIP code: 94133)*

361. Susan Karpenko (*ZIP code: 94122)*
Trees are essential to keeping our air clean and provide protection and food for wildlife. Progreen!

362. Raphael Stricker (*ZIP code: 94127)*

363. Margaret Stroad (*ZIP code: 94127)*

364. Jacqueline Westby (*ZIP code: 94112)*

365. Mahin Charles (*ZIP code: 94110)*

366. Patricia Carazo (*ZIP code: 94112)*

367. Peter Walbridge (*ZIP code: 94107)*

368. Anna Abeyta (*ZIP code: 94112)*
Trees are important for the air quality of our city. Please continue to allow citizens to appeal the removal of trees by developers and others that might want to remove trees. Please, reject File #251211 amending San Francisco's Public Works Code Article 16.

369. Barbara Handler (*ZIP code: 94110-5112)*
PLEASE stop turning SF into Manhattan. YES, we need housing, but throwing up all these ugly, identical looking high rises in pretty & old neighborhoods and thren aslo cutting down the trees ruins the entire character of SF AND is terrible for the climate and our air here.

370. Marilyn Ho (*ZIP code: 94134)*
Your organization is supposed to save trees one at a time. Right now we are close to the loss of 400

trees in the Park within about 2 years. I don't know how clear cuttings of a glove are possible. I hope your organization can come up with a guideline to relate it to the new Mayor's office. This tree-cutting activity is not limited to McLaren Park. There are alarming numbers of trees being taken down for weak reasons, i.e. fire, safety, and sunlight for future native plants. I have a friend who is a McLaren Collective volunteer who planted a native garden in the park and watched it being neglected and died. Is there a timeline for replanting any of the trees? So far I haven't seen anything.

Climate Change is a real threat and cutting down a large number of trees that's been here for 75 yrs is not a solution. We can stop this madness.
Thank you for your attention.

371. An anonymous signer (*ZIP code: 94107)*

372. Nancy Keane (*ZIP code: 94118-3523)*
We need more trees, not fewer trees! I'd support a new law requiring developers to double the number of existing trees.

373. James Edwards (*ZIP code: 94131)*

374. Amanda Rodriguez (*ZIP code: 94110)*
Trees are vital for all of our health. Please prioritize them!

375. Ronnie Zuckerberg (*ZIP code: 94131)*

376. Carol Faulkner (*ZIP code: 94116)*

377. Megann Sept (*ZIP code: 94110)*

378. Christel Henderson (*ZIP code: 94124)*

379. Rosana Castrillo Diaz (*ZIP code: 94110)*

380. Francisco Beltran (*ZIP code: 94121)*

381. Bill Snyder (*ZIP code: 94121)*

382. Rachel Aloy (*ZIP code: 94118)*

383. Barbara Butler (*ZIP code: 94116)*
Protect San Francisco trees and continue to create a future with more trees!

384. Marc Duffett (*ZIP code: 94116)*
If property owners are required to pay for the upkeep and replacement of sidewalks, then they should at least have the right to appeal the fate of the trees that are so important to the shared character of our neighborhoods and the city at large.

385. Carolyn Shuman (*ZIP code: 94127-1128)*

386. Lisa Bayan (*ZIP code: 94118)*
We need trees not concrete.
The public should have a voice

387. Jua Burciaga (*ZIP code: 94112)*

388. Linda Twigfire (*ZIP code: 94107)*

389. Gretchen Addi (*ZIP code: 94127)*

390. Susan Bostrom-Wong (*ZIP code: 94121)*
I hav planted 6 street trees in San Francisco through Urban Forest. We need more trees in our city. Protect what everyone have now and in the future.

391. Laurie Dunlap (*ZIP code: 94115)*
We need MORE trees, no fewer. Protect our trees and plant more.

392. Elizabeth Doyle (*ZIP code: 94112-1335)*
We need more trees in San Francisco, and they should be part of any new planning project. The public should be allowed to appeal when tree removals affect them.

393. laureen bergeron (*ZIP code: 94110)*

394. shoshanah dobry (*ZIP code: 94124)*
We need tree canopy for the overall health of the City. If a developer decides to remove a tree then they should pay a $10K fine/tree & plant the same # of trees in a comparable space before they can move forward on that particular project.

395. Douglas Flinn (*ZIP code: 94116)*

396. Elizabeth DiMicco (*ZIP code: 94127)*

397. Steve Lumley (*ZIP code: 94127)*

398. Thomas Yaussy (*ZIP code: 94114)*

399. sue denlinger (*ZIP code: 94131)*

400. Dorothy Ruggles (*ZIP code: 94127)*
Please do not allow this unchecked and unwarranted tree cutting around the city.

401. Laura Kemp (*ZIP code: 94134)*

As a neighbor who has been actively involved in helping plant trees in my neighborhood and my street, I am for planting more street trees in our urban areas. Trees are necessary for a healthier environment, our personal and collective wellbeing, and help bring beauty and grace to our concrete spaces. Any proposal to remove the city's urban tree canopy without community input is preposterous and undemocratic. I am strongly opposed. Thank you.

402. stacy thompson (*ZIP code: 94117)*

403. martin zanfardino (*ZIP code: 94133-2957)*

404. Dianne Prichard (*ZIP code: 94117)*
What is their reasoning for God's sake? Partnered with developers? Very suspicious. Especially, if they don't care about input from voters. Cutting down healthy trees in SF is a dimunition of lifestyle.

405. Susan Mullaney (*ZIP code: 94122)*
This is a really horrible loophole for developers that harms the rest of us. Once the sidewalk can't accommodate a tree well the opportunity will never come back. And removing the right to appeal is too totalitarian for our city.

406. Momoko Otani (*ZIP code: 94123)*

407. Callie Floor (*ZIP code: 94117)*

408. Michael Rich (*ZIP code: 94112)*
We need nature.

409. Revel P (*ZIP code: 94116)*

410. Dory Culver (*ZIP code: 94109-2304)*

411. Elaine Bonn (*ZIP code: 94116)*

412. Phillip Battaglia (*ZIP code: 94114)*

413. Victor Stern (*ZIP code: 94127)*

414. Margaret Sletteland (*ZIP code: 94133)*

415. Caroline Strongman (*ZIP code: 94122)*

416. Debolina Dutta (*ZIP code: 94112)*
This makes no sense. Why would the city make it less livable by removing and then allowing developers the opportunity to bypass planting trees. There are numerous social, environmental and quality of life benefits that's trees bring.
This is yet another way Mayor Lurie is NOT the people's mayor and rather developers' mayor.

417. Sandy S.Alvarez (*ZIP code: 94122)*
Please keep our city with lungs and green areas for our overall health.

418. Mitch Dalition (*ZIP code: 94117)*

419. Darlene Horton (*ZIP code: 94107)*
Please develop a sustainable plan to maintain and increase trees, even with new developments.

420. Deetje Boler (*ZIP code: 94115-4261)*
The change to this process that is needed, if any, would be 1) to increase the penalty for any tree removals to the point that there would be fewer proposed and 2) to encourage (maybe even fund) neighborhood residents (perhaps focused on teens?) to foster new plantings on their streets.

421. Debra Levin (*ZIP code: 94114)*
We need more trees not less- it's crucial to the beauty & health of San Francisco

422. Nathan Lang (*ZIP code: 94121)*

423. Karen Metro (*ZIP code: 94116)*

424. Kasia Shopov (*ZIP code: 94122)*

425. Richard Darrough (*ZIP code: 94117)*
It's obvious that SF has too few trees.
Good planning will provide them along with the badly needed affordable housing.

426. Kayleigh Henson (*ZIP code: 94121)*
I find it astounding how little is required of real estate developers for the privilege of doing business in SF and the millions upon millions they reap in profits. Yet for some reason the city seems entirely willing to let them off the hook for even the smallest of benefits. The idea that they can pay a negligible fee so they don't have to plant some trees says something deeply sad about the mayor's priorities. And the developers. And the soul of this city. Who, other than a movie villain, wants fewer trees in urban settings. Please don't move forward with this.

427. Joan Varrone (*ZIP code: 94114)*
Trees have so many benefits to a tree canopy and we must protect the trees.

428. Laura Burciaga (*ZIP code: 94112)*

429. Shoshana Lavinghouse (*ZIP code: 94118)*

430. Dolores Perez Heilbron (*ZIP code: 94109)*
Please stop these developers from causing further destruction to the natural growth of trees! Thank you.

431. Cindy Navarro (*ZIP code: 94112)*

432. Regina Sneed (*ZIP code: 94109)*
There used to be a street tree advisory committee that took the role of protecting our canopy of trees in the city. With climate change we need more trees and green spaces for air quality, reduction of heat etc.

433. Jamie Delman (*ZIP code: 94103)*

434. Rosemary Booth (*ZIP code: 94118)*
Never remove the public's right to appeal.

435. Yasuyo Satoh (*ZIP code: 94109)*
Tokyo is one of the highly populated cities. They still keep trees. They make the city look beautiful and refreshing.

436. Kristap Baltin (*ZIP code: 94114)*

437. Terry Baum (*ZIP code: 94114)*

438. Yuko Franklin (*ZIP code: 94131)*

439. Alessandra Kameron (*ZIP code: 94109)*
I affirm the importance of retaining the public's right to appeal city-initiated tree removal in San Francisco. We have every reason to expect that the number of removed trees would easily eclipse the number that would be planted to replace them. Similarly, we are already losing, due to age and disease, trees that are not being replaced. Giving potentially unrestricted preference to developer dollars will only compound this condition.

440. Janet Freeman (*ZIP code: 94121)*

441. Cynthia Joe (*ZIP code: 94109)*

442. Victoria Kirby (*ZIP code: 94109)*
Trees are so important, especially in a city. We need more trees, not less!

443. Bianca Molgora (*ZIP code: 94110)*

444. Chris Bunga (*ZIP code: 94117)*

445. Denise O'Sullivan (*ZIP code: 94118)*
Trees are beautiful and healing.

446. joyce fishman (*ZIP code: 94109)*

447. Robin Phillips (*ZIP code: 94131)*

448. Vera Genkin (*ZIP code: 94116)*

449. Gail Colombo (*ZIP code: 94127)*
We need trees, leave them alone. And do not dare to remove the citizen's right to appeal! Fascism has no place in America.

450. Sophia Andary (*ZIP code: 94121)*

451. David Eldred (*ZIP code: 94122)*
We need trees and the PUBLIC right
to make policy and decisions.

452. Suzanne Smith (*ZIP code: 94109)*

453. Cathy Cohn (*ZIP code: 94122)*

454. Karen Tarantola (*ZIP code: 94127)*

455. Lynn Morgenstern (*ZIP code: 94901)*

456. iona Ali (*ZIP code: 94112)*

457. Nancy Edmonson (*ZIP code: 94132)*
PLANT More Trees! Do Not Cut Them Down. We need green, not dirt.

458. Marlene Tran (*ZIP code: 94134)*
Given the urgency of global warming and for the beautification of our cities, we must preserve all our precious trees. Never allow the cutting of any grandfather trees!

459. Winnie Tsang (*ZIP code: 94134)*
Please DON'T cut down any of our beautiful trees in our City. Let them thrive.

460. Hatun Noguera (*ZIP code: 94127)*

461. Margaret Goeden (*ZIP code: 94116)*
I oppose this misguided effort to reduce accountability and silence the public, regarding the public's ability to request review of tree removal by the city. Thank you

462. Bronwyn Gundogdu (*ZIP code: 94122)*
I am very upset with the ongoing removal of trees throughout the city, and very upset with this plan to stop the appeals process re: tree removal. San Francisco is a high density city - and in many areas an ugly tree desert. The Mayor and the Board of Supervisors should be protecting our already scant tree coverage and promoting increased greening of our city.

463. Tony Villa (*ZIP code: 94122-2807)*
Park and Rec is out of control! They are bleeding the city of money and are poorly run.

464. Mary OConnell (*ZIP code: 94123)*

465. An anonymous signer (*ZIP code: 94122)*
Urban forests keep cities alive in multiple ways.

466. Kyle DeWolfe (*ZIP code: 94109)*
The State wants more housing, the residents of San Francisco want more trees!

467. Nancy Donnelly (*ZIP code: 94121)*
Please don't cut the trees down during demolition at the old hospital on Sacramento street! Work around them!! We need them!

468. Heather Estes (*ZIP code: 94116)*
Of course we need the right to appeal removing trees!

469. Joshua Prieto (*ZIP code: 94122)*

470. Shamika Klassen (*ZIP code: 94115)*

471. Savannah Schoelen (*ZIP code: 94122)*

472. Qian Wan (*ZIP code: 94103)*
Trees are needed

473. Christine Segalas (*ZIP code: 94107)*

474. Kristina Cooper (*ZIP code: 94107)*
What a terrible plan!! We need to PLANT trees not remove them

475. Sebastian Forst (*ZIP code: 94114)*

476. Samara Laxineta (*ZIP code: 94121)*

477. Anna Papitto (*ZIP code: 94131)*

478. Alice Rogers (*ZIP code: 94107)*

479. Debbie Bowman (*ZIP code: 94107)*

480. Abigail Kroch (*ZIP code: 94107)*

481. Rose Arrieta (*ZIP code: 94110)*
Please don't silence us. Support our planet and our future.

482. Shalmali Bane (*ZIP code: 94103)*

483. Joseph Barrett (*ZIP code: 94127)*

484. Collin Tharp (*ZIP code: 94107)*

485. Adam Lippe (*ZIP code: 94122)*

486. Elena Giacoman (*ZIP code: 94110)*

487. Teja Pattabhiraman (*ZIP code: 94117)*

488. Marisa Johnson (*ZIP code: 94115)*
Please do not cut down any planted mature trees that can b saved. Takes years with newly planted.

489. Jen Fowler (*ZIP code: 94131)*

490. Harold Klingsporn (*ZIP code: 94109)*
Residents need a voice in such changes to liveability

491. W Chan (*ZIP code: 94102)*
Trees in cities are a great benefit for those who walk or roll. They also beautify our communities and increase real estate values. Keep the trees promised by the developers!

492. Josh Jagerman (*ZIP code: 94103)*

493. KATINA ANTOINE (*ZIP code: 94107)*
Respect nature. Leave the trees alone, the community has a right to object this action.

494. Josh Bruck (*ZIP code: 94131)*
Don’t take away the right to appeal the cutting of trees!

495. Rebecca Hardy (*ZIP code: 94107)*

496. Patrick Monette-Shaw (*ZIP code: 94109)*
In addition to removing the public's right to appeal tree removals, Mayor Lurie’s “Commission Streamlining Task Force” has recommended eliminating the “Urban Forestry Council” completely, and assigning the Forestry Council’s oversight duties to the Commission on the Environment — if (a big if) the Environment Commission deigns to take on the oversight functions of the Forestry Council. The Streamlining Task Force also simultaneously recommended taking the Environment Commission out of the City Charter, moving it to the Administrative Code, and converting it from a “regulatory body” to an “advisory body,” slapping a three-year sunset date on the Environment Commission, and taking

budget approval authority over the Environment Department away from the Environment Commission. Applying a sunset date opens the door to the Environment Commission being shut down by the Board of Supervisors anytime in the future.

The Urban Forestry Council was created by the Board of Supervisors 22 years ago in July 2003 under the “Precautionary Principle” to the manage trees in San Francisco by emphasizing public participation in the preservation and expansion of the urban forest before causing actual environmental harm — including through illegal tree removal and greedy developers avoiding responsibility to protect and expand our urban canopy.

In addition to writing the Board of Supervisors about stopping the Mayor’s removal of citizen appeals of tree removals, also consider writing separately to the Board of Supervisors asking them to overturn the Streamlining Task Force’s decision to eliminate the Urban Forestry Council and decision to take the Environment Commission out of the City Charter and apply a sunset date to the Environment Commission!

Through public pressure and advocacy, the Streamlining Task Force just overturned its initial decision to eliminate the “Reentry Council,” showing public pressure works. Contact the Streamlining Task Force at CommissionStreamlining@sfgov.org to overturn eliminating the Urban Forestry Council too!

After all, any District Supervisor who approves any of the Mayor’s tree removal or commission reform “streamlining” goals should face recall from office, just as Joel Engardio was recalled!

— Patrick Monette-Shaw

497. Richie Vasquez (*ZIP code: 94103)*

498. Teresa Palmer (*ZIP code: 94117-1219)*

499. Arthur Paul Cartier (*ZIP code: 94117-1219)*

500. Laurel Myers (*ZIP code: 94107)*

501. Diana Anderson (*ZIP code: 94117)*
Trees give us livability in an increasingly concrete city. They reduce heat in summer, block some wind tunnels and exchange carbon dioxide for oxygen. They take a LONG TIME to GROW- but only an hour to destroy

502. Andrea Biltagi (*ZIP code: 94102)*

503. Frank Lorch (*ZIP code: 94122)*

504. Nicky Trasvina (*ZIP code: 94132)*
Please stop this attack on SF residents, SF trees, and SF birds. San Francisco, as beautiful as it is, still needs our trees for a healthier environment! We also need to follow the law when it comes to protecting our trees from any City department or developer whose intention is to destroy this vital environmental factor that contributes to the health and beauty of San Francisco. What would Saint Francis say ? !

505. An anonymous signer (*ZIP code: 94103)*

506. Jayme Kogel (*ZIP code: 94103)*

507. Paul Giese (*ZIP code: 94103)*

508. Wendy Oakes (*ZIP code: 94117)*
He just lost my vote. This is disgusting

509. Norm Ishimoto (*ZIP code: 94116-1246)*
We have had a Mayten in front of our house since, hmmm, 30 years? From a FUF campaign. SFPW has been erratic at irregular intervals, thankfully infrequent, in its attentions. Wife and I would be highly upset if we came home from shopping and found our Mayten was a stump or badly trimmed.

510. Linda R Miller (*ZIP code: 94121)*
PLEASE DO NOT CUT DOWN ANY TREES - THE BIRDS NEED THEM FOR MANY REASONS AND PEOPLE NEED BEAUTY AND SHADE.

511. Catherine Valentine (*ZIP code: 94127-2143)*

512. Nikhil Gowda (*ZIP code: 94103)*
File No. 251211 - Opposition to Appeals Ban

513. Daniel Dokovna (*ZIP code: 94103)*
Protect our trees.

514. Kelly Fitzgerald (*ZIP code: 94116)*
Plant trees!

515. Zachariah Spellman (*ZIP code: 94116)*
We need our trees to breathe the breeze.

516. Jake Hanft (*ZIP code: 94114)*

517. Barbara Save PRATO (*ZIP code: 94131-1161)*
Save our beautiful native _. I was shocked to see Washington Park without that tree. WHY? Please now replace with a _.

518. Julia Ready (*ZIP code: 94114)*
Cutting trees to
Improve sidewalks passage - can be replaced with trees that have a better root system.

519. Sybil Meyer (*ZIP code: 94131)*
SF doesn't need less foliage!

520. Leah Edwards (*ZIP code: 94103)*

521. Nancy Burrill (*ZIP code: 94109-6553)*

522. Eric Oesterling (*ZIP code: 94115)*

523. Carole Issel (*ZIP code: 94127-2212)*
I was born in San Francisco 82 years ago. The public must have the right to appeal when the City initiates a tree removal. Greenery purifies our air and gives space to our wildlife. Too many trees have been destroyed by the City already. We have to protect them.

524. Loren Jones (*ZIP code: 94127)*

525. Kasey Rios (*ZIP code: 94102)*
To be the vibrant world-class city San Francisco aims for we must increase investment in forest canopy.
This means: protecting the trees we have, planting trees proportionate to development and respecting public process.

526. Terence Craig (*ZIP code: 94109)*
Removing the right to appeal would, of course, streamline new development, but at a considerable cost to beauty of the city. I say keep the right of appeal.

527. David Singer (*ZIP code: 94103)*

528. Keith Robert Saggers (*ZIP code: 94133)*

529. Elissa Matross (*ZIP code: 94114)*
I love trees

530. Shawn Agarwal (*ZIP code: 94103)*
Trees are a part of our community and neighbors shouldn't be stripped of our rights to advocate for them if necessary to protect them.

531. Annie Pearson (*ZIP code: 94121)*
Daniel Lurie is just here for the billionaires. Gross.

532. Victoria Isyanova (*ZIP code: 94132)*

533. Linda Hayashi (*ZIP code: 94118)*

534. Tom Duffy (*ZIP code: 94127)*
We need more trees not less. It's terrible what Parks and Rec is doing at Golden Gate Parkl. They took down a healthy1 50 year old tree in the middle of Hellman meadow that was joy to behold. They also cut down many of the trees around the meadow. They are denuding Lake Merritt on the side

opposite to Fort Funston.

535. Brian Glennon (*ZIP code: 94132)*
Trees over developers!

536. Philip Schwartz (*ZIP code: 94107)*

537. Maryann Hrichak (*ZIP code: 94117)*

538. Jeanine Hawk (*ZIP code: 94116)*
Trees are an important part of our neighborhoods. Don’t let developers buy out.

539. Juliette Hayes (*ZIP code: 94118)*

540. Mahon McGrath (*ZIP code: 94110)*

541. Angela DePaul (*ZIP code: 94133)*

542. Ton-Yun Fang (*ZIP code: 94114)*

543. Ann MacAndrew (*ZIP code: 94112)*

544. Alexander Koodrin (*ZIP code: 94131)*

545. Sebra Leaves (*ZIP code: 94110)*
Why do you want to cut the trees that are sequestering the carbon that would otherwise go into the air and are a major source for cooling our city?

546. Allyson Browne (*ZIP code: 94131)*

547. Marc Brenman (*ZIP code: 94110)*

548. Shelby Morales (*ZIP code: 94015)*
Our trees and green spaces provide immeasurable benefit to the air we breathe and the wild birds and other critters which enrich our lives. They must be responsibly stewarded, not sold out to developers who’s primary concern is their bottom line.

549. Poppy Gilman (*ZIP code: 94122)*

From:	Claudia Stern
To:	Carroll, John (BOS); Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS)
Cc:	Shaun Aukland
Subject:	Public Comment - File No. 251211 - Opposition to Appeals Ban
Date:	Thursday, January 8, 2026 5:55:14 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Chair Melgar and Members of the Land Use Committee,

Please add these comments to the official legislative file for **File No. 251211**.

I have lived and voted in San Francisco since 1985. As a retiree, I now volunteer in the garden (Sutro Park) near my house. I am lucky to have an increasing number of trees on the streets near my home thanks to the Friends of the Urban Forest. These trees reduce heat and noise, provide water absorption during rainy periods, and provide habitat for living creatures. We need more trees to make SF an even better city.

I am writing to **OPPOSE** the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining"; it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.

Furthermore, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

Please **CONTINUE** this item until these democratic and equitable protections are restored.

Sincerely,
Claudia Stern
714 44th Avenue
415 318 6461

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more Click Here.

From: Tisay Baclay
To: Melgar, Myrna (BOS)
Cc: Chen, Chyanne (BOS); Carroll, John (BOS); Mahmood, Bilal (BOS); Board of Supervisors (BOS)
Subject: Subject: Public Comment – File No. 251211 – Opposition to Appeals Ban
Date: Wednesday, January 7, 2026 4:44:10 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Subject: Public Comment – File No. 251211 – Opposition to Appeals Ban

Dear Chair Melgar and Members of the Land Use Committee,

Please add these comments to the official legislative file for **File No. 251211**.

I am writing to **strongly OPPOSE** the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. While framed as administrative "streamlining," this provision fundamentally strips communities of their right to be heard and removes meaningful oversight over decisions that directly affect neighborhood health, environmental equity, climate resilience, and quality of life.

Under current law, when Public Works or another City agency seeks to remove mature trees, residents have the legal right to file an appeal and trigger a public hearing. This process is not theoretical - it works. File No. 251211 would eliminate this safeguard entirely.

The right to public participation and due process is not optional. It is protected under the **First and Fourteenth Amendments of the U.S. Constitution**, including the rights to free speech, to petition the government for redress of grievances, and to due process under the law. Fast-tracking legislation that removes appeal rights, especially when initiated by City departments themselves, raises serious constitutional concerns and undermines democratic governance. San Francisco must not become a city where community voices are treated as impediments rather than essential partners.

San Francisco has long been recognized as a leader in **environmental protection, climate justice, and civic engagement**. At a moment when residents are already absorbing sweeping budget cuts across healthcare, social services, outreach, housing stabilization, and environmental programs, this legislation further erodes trust and participation. The question before us is not whether the City can move

faster, but whether it can do so **without abandoning its values**.

Across the city, residents have stepped up beyond expectations - working in partnership with community-based nonprofits, organizing neighbors, and serving as frontline responders to the consequences of disinvestment. We are the ones operating at ground zero, engaging directly with impacted communities and protecting neighborhood-level environmental health. Removing public oversight ignores this lived experience and weakens outcomes.

I am also deeply concerned about an **equity loophole** in the legislation. While the bill allows developers to pay an In-Lieu Fee in place of planting trees, it fails to clearly define “low tree canopy” neighborhoods. Without a strict, data-driven definition that includes **canopy cover metrics and environmental burden scores**, these funds risk being allocated without regard to actual environmental need, undermining the very equity goals the policy claims to advance.

For these reasons, I respectfully request that the Committee **CONTINUE this item** until public appeal rights, constitutional protections, and clear environmental equity safeguards are fully restored.

Sincerely,
Teresa Dulalas
Resident - SoMa Pilipinas Filipino Cultural Heritage District 6

From:	Loren Craig Harrington
To:	Carroll, John (BOS); Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS)
Subject:	Public Comment - File No. 251211 - Opposition to Appeals Ban
Date:	Wednesday, January 7, 2026 1:18:47 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Chair Melgar and Members of the Land Use Committee,

Please add these comments to the official legislative file for File No. 251211.

I am writing to OPPOSE the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining"; it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.

Furthermore, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

Please CONTINUE this item until these democratic and equitable protections are restored.

Sincerely,

Craig Harrington
Twin Peaks SF

From: Barbara Bagot-López
To: Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS)
Cc: FielderStaff; Carroll, John (BOS); Board of Supervisors (BOS)
Subject: Public Comment - File No. 251211 - Opposition to Appeals Ban
Date: Wednesday, January 7, 2026 10:29:24 AM

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Hello, Chair Melgar & members of the Land Use Committee.

Please add my comments to the official legislative file for **File No. 251211**.

I OPPOSE the elimination of the public right to appeal city-initiated tree removals. Removing due process--removing the voice of SF residents--is not "streamlining"; it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.

In addition, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

Please CONTINUE this item until these democratic and equitable protections are restored.

Sincerely,
Barbara Bagot-López
Resident of Bernal Heights and San Francisco for 49 years who appreciates street trees

From:	Nikhil Gowda
To:	Carroll, John (BOS); Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS)
Subject:	Public Comment - File No. 251211 - Opposition to Appeals Ban
Date:	Wednesday, January 7, 2026 8:48:53 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Chair Melgar and Members of the Land Use Committee,

Please add these comments to the official legislative file for **File No. 251211**.

I am writing to **OPPOSE** the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining"; it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.

Furthermore, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

Please **CONTINUE** this item until these democratic and equitable protections are restored.

Sincerely,

Nikhil Gowda

West SoMa resident and home owner.

From:	Mc Mc 1
To:	Carroll, John (BOS); Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS)
Subject:	legislative File No. 251211. OPPOSE eliminating public appeal for tree removal
Date:	Tuesday, January 6, 2026 11:05:42 PM

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Dear Chair Melgar and Members of the Land Use Committee,
Please add these comments to the official legislative file for **File No. 251211**.
I am writing to **OPPOSE** the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining"; it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.
Furthermore, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.
Please **CONTINUE** this item until these democratic and equitable protections are restored.
Sincerely,
Mary McFadden
Anza VIsta

From:	Frank Lorch
To:	Carroll, John (BOS); Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS)
Subject:	Public Comment - File No. 251211 - Opposition to Appeals Ban
Date:	Tuesday, January 6, 2026 8:35:02 PM

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Dear Chair Melgar and Members of the Land Use Committee,

Please add these comments to the official legislative file for **File No. 251211**.

I am writing to **OPPOSE** the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining"; it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.

Furthermore, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

Please **CONTINUE** this item until these democratic and equitable protections are restored.

Sincerely,
Frank Lorch
Sunset

From:	Andrea Biltagi
To:	Carroll, John (BOS); Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS)
Subject:	Public Comment - File No. 251211 - Opposition to Appeals Ban
Date:	Tuesday, January 6, 2026 7:59:59 PM

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Dear Chair Melgar and Members of the Land Use Committee,

Please add these comments to the official legislative file for **File No. 251211**.

I am writing to **OPPOSE** the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining"; it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.

Furthermore, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

Please **CONTINUE** this item until these democratic and equitable protections are restored.

Sincerely,

Andrea Biltagi

Tenderloin, 94102

From:	Laurel Myers
To:	Carroll, John (BOS); Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS)
Subject:	Public Comment - File No. 251211 - Opposition to Appeals Ban
Date:	Tuesday, January 6, 2026 7:46:40 PM

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Dear Chair Melgar and Members of the Land Use Committee,

Please add these comments to the official legislative file for **File No. 251211**.

I am writing to **OPPOSE** the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining"; it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.

Furthermore, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

Please **CONTINUE** this item until these democratic and equitable protections are restored.

Sincerely,

Laurel Myers, SoMA resident

From:	Amanda Rodriguez
To:	Carroll, John (BOS); Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS)
Subject:	Public Comment - File No. 251211 - Opposition to Appeals Ban
Date:	Tuesday, January 6, 2026 6:57:16 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Chair Melgar and Members of the Land Use Committee,

Please add these comments to the official legislative file for **File No. 251211**.

I am writing to **OPPOSE** the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining"; it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.

Furthermore, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

Please **CONTINUE** this item until these democratic and equitable protections are restored.

Sincerely,

Amanda Rodriguez

Glen Park resident

From:	Rebecca Hardy
To:	Carroll, John (BOS); Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS)
Subject:	Public Comment - File No. 251211 - Opposition to Appeals Ban
Date:	Tuesday, January 6, 2026 6:54:21 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Chair Melgar and Members of the Land Use Committee,

Please add these comments to the official legislative file for **File No. 251211**.

I am writing to **OPPOSE** the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining;" it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.

Furthermore, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

Please **CONTINUE** this item until these democratic and equitable protections are restored.

Sincerely,

Rebecca Hardy, Potrero Hill

From:	Josh Jagerman
To:	Carroll, John (BOS); Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS)
Subject:	Public Comment - File No. 251211 - Opposition to Appeals Ban
Date:	Tuesday, January 6, 2026 6:21:25 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Chair Melgar and Members of the Land Use Committee,

Please add these comments to the official legislative file for **File No. 251211**.

I am writing to **OPPOSE** the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining"; it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.

Furthermore, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

Please **CONTINUE** this item until these democratic and equitable protections are restored.

Sincerely,

Josh Jagerman

From:	Collin Tharp
To:	Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS); Carroll, John (BOS)
Subject:	Public Comment - File No. 251211 - Opposition to Appeals Ban
Date:	Tuesday, January 6, 2026 5:20:43 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Chair Melgar and Members of the Land Use Committee,

Please add these comments to the official legislative file for **File No. 251211**.

I am writing to **OPPOSE** the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining"; it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.

Furthermore, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

Please **CONTINUE** this item until these democratic and equitable protections are restored.

Sincerely,

Collin Tharp

Potrero Hill

From:	Shalmali Bane
To:	Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS); Carroll, John (BOS)
Subject:	Public Comment - File No. 251211 - Opposition to Appeals Ban
Date:	Tuesday, January 6, 2026 4:51:11 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Chair Melgar and Members of the Land Use Committee,

Please add these comments to the official legislative file for **File No. 251211**.

I am writing to **OPPOSE** the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining"; it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.

Furthermore, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

Please **CONTINUE** this item until these democratic and equitable protections are restored.

Sincerely,

Shalmali Bane, SOMA west neighborhood

From: Abigail Kroch
To: Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS); Carroll, John (BOS)
Subject: Public Comment - File No. 251211 - Opposition to Appeals Ban
Date: Tuesday, January 6, 2026 4:35:52 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

- Dear Chair Melgar and Members of the Land Use Committee,

  Please add these comments to the official legislative file for **File No. 251211**.

  I am writing to **OPPOSE** the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining"; it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.

  Furthermore, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

  Please **CONTINUE** this item until these democratic and equitable protections are restored.

  Sincerely,

  Abigail Kroch, SoMa resident

From:	Alice Rogers
To:	Carroll, John (BOS); Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS)
Subject:	Public Comment - File No. 251211 - Opposition to Appeals Ban
Date:	Tuesday, January 6, 2026 4:21:11 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Chair Melgar and Members of the Land Use Committee,

Please add these comments to the official legislative file for **File No. 251211**.

As a decades-long tree advocate and FUF member, I am writing to **OPPOSE** the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining"; it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.

Additionally, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

Please **CONTINUE** this item until these democratic and equitable protections are restored. We need to get this right.

Respectfully,

Alice Rogers

.....

Alice Rogers
10 South Park St
Studio 2
San Francisco, CA 94107

arcomnsf@pacbell.net

From:	Anna Papitto
To:	Carroll, John (BOS); Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS)
Subject:	Public Comment - File No. 251211 - Opposition to Appeals Ban
Date:	Tuesday, January 6, 2026 4:06:40 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Chair Melgar and Members of the Land Use Committee,

Please add these comments to the official legislative file for **File No. 251211**.

I am writing to **OPPOSE** the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining"; it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.

Furthermore, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

Please **CONTINUE** this item until these democratic and equitable protections are restored.

Sincerely, Anna Papitto, Noe Valley

From:	Christine S.
To:	Carroll, John (BOS); Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS); DorseyStaff (BOS)
Subject:	Public Comment - File No. 251211 - Opposition to Appeals Ban
Date:	Tuesday, January 6, 2026 3:56:18 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Chair Melgar and Members of the Land Use Committee,

Please add these comments to the official legislative file for **File No. 251211**.

I am writing to **OPPOSE** the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining"; it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction. The City of San Francisco needs to be adding more trees to beautify the sad streets in SF. I've been trying for 5 years just to get one tree planted after a car crashed into the gorgeous healthy ficus that adorned my street in SOMA. This is shameful. A missed opportunity to have a city that deserves to showoff its natural beauty.

Furthermore, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

Please **CONTINUE** this item until these democratic and equitable protections are restored.

Sincerely,

Christine Segalas
District 6 (SOMA)

From:	Shamika Klassen
To:	Carroll, John (BOS); Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS)
Subject:	Public Comment - File No. 251211 - Opposition to Appeals Ban
Date:	Tuesday, January 6, 2026 3:31:15 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Chair Melgar and Members of the Land Use Committee,

Please add these comments to the official legislative file for **File No. 251211**.

I am writing to **OPPOSE** the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining"; it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.

Furthermore, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

Please **CONTINUE** this item until these democratic and equitable protections are restored.

Sincerely,

Dr. Shamika Klassen, Alamo Square Neighborhood

From:	Ruby Rieke
To:	Carroll, John (BOS); Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS)
Subject:	Public Comment - File No. 251211 - Opposition to Appeals Ban
Date:	Tuesday, January 6, 2026 3:30:19 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Chair Melgar and Members of the Land Use Committee,

Please add these comments to the official legislative file for **File No. 251211**.

I am writing to **OPPOSE** the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining"; it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.

Furthermore, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

Please **CONTINUE** this item until these democratic and equitable protections are restored.

Sincerely, Ruby Rieke Mission District

From:	Shaun Aukland
To:	CPC-Commissions Secretary; Carroll, John (BOS); Dennis Phillips, Sarah (CPC)
Cc:	Ionin, Jonas (CPC); Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS)
Subject:	Opposition & CEQA Objection: File No. 251211 (Street Tree Ordinance)
Date:	Monday, January 5, 2026 12:34:38 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear President So, Chair Melgar, Supervisors, and Commissioners,

I am writing on behalf of FairTrees.org to formally oppose File No. 251211 and to object to the Planning Department's CEQA determination. Please also add this to the legislative file.

1. CEQA Objection. The legislative file states this ordinance is "Not defined as a project... because it would not result in a direct or indirect physical change in the environment." We dispute this finding. The legislation eliminates the public's right to appeal city-initiated tree removals. Historical data proves that the appeals process has successfully preserved hundreds of mature trees that the City intended to remove (e.g., Mission Verde, 24th St).

If the appeals process prevents tree removal, then removing the appeals process will logically result in the destruction of trees that otherwise would have been saved.

This will have an obvious impact to the city's physical environment. A reduction in urban canopy is a physical change to the environment that increases heat islands and reduces air quality. This requires environmental review, not an exemption. As our orgainzation has communicated before, Enivornment Justice Communities like SOMA, the Tenderloin, Bayview Hunter's Point, and others are largely *losing* canopy, not gaining it. Ongoing projects like the Folsom / Howard Streetscape projects that have removed dozens of trees, and only added marginally.

2. The "Equity" Justification is Not Defined. The "In-Lieu Fee" Loophole The bill allows developers to pay fees to plant trees in "neighborhoods with low canopy" but fails to define that term. Without a data-driven definition (like "Equity Priority Communities"), this creates a slush fund where fees generated in high-need districts like SoMa (2.7% canopy) can be diverted to wealthier areas. We have seen this **over and over**, with the federal Inflation Reduction Act grant, as well as Prop L funds. Our organization has been analyzing canopy data from US Forestry, and can provide this to make this a more data-driven process.

3. SF Citizens Lose Their Last Remaining Voice in Trees: Stripping residents of the right to appeal City decisions removes the only check and balance against administrative overreach, and eliminates due process.. This is not streamlining; it is silencing.

We urge you to CONTINUE this item until the CEQA determination is corrected and these amendments are made.

Sincerely,

Shaun Aukland
FairTrees.org

From: Michael Nulty
To: Carroll, John (BOS)
Cc: Melgar, Myrna (BOS); Chen, Chyanne (BOS); Mahmood, Bilal (BOS)
Subject: Opposition to File No. 251211
Date: Friday, January 2, 2026 11:12:47 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Members of the San Francisco Board of Supervisors,

The Alliance for a Better District 6 and many of its affiliate partners are writing in strong opposition to the proposed amendments in File No. 251211, which seek to weaken San Francisco's urban forestry protections by expanding in-lieu fees for street tree planting, exempting accessory dwelling units (ADUs) from planting requirements, eliminating appeals for tree removals by City departments and commissions, and shifting notices to online postings only. These changes prioritize development efficiency over environmental sustainability, public accountability, and the long-term health of our city. San Francisco's tree canopy is already critically low at 13.7%, and these amendments risk further erosion at a time when California grapples with climate change, persistent droughts, and catastrophic wildfires—while the City faces severe budget deficits projected to reach nearly $1 billion in coming years. Below, we outline key points of opposition, drawing from the ordinance details, comparisons to other California cities, and broader environmental and fiscal concerns.

Key Points of Opposition:

1. **Erosion of Mandatory Tree Planting and Immediate Greenery Benefits—Especially Critical Amid Budget Shortfalls**:
    - The proposal allows any development project to pay an in-lieu fee (currently around $2,590 per tree) instead of planting required street trees, even when planting is feasible. This shifts from the current system, where waivers are granted only for impossibility, impracticality, or safety issues, and alternatives like sidewalk landscaping are limited.
    - Exempting ADUs and Junior ADUs from tree requirements ignores their cumulative impact on urban density. New developments without on-site trees exacerbate urban heat islands, increase storm water runoff, and diminish local biodiversity—issues amplified by California's ongoing drought, which has led to water restrictions and heightened fire risks.
    - In recent years, **new development has become one of San Francisco's primary alternative ways new trees get planted**, due to chronic underfunding of city agencies like Public Works' Urban Forestry Bureau. With historic budget deficits—including an $800 million shortfall addressed in the FY 2025-2026 budget and projections of up to $1 billion in future cycles—core urban forestry programs face constraints, reductions in

positions, and reliance on grants or voter-set-asides. In-lieu fees, deposited into the Adopt-A-Tree Fund, may fund future plantings but often result in delayed or off-site actions that fail to benefit the immediate community. Expanding these fees risks reducing even this key source of new trees, when we desperately need more planted now, not deferred payments that could be further strained by ongoing fiscal pressures.

2. **Elimination of Public Appeals and Reduced Transparency**:
    - Under existing law, decisions on street tree removals (including hazard trees) by the Department of Public Works (DPW) or other City agencies are appealable first to the DPW Director and then to the Board of Appeals, with robust noticing via postings, newspapers, and notifications to abutters and organizations.
    - The amendments make these decisions final and nonappealable, limiting public input and oversight. This is particularly concerning for non-hazard trees, where 15-day objection periods currently allow hearings.
    - Replacing newspaper notices with website postings reduces accessibility for non-digital-savvy residents, potentially excluding vulnerable communities.
    - In contrast, many other California cities maintain strong appeal processes to ensure accountability:
        - Beverly Hills: Appeals to the Planning Commission (Municipal Code Title 10, Chapter 3).
        - Pacifica: 10-day appeal period to Planning Commission, with further escalation to City Council (Title 4, Chapter 12).
        - Los Altos: 10-day public notification for appeals to City Clerk.
        - Mountain View: Appeals to Urban Forestry Board or City Council within 10 days.
        - Santa Cruz: Appeals to Parks and Recreation Commission for heritage trees.
        - Saratoga: 15-day appeal window for nearby homeowners.
        - San Luis Obispo: Appeals to Tree Committee.
        - Santa Monica: Reviews by Urban Forest Task Force.
        - Pasadena: Standard zoning code appeals for tree protections.
    - These models demonstrate that appeals foster community trust and prevent arbitrary removals, unlike the proposed streamlining, which could lead to unchecked tree loss.
3. **Exacerbation of Environmental and Climate Challenges**:
    - San Francisco's urban forest enhances walkability, livability, and sustainability by filtering air pollutants, sequestering carbon, and providing shade—essential amid California's wildfires, which have scorched millions of acres and degraded air quality statewide (e.g., the 2020 fires blanketed the Bay Area in smoke).

- Without mandatory planting, new developments contribute to climate change by increasing heat retention and energy use for cooling, while reducing natural defenses against drought-induced water scarcity.
- Trees clean the air of wildfire particulates and support resilience against extreme weather; removing appeal processes risks hasty removals that diminish this buffer. California needs more trees, not fewer, to combat these interconnected crises—yet this ordinance balances toward developer certainty over ecological necessity.

4. **Inconsistency with Broader Policies and Public Welfare**:
    - The ordinance affirms compliance with the California Environmental Quality Act (CEQA), General Plan, and Planning Code Section 101.1, but these amendments undermine the spirit of sustainability and public welfare findings under Section 302.
    - By prioritizing efficiency in development, it overlooks the long-term costs: poorer air quality, higher health risks from heat and pollution, and reduced property values in less green neighborhoods—compounded by budget constraints that already limit proactive planting.
    - Alternative landscaping options (e.g., 75 sq ft per waived tree) are insufficient substitutes, as they lack the full ecological benefits of mature trees.

In summary, these amendments threaten to stall progress on expanding San Francisco's meager tree canopy, diminish public participation, reduce a vital source of new plantings amid fiscal challenges, and heighten vulnerability to climate threats. The Alliance for a Better District 6 and many of its affiliate partners urge you to reject File No. 251211 and instead reinforce protections that mandate on-site planting, preserve appeals, and prioritize urban greening. Our city's future depends on robust environmental policies, not shortcuts that favor short-term gains.

Sincerely,

Michael Nulty
Alliance for a Better District 6
Executive Director

Michael Nulty

P.O. Box 420782
San Francisco, CA 94142-0782
(415) 339-8327 - Direct
(415) 339-8779 - Alliance for a Better District 6
http://abd6.cfsites.org/

From:	Board of Supervisors (BOS)
To:	BOS-Supervisors; BOS-Legislative Aides
Cc:	BOS-Operations; Carroll, John (BOS); Calvillo, Angela (BOS); De Asis, Edward (BOS); Entezari, Mehran (BOS); Mchugh, Eileen (BOS); Ng, Wilson (BOS); Somera, Alisa (BOS)
Subject:	2 Letters Regarding File No. 251211
Date:	Tuesday, December 30, 2025 9:37:15 AM
Attachments:	2 Letters Regarding File No. 251211.pdf

Hello,

Please see attached 2 letters regarding **File No. 251211:**

Ordinance amending the Public Works Code to allow development projects to satisfy street tree planting requirements through payment of an in lieu fee or providing alternative landscaping; exempt accessory dwelling units from street tree planting requirements; eliminate appeals to the Board of Appeals for tree removals undertaken by City departments and commissions; and update in lieu fee reporting requirements; amending the Administrative Code to create a separate account within the Adopt-A-Tree Fund to receive in lieu fees for street tree requirements; amending the Planning Code to update street tree applicability requirements; affirming the Planning Department's determination under the California Environmental Quality Act; making findings of consistency with the General Plan, and the eight priority policies of Planning Code, Section 101.1; and making public necessity, convenience, and welfare findings under Planning Code, Section 302.

Regards,

John Bullock
Office of the Clerk of the Board
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
(415) 554-5184
BOS@sfgov.org | www.sfbos.org

Disclosures: *Personal information that is provided in communications to the Board of Supervisors is subject to disclosure under the California Public Records Act and the San Francisco Sunshine Ordinance. Personal information provided will not be redacted. Members of the public are not required to provide personal identifying information when they communicate with the Board of Supervisors and its committees. All written or oral communications that members of the public submit to the Clerk's Office regarding pending legislation or hearings will be made available to all members of the public for inspection and copying. The Clerk's Office does not redact any information from these submissions. This means that personal information—including names, phone numbers, addresses and similar information that a member of the public elects to submit to the Board and its committees—may appear on the Board of Supervisors website or in other public documents that members of the public may inspect or copy.*

From: San Francisco Tree Campaign
To: Board of Supervisors (BOS)
Cc: Carroll, John (BOS); Ionin, Jonas (CPC)
Subject: Opposition to File No. 251211 – Urban Forestry Amendments
Date: Friday, December 19, 2025 1:43:02 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Opposition to File No. 251211 – Urban Forestry Amendments

I am writing in strong opposition to the proposed amendments in **File No. 251211**, which would weaken San Francisco's urban forestry protections by:

- Allowing developers to satisfy street tree requirements through in-lieu fees or undefined "alternative landscaping,"
- Exempting ADUs and JADUs from tree planting requirements,
- Eliminating the public's right to appeal tree removals initiated by City departments and commissions, and
- Replacing existing public notice requirements with online postings only.

Taken together, these changes prioritize administrative convenience over environmental sustainability, public accountability, and the long-term health and resilience of San Francisco.

1. In-Lieu Fees Will Reduce Tree Planting at a Time We Can Least Afford It

San Francisco's tree canopy is critically low—approximately **13–14%**, among the smallest of any major U.S. city. New development has become one of the *primary remaining mechanisms* through which new street trees are planted, largely because City planting capacity is chronically underfunded.

Allowing developers to opt out of planting trees by paying an in-lieu fee (currently ~$2,600 per tree) will result in **fewer trees planted, full stop**. The fee does not cover the true cost of planting, watering, and replacing trees over their three-year establishment period, nor does it compensate for lost planting opportunities when new frontages are designed to permanently preclude trees.

This shift is especially troubling given the City's ongoing fiscal crisis. With projected deficits approaching **$1 billion**, Public Works and its Urban Forestry Bureau already lack the operational capacity to convert in-lieu fees into timely, neighborhood-level plantings. Deferred payments do not cool streets, clean air, or support public health.

Exempting ADUs and JADUs further compounds this problem. While small individually, their cumulative impact on density, heat islands, and storm water runoff is significant—particularly in neighborhoods already lacking canopy.

2. Eliminating Appeals for City-Initiated Tree Removals Removes Oversight—Not Red Tape

The proposal to eliminate appeals to the Board of Appeals for tree removals undertaken by City departments does **not** meaningfully expedite housing or private development. City-initiated removals are overwhelmingly associated with public works and infrastructure projects, not private construction.

Appeals serve a critical function: they require departments to justify removals publicly and have repeatedly led to **better outcomes**, including:

- Preservation of healthy trees,
- Revised designs that accommodate both infrastructure and canopy,
- Increased replacement ratios, and
- Innovative community partnerships such as **Mission Verde**, which now serves as a model for volunteer-supported tree watering and green jobs.

Removing appeals eliminates one of the City's only effective oversight mechanisms for urban forestry decisions and creates a real risk of abuse—encouraging developers to pressure City agencies to initiate removals on their behalf, at taxpayer expense, with no public recourse.

3. Reduced Public Notice Undermines Transparency and Equity

Replacing established notice requirements with website-only postings will disproportionately exclude residents who lack reliable internet access, have language barriers, or are otherwise disconnected from digital-only processes. Tree removals affect public space, neighborhood health, and climate resilience; they warrant robust, accessible notice and public participation.

Notably, many California cities—including Beverly Hills, Mountain View, Santa Cruz, Pasadena, and others—maintain clear appeal processes for tree removals. San Francisco would be moving *backward* by eliminating them.

4. These Amendments Conflict with Climate, Equity, and Public Health Goals

Urban trees are essential infrastructure. They reduce extreme heat, filter air pollution (including wildfire smoke), manage storm water, support biodiversity, and improve mental and physical health. Weakening planting requirements and oversight contradicts the City's Climate Action Plan, General Plan sustainability goals, and stated equity commitments—particularly as climate impacts intensify statewide.

Conclusion

File No. 251211 risks accelerating canopy loss, reducing public trust, and undermining San Francisco's climate resilience at precisely the wrong moment. I urge you to reject these amendments and instead pursue policies that:

- Preserve mandatory, on-site tree planting whenever feasible,
- Maintain the public's right to appeal City-initiated tree removals,
- Strengthen—not weaken—public notice requirements, and
- Invest in scalable City–community partnerships that expand planting and watering capacity.

San Francisco needs **more trees, more accountability, and more public engagement**, not fewer of each.

Respectfully submitted,

John Nulty co-chair San Francisco Tree Campaign

https://sanfranciscotreecampaign.blogspot.com

From: Tenderloin Tree Campaign 2004
To: Board of Supervisors (BOS)
Cc: Carroll, John (BOS); Ionin, Jonas (CPC)
Subject: Opposition to File No. 251211
Date: Friday, December 19, 2025 2:00:37 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Executive Summary and Analysis of Proposed Amendments Affecting San Francisco's Tree Canopy

Overview of Proposed Amendments

The proposed amendments under review in San Francisco include two primary changes:

1. **Street Tree Planting Requirements:** Developers may satisfy street tree planting obligations by either:
   Planting trees,
   Paying an in lieu fee (currently about $2,590 per tree),
   Or providing alternative landscaping (a vaguely defined option that excludes street trees).
2. **Elimination of Public Appeals:** The public's right to appeal tree removals initiated by City departments and commissions to the Board of Appeals would be removed, making such removals final and non appealable.

Key Concerns and Critique

1. Impact on San Francisco's Tree Canopy

Reduction in Actual Tree Planting: Allowing developers to pay fees or provide alternative landscaping instead of planting trees will likely reduce the number of new trees planted. The current in lieu fee barely covers the full cost of planting and maintaining trees, including replacement of dead or damaged trees.
Undefined "Alternative Landscaping": The term is vague and explicitly excludes street trees, which means no guaranteed net gain or even maintenance of the current canopy.
Operational Capacity Limits: The City's Public Works department and its nonprofit partner, Friends of the Urban Forest (FUF), lack sufficient resources and coordination capacity to meet tree planting and maintenance goals effectively.
Watering and Maintenance Challenges: Ongoing watering for about three years after planting is critical but underfunded. The $19 million annual StreetTreeSF budget is legally restricted to maintenance of existing trees, not planting or watering new ones, limiting successful establishment of new trees.

2. Elimination of Public Appeals for City-Initiated Tree Removals

Loss of Oversight and Accountability: Removing the public's right to appeal tree removals initiated by City departments eliminates an important check on City actions, reducing transparency and public input.
No Real Efficiency Gain: Appeals currently take 6-8 weeks and are not a significant bottleneck to development. Eliminating appeals does not meaningfully expedite projects but removes public scrutiny.
Risk of Corruption and Reduced Public Input: Without appeals, developers might pressure the City to remove trees on public land to avoid scrutiny, shifting costs to taxpayers and reducing transparency.

Context: Importance of Urban Trees in San Francisco

Critical Role of Urban Forests: Urban trees contribute significantly to climate resilience, public health, and social equity by reducing urban heat, improving air quality, and enhancing community well-being.
San Francisco's Tree Canopy Status: The city's tree canopy covers about 13.7% of the urban area, one of the smallest among major U.S. cities. Protections mainly cover street trees and significant trees near sidewalks; trees in parks and private yards are largely unregulated.
Historical Policy Changes: Before 2017, property owners maintained street trees, limiting growth due to cost concerns. Proposition E (2017) shifted maintenance responsibility to Public Works with a dedicated budget, but this funding cannot be used for planting or watering new trees, only for maintenance and sidewalk repairs.

Financial and Operational Realities

Aspect	Current Situation	Impact of Proposed Amendments
In Lieu Fee Amount	Approximately $2,590 per tree, barely covers planting and watering costs	Encourages fee payment over actual planting, reducing canopy growth
Tree Planting Funding	Patchwork, unreliable, mostly volunteer-driven	No new dedicated funding; watering remains a bottleneck
	Limited Public	Increased demand without

Operational Capacity	Works and FUF resources	capacity increase will hinder planting efforts
Public Oversight	Board of Appeals hears appeals on tree removals	Eliminating appeals removes public checks and balances

Answers to Your Specific Questions

What are the proposed alternatives?

Developers can satisfy street tree planting requirements by:
Planting trees,
Paying an in lieu fee,
Or providing “alternative landscaping,” a vaguely defined option that excludes street trees and does not guarantee canopy growth.

How much is the in lieu fee?

The in lieu fee is currently approximately $2,590 per tree.

What is the current tree canopy percentage?

San Francisco’s urban tree canopy is approximately 13.7%, one of the lowest among major U.S. cities.

Who is FUF?

Friends of the Urban Forest (FUF) is a nonprofit partner organization that collaborates with the City’s Public Works department to plant and maintain urban trees in San Francisco. FUF plays a critical role in volunteer-driven tree planting and maintenance efforts but faces resource constraints.

Opposition Points and Broader Concerns

The amendments prioritize development efficiency over environmental sustainability, public accountability, and the long-term health of San Francisco’s urban forest.
Exempting accessory dwelling units (ADUs) from tree planting requirements ignores their cumulative impact on urban density and environmental quality.
The elimination of public appeals and reduction of public notices to online postings only reduces transparency and public participation, disproportionately affecting vulnerable and digitally disconnected communities.
Other California cities maintain robust appeal processes for tree removals,

fostering community trust and preventing arbitrary removals.
Given San Francisco’s budget deficits and climate challenges, weakening tree protections risks exacerbating urban heat islands, storm water runoff, biodiversity loss, and public health issues.

Potential Alternatives and Solutions (Brief Mention)

The document suggests exploring balanced policy solutions that support both expedited development and urban canopy growth.
Possible approaches include:
- Increasing the in lieu fee to reflect true planting and maintenance costs,
- Defining and incentivizing meaningful alternative landscaping that includes canopy benefits,
- Securing dedicated funding for planting and watering new trees,
- Maintaining public appeal rights to ensure transparency and accountability,
- Enhancing operational capacity of Public Works and FUF through increased funding and coordination.

Conclusion

The proposed amendments, as currently drafted, pose significant risks to San Francisco’s urban tree canopy by reducing actual tree planting, weakening public oversight, and failing to address critical operational and financial challenges. The elimination of public appeals undermines transparency and accountability without delivering meaningful efficiency gains. A more nuanced and balanced approach is essential to protect and grow San Francisco’s urban forest while supporting sustainable development.

The in lieu fee in San Francisco is currently set at approximately **$2,590 per tree**. This fee is designed to cover the city's estimated cost to plant and water a tree for three years. The rationale behind the fee is to allow developers to pay this amount instead of planting trees directly, with the city then responsible for planting and maintaining trees elsewhere.

However, this fee has been criticized as barely sufficient to cover the full costs involved, including planting, watering, and maintaining the trees over time. Because of this, there is concern that allowing developers to pay the fee instead of planting trees on-site may reduce the overall number of new trees planted and hinder the growth of San Francisco’s urban canopy.
The fee is part of a broader discussion about balancing development needs with environmental sustainability and urban forestry goals in the city.

Improving operational capacity for urban tree planting and maintenance in San Francisco involves addressing several key challenges related to resources, coordination, funding, and community engagement. Here are detailed strategies that could enhance the city’s ability to effectively plant and maintain its urban forest:

1. Increase Dedicated Funding and Resources

Secure New Funding Streams: Establish dedicated budgets specifically for tree planting and post-planting care (watering, pruning, replacement). Current funds like the $19 million Street Tree SF budget are restricted to maintenance of existing trees, limiting new planting efforts.
Leverage Grants and Partnerships: Pursue grants from state and federal environmental programs, climate resilience funds, and private foundations to supplement city budgets.
Expand Staffing: Increase the number of trained arborists, horticulturists, and maintenance crews within Public Works and partner organizations like Friends of the Urban Forest (FUF).

2. Enhance Coordination and Project Management

Centralized Urban Forestry Unit: Create or strengthen a dedicated urban forestry division within Public Works with clear responsibility for planting, maintenance, and community outreach.
Cross-Department Collaboration: Improve coordination between Public Works, Recreation and Parks, Planning, and other relevant departments to streamline tree-related projects and avoid duplication or gaps.
Use of Technology: Implement GIS mapping, tree inventory databases, and project management software to track tree locations, health, watering schedules, and maintenance needs efficiently.

3. Improve Watering and Maintenance Capacity

Innovative Watering Solutions: Invest in irrigation infrastructure such as drip irrigation, rainwater harvesting, and smart watering systems to reduce labor and water use.
Volunteer and Community Programs: Expand volunteer watering programs and community stewardship initiatives, providing training and resources to residents and neighborhood groups.
Contractor Partnerships: Develop long-term contracts with specialized tree care companies to ensure consistent and professional maintenance services.

4. Policy and Regulatory Support

Adjust In Lieu Fees: Increase fees to reflect true costs of planting and maintenance, ensuring funds are sufficient to support operational needs.
Mandate Developer Contributions: Require developers to contribute not only planting fees but also ongoing maintenance funding or services.
Enforce Planting Requirements: Limit or carefully regulate alternatives to tree planting to ensure canopy growth goals are met.

5. Public Engagement and Education

Awareness Campaigns: Educate the public on the importance of urban trees and

how they can participate in planting and maintenance.
Community Partnerships: Collaborate with nonprofits, schools, and neighborhood groups to foster local stewardship and expand capacity.

Summary

Improving operational capacity requires a multifaceted approach combining increased funding, enhanced coordination, technological support, innovative maintenance practices, stronger policies, and active community involvement. These measures will help San Francisco meet its urban forestry goals, ensuring sustainable growth and health of its tree canopy amid development pressures and environmental challenges.

Improving operational capacity for urban tree planting and maintenance in San Francisco involves addressing several key challenges related to resources, coordination, funding, and community engagement. Here are detailed strategies that could enhance the city's ability to effectively plant and maintain its urban forest:

How much funding is needed?

To effectively support San Francisco's urban forestry goals, including planting, watering, maintenance, and staffing, recent estimates indicate that a fully funded citywide urban forestry program would require about $20 million annually. This level of funding is necessary to overcome current resource constraints and ensure sustainable growth and health of the city's tree canopy.

From: Wong, Jocelyn (BOS)
To: Carroll, John (BOS)
Subject: FW: Opposition to File No. 251211 – Urban Forestry Amendments
Date: Monday, December 29, 2025 8:40:15 AM

Not sure if you received this..

Best regards,
Jocelyn Wong
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
T: 415.554.7702 | F: 415.554.5163
jocelyn.wong@sfgov.org | www.sfbos.org

(VIRTUAL APPOINTMENTS) To schedule a "virtual" meeting with me (on Microsoft Teams), please ask and I can answer your questions in real time.

Due to the current COVID-19 health emergency and the Shelter in Place Order, the Office of the Clerk of the Board is working remotely while providing complete access to the legislative process and our services

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-----Original Message-----
From: San Francisco Tree Campaign <sftreecampaign@gmail.com>
Sent: Friday, December 19, 2025 1:43 PM
To: Board of Supervisors (BOS) <board.of.supervisors@sfgov.org>
Cc: Carroll, John (BOS) <john.carroll@sfgov.org>; Ionin, Jonas (CPC) <jonas.ionin@sfgov.org>
Subject: Opposition to File No. 251211 – Urban Forestry Amendments

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Opposition to File No. 251211 – Urban Forestry Amendments

I am writing in strong opposition to the proposed amendments in File No. 251211, which would weaken San Francisco's urban forestry protections by:

* Allowing developers to satisfy street tree requirements through in-lieu fees or undefined "alternative landscaping,"
* Exempting ADUs and JADUs from tree planting requirements,
* Eliminating the public's right to appeal tree removals initiated by City departments and commissions, and
* Replacing existing public notice requirements with online postings only.

Taken together, these changes prioritize administrative convenience over environmental sustainability, public accountability, and the long-term health and resilience of San Francisco.

1. In-Lieu Fees Will Reduce Tree Planting at a Time We Can Least Afford It

San Francisco's tree canopy is critically low—approximately 13–14%, among the smallest of any major U.S. city. New development has become one of the primary remaining mechanisms through which new street trees are planted, largely because City planting capacity is chronically underfunded.

Allowing developers to opt out of planting trees by paying an in-lieu fee (currently ~$2,600 per tree) will result in fewer trees planted, full stop. The fee does not cover the true cost of planting, watering, and replacing trees over their three-year establishment period, nor does it compensate for lost planting opportunities when new frontages are designed to permanently preclude trees.

This shift is especially troubling given the City's ongoing fiscal crisis. With projected deficits approaching $1 billion, Public Works and its Urban Forestry Bureau already lack the operational capacity to convert in-lieu fees into timely, neighborhood-level plantings. Deferred payments do not cool streets, clean air, or support public health.

Exempting ADUs and JADUs further compounds this problem. While small individually, their cumulative impact on density, heat islands, and storm water runoff is significant—particularly in neighborhoods already lacking canopy.

2. Eliminating Appeals for City-Initiated Tree Removals Removes Oversight—Not Red Tape

The proposal to eliminate appeals to the Board of Appeals for tree removals undertaken by City departments does not meaningfully expedite housing or private development. City-initiated removals are overwhelmingly associated with public works and infrastructure projects, not private construction.

Appeals serve a critical function: they require departments to justify removals publicly and have repeatedly led to better outcomes, including:

* Preservation of healthy trees,
* Revised designs that accommodate both infrastructure and canopy,
* Increased replacement ratios, and
* Innovative community partnerships such as Mission Verde, which now serves as a model for volunteer-supported tree watering and green jobs.

Removing appeals eliminates one of the City's only effective oversight mechanisms for urban forestry decisions and creates a real risk of abuse—encouraging developers to pressure City agencies to initiate removals on their behalf, at taxpayer expense, with no public recourse.

3. Reduced Public Notice Undermines Transparency and Equity

Replacing established notice requirements with website-only postings will disproportionately exclude residents who lack reliable internet access, have language barriers, or are otherwise disconnected from digital-only processes. Tree removals affect public space, neighborhood health, and climate resilience; they warrant robust, accessible notice and public participation.

Notably, many California cities—including Beverly Hills, Mountain View, Santa Cruz, Pasadena, and others—maintain clear appeal processes for tree removals. San Francisco would be moving backward by eliminating them.

4. These Amendments Conflict with Climate, Equity, and Public Health Goals

Urban trees are essential infrastructure. They reduce extreme heat, filter air pollution (including wildfire smoke), manage storm water, support biodiversity, and improve mental and physical health. Weakening planting requirements and oversight contradicts the City's Climate Action Plan, General Plan sustainability goals, and stated equity commitments—particularly as climate impacts intensify statewide.

Conclusion

File No. 251211 risks accelerating canopy loss, reducing public trust, and undermining San Francisco's climate resilience at precisely the wrong moment. I urge you to reject these amendments and instead pursue policies that:

* Preserve mandatory, on-site tree planting whenever feasible,
* Maintain the public's right to appeal City-initiated tree removals,
* Strengthen—not weaken—public notice requirements, and
* Invest in scalable City–community partnerships that expand planting and watering capacity.

San Francisco needs more trees, more accountability, and more public engagement, not fewer of each.

Respectfully submitted,

John Nulty co-chair San Francisco Tree Campaign

https://sanfranciscotreecampaign.blogspot.com
<https://url.avanan.click/v2/r01/__https://sanfranciscotreecampaign.blogspot.com___YXAzOnNmZHQyOmF6bzpiMGMyNzU4OWY4NmE4ZTUzY2E1NjMwOGJhY2YyYzc2Yjo3OjEwMjc6OTliZmUzOThlZGZkM2Y0NDhkYzRmZDlbZThhNjYxYmYxNzI2Y2QxZmEwOTY4NmQ4ZWQzYzMyOGM3NWUwMzE4NTpoOlQ6Tg>

From: Tenderloin Tree Campaign 2004
To: Board of Supervisors (BOS)
Cc: Carroll, John (BOS); Ionin, Jonas (CPC)
Subject: Opposition to File No. 251211
Date: Friday, December 19, 2025 2:00:36 PM

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Executive Summary and Analysis of Proposed Amendments Affecting San Francisco's Tree Canopy

Overview of Proposed Amendments

The proposed amendments under review in San Francisco include two primary changes:

1. **Street Tree Planting Requirements:** Developers may satisfy street tree planting obligations by either:
   Planting trees,
   Paying an in lieu fee (currently about $2,590 per tree),
   Or providing alternative landscaping (a vaguely defined option that excludes street trees).
2. **Elimination of Public Appeals:** The public's right to appeal tree removals initiated by City departments and commissions to the Board of Appeals would be removed, making such removals final and non appealable.

Key Concerns and Critique

1. Impact on San Francisco's Tree Canopy

Reduction in Actual Tree Planting: Allowing developers to pay fees or provide alternative landscaping instead of planting trees will likely reduce the number of new trees planted. The current in lieu fee barely covers the full cost of planting and maintaining trees, including replacement of dead or damaged trees.
Undefined "Alternative Landscaping": The term is vague and explicitly excludes street trees, which means no guaranteed net gain or even maintenance of the current canopy.
Operational Capacity Limits: The City's Public Works department and its nonprofit partner, Friends of the Urban Forest (FUF), lack sufficient resources and coordination capacity to meet tree planting and maintenance goals effectively.
Watering and Maintenance Challenges: Ongoing watering for about three years after planting is critical but underfunded. The $19 million annual StreetTreeSF budget is legally restricted to maintenance of existing trees, not planting or watering new ones, limiting successful establishment of new trees.

2. Elimination of Public Appeals for City-Initiated Tree Removals

Loss of Oversight and Accountability: Removing the public's right to appeal tree removals initiated by City departments eliminates an important check on City actions, reducing transparency and public input.
No Real Efficiency Gain: Appeals currently take 6-8 weeks and are not a significant bottleneck to development. Eliminating appeals does not meaningfully expedite projects but removes public scrutiny.
Risk of Corruption and Reduced Public Input: Without appeals, developers might pressure the City to remove trees on public land to avoid scrutiny, shifting costs to taxpayers and reducing transparency.

Context: Importance of Urban Trees in San Francisco

Critical Role of Urban Forests: Urban trees contribute significantly to climate resilience, public health, and social equity by reducing urban heat, improving air quality, and enhancing community well-being.
San Francisco's Tree Canopy Status: The city's tree canopy covers about 13.7% of the urban area, one of the smallest among major U.S. cities. Protections mainly cover street trees and significant trees near sidewalks; trees in parks and private yards are largely unregulated.
Historical Policy Changes: Before 2017, property owners maintained street trees, limiting growth due to cost concerns. Proposition E (2017) shifted maintenance responsibility to Public Works with a dedicated budget, but this funding cannot be used for planting or watering new trees, only for maintenance and sidewalk repairs.

Financial and Operational Realities

Aspect	Current Situation	Impact of Proposed Amendments
In Lieu Fee Amount	Approximately $2,590 per tree, barely covers planting and watering costs	Encourages fee payment over actual planting, reducing canopy growth
Tree Planting Funding	Patchwork, unreliable, mostly volunteer-driven	No new dedicated funding; watering remains a bottleneck
	Limited Public	Increased demand without

Operational Capacity	Works and FUF resources	capacity increase will hinder planting efforts
Public Oversight	Board of Appeals hears appeals on tree removals	Eliminating appeals removes public checks and balances

Answers to Your Specific Questions

What are the proposed alternatives?

Developers can satisfy street tree planting requirements by:
Planting trees,
Paying an in lieu fee,
Or providing “alternative landscaping,” a vaguely defined option that excludes street trees and does not guarantee canopy growth.

How much is the in lieu fee?

The in lieu fee is currently approximately $2,590 per tree.

What is the current tree canopy percentage?

San Francisco’s urban tree canopy is approximately 13.7%, one of the lowest among major U.S. cities.

Who is FUF?

Friends of the Urban Forest (FUF) is a nonprofit partner organization that collaborates with the City’s Public Works department to plant and maintain urban trees in San Francisco. FUF plays a critical role in volunteer-driven tree planting and maintenance efforts but faces resource constraints.

Opposition Points and Broader Concerns

The amendments prioritize development efficiency over environmental sustainability, public accountability, and the long-term health of San Francisco’s urban forest.
Exempting accessory dwelling units (ADUs) from tree planting requirements ignores their cumulative impact on urban density and environmental quality.
The elimination of public appeals and reduction of public notices to online postings only reduces transparency and public participation, disproportionately affecting vulnerable and digitally disconnected communities.
Other California cities maintain robust appeal processes for tree removals,

fostering community trust and preventing arbitrary removals.
Given San Francisco’s budget deficits and climate challenges, weakening tree protections risks exacerbating urban heat islands, storm water runoff, biodiversity loss, and public health issues.

Potential Alternatives and Solutions (Brief Mention)

The document suggests exploring balanced policy solutions that support both expedited development and urban canopy growth.
Possible approaches include:
- Increasing the in lieu fee to reflect true planting and maintenance costs,
- Defining and incentivizing meaningful alternative landscaping that includes canopy benefits,
- Securing dedicated funding for planting and watering new trees,
- Maintaining public appeal rights to ensure transparency and accountability,
- Enhancing operational capacity of Public Works and FUF through increased funding and coordination.

Conclusion

The proposed amendments, as currently drafted, pose significant risks to San Francisco’s urban tree canopy by reducing actual tree planting, weakening public oversight, and failing to address critical operational and financial challenges. The elimination of public appeals undermines transparency and accountability without delivering meaningful efficiency gains. A more nuanced and balanced approach is essential to protect and grow San Francisco’s urban forest while supporting sustainable development.

The in lieu fee in San Francisco is currently set at approximately **$2,590 per tree**. This fee is designed to cover the city's estimated cost to plant and water a tree for three years. The rationale behind the fee is to allow developers to pay this amount instead of planting trees directly, with the city then responsible for planting and maintaining trees elsewhere.

However, this fee has been criticized as barely sufficient to cover the full costs involved, including planting, watering, and maintaining the trees over time. Because of this, there is concern that allowing developers to pay the fee instead of planting trees on-site may reduce the overall number of new trees planted and hinder the growth of San Francisco’s urban canopy.
The fee is part of a broader discussion about balancing development needs with environmental sustainability and urban forestry goals in the city.

Improving operational capacity for urban tree planting and maintenance in San Francisco involves addressing several key challenges related to resources, coordination, funding, and community engagement. Here are detailed strategies that could enhance the city’s ability to effectively plant and maintain its urban forest:

1. Increase Dedicated Funding and Resources

Secure New Funding Streams: Establish dedicated budgets specifically for tree planting and post-planting care (watering, pruning, replacement). Current funds like the $19 million Street Tree SF budget are restricted to maintenance of existing trees, limiting new planting efforts.
Leverage Grants and Partnerships: Pursue grants from state and federal environmental programs, climate resilience funds, and private foundations to supplement city budgets.
Expand Staffing: Increase the number of trained arborists, horticulturists, and maintenance crews within Public Works and partner organizations like Friends of the Urban Forest (FUF).

2. Enhance Coordination and Project Management

Centralized Urban Forestry Unit: Create or strengthen a dedicated urban forestry division within Public Works with clear responsibility for planting, maintenance, and community outreach.
Cross-Department Collaboration: Improve coordination between Public Works, Recreation and Parks, Planning, and other relevant departments to streamline tree-related projects and avoid duplication or gaps.
Use of Technology: Implement GIS mapping, tree inventory databases, and project management software to track tree locations, health, watering schedules, and maintenance needs efficiently.

3. Improve Watering and Maintenance Capacity

Innovative Watering Solutions: Invest in irrigation infrastructure such as drip irrigation, rainwater harvesting, and smart watering systems to reduce labor and water use.
Volunteer and Community Programs: Expand volunteer watering programs and community stewardship initiatives, providing training and resources to residents and neighborhood groups.
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4. Policy and Regulatory Support

Adjust In Lieu Fees: Increase fees to reflect true costs of planting and maintenance, ensuring funds are sufficient to support operational needs.
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Awareness Campaigns: Educate the public on the importance of urban trees and

how they can participate in planting and maintenance.
Community Partnerships: Collaborate with nonprofits, schools, and neighborhood groups to foster local stewardship and expand capacity.

Summary

Improving operational capacity requires a multifaceted approach combining increased funding, enhanced coordination, technological support, innovative maintenance practices, stronger policies, and active community involvement. These measures will help San Francisco meet its urban forestry goals, ensuring sustainable growth and health of its tree canopy amid development pressures and environmental challenges.

Improving operational capacity for urban tree planting and maintenance in San Francisco involves addressing several key challenges related to resources, coordination, funding, and community engagement. Here are detailed strategies that could enhance the city's ability to effectively plant and maintain its urban forest:

How much funding is needed?

To effectively support San Francisco's urban forestry goals, including planting, watering, maintenance, and staffing, recent estimates indicate that a fully funded citywide urban forestry program would require about $20 million annually. This level of funding is necessary to overcome current resource constraints and ensure sustainable growth and health of the city's tree canopy.

From: San Francisco Tree Campaign
To: Board of Supervisors (BOS)
Cc: Carroll, John (BOS); Ionin, Jonas (CPC)
Subject: Opposition to File No. 251211 – Urban Forestry Amendments
Date: Friday, December 19, 2025 1:43:04 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Opposition to File No. 251211 – Urban Forestry Amendments

I am writing in strong opposition to the proposed amendments in **File No. 251211**, which would weaken San Francisco's urban forestry protections by:

- Allowing developers to satisfy street tree requirements through in-lieu fees or undefined "alternative landscaping,"
- Exempting ADUs and JADUs from tree planting requirements,
- Eliminating the public's right to appeal tree removals initiated by City departments and commissions, and
- Replacing existing public notice requirements with online postings only.

Taken together, these changes prioritize administrative convenience over environmental sustainability, public accountability, and the long-term health and resilience of San Francisco.

1. In-Lieu Fees Will Reduce Tree Planting at a Time We Can Least Afford It

San Francisco's tree canopy is critically low—approximately **13–14%**, among the smallest of any major U.S. city. New development has become one of the *primary remaining mechanisms* through which new street trees are planted, largely because City planting capacity is chronically underfunded.

Allowing developers to opt out of planting trees by paying an in-lieu fee (currently ~$2,600 per tree) will result in **fewer trees planted, full stop**. The fee does not cover the true cost of planting, watering, and replacing trees over their three-year establishment period, nor does it compensate for lost planting opportunities when new frontages are designed to permanently preclude trees.

This shift is especially troubling given the City's ongoing fiscal crisis. With projected deficits approaching **$1 billion**, Public Works and its Urban Forestry Bureau already lack the operational capacity to convert in-lieu fees into timely, neighborhood-level plantings. Deferred payments do not cool streets, clean air, or support public health.

Exempting ADUs and JADUs further compounds this problem. While small individually, their cumulative impact on density, heat islands, and storm water runoff is significant—particularly in neighborhoods already lacking canopy.

2. Eliminating Appeals for City-Initiated Tree Removals Removes Oversight—Not Red Tape

The proposal to eliminate appeals to the Board of Appeals for tree removals undertaken by City departments does **not** meaningfully expedite housing or private development. City-initiated removals are overwhelmingly associated with public works and infrastructure projects, not private construction.

Appeals serve a critical function: they require departments to justify removals publicly and have repeatedly led to **better outcomes**, including:

- Preservation of healthy trees,
- Revised designs that accommodate both infrastructure and canopy,
- Increased replacement ratios, and
- Innovative community partnerships such as **Mission Verde**, which now serves as a model for volunteer-supported tree watering and green jobs.

Removing appeals eliminates one of the City's only effective oversight mechanisms for urban forestry decisions and creates a real risk of abuse—encouraging developers to pressure City agencies to initiate removals on their behalf, at taxpayer expense, with no public recourse.

3. Reduced Public Notice Undermines Transparency and Equity

Replacing established notice requirements with website-only postings will disproportionately exclude residents who lack reliable internet access, have language barriers, or are otherwise disconnected from digital-only processes. Tree removals affect public space, neighborhood health, and climate resilience; they warrant robust, accessible notice and public participation.

Notably, many California cities—including Beverly Hills, Mountain View, Santa Cruz, Pasadena, and others—maintain clear appeal processes for tree removals. San Francisco would be moving *backward* by eliminating them.

4. These Amendments Conflict with Climate, Equity, and Public Health Goals

Urban trees are essential infrastructure. They reduce extreme heat, filter air pollution (including wildfire smoke), manage storm water, support biodiversity, and improve mental and physical health. Weakening planting requirements and oversight contradicts the City's Climate Action Plan, General Plan sustainability goals, and stated equity commitments—particularly as climate impacts intensify statewide.

Conclusion

File No. 251211 risks accelerating canopy loss, reducing public trust, and undermining San Francisco's climate resilience at precisely the wrong moment. I urge you to reject these amendments and instead pursue policies that:

- Preserve mandatory, on-site tree planting whenever feasible,
- Maintain the public's right to appeal City-initiated tree removals,
- Strengthen—not weaken—public notice requirements, and
- Invest in scalable City–community partnerships that expand planting and watering capacity.

San Francisco needs **more trees, more accountability, and more public engagement**, not fewer of each.

Respectfully submitted,

John Nulty co-chair San Francisco Tree Campaign

https://sanfranciscotreecampaign.blogspot.com

From: Glenn Rogers
To: MelgarStaff (BOS); Board of Supervisors (BOS)
Subject: Tree Canopy
Date: Tuesday, January 13, 2026 10:55:56 AM
Attachments: Joshua Klipp Tree letter.pdf

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Hello,

Please, file my letter about the silencing of the public by City staff regarding the care of our San Francisco street trees.

Thank you,

Glenn Rogers, RLA
Landscape Architect
License 3223
email: glennmandu@mac.com
website: alderlandscapearchitecture.com
cell: 415 875 0412

January 12, 2026

From: **Alder Landscape Architecture**
Glenn Rogers, RLA
Landscape Architect
License 3223
3425 Alemany Blvd.
San Francisco, CA
94132
415 875 0412

To: **BOARD OF SUPERVISORS**

RE: TREE CANOPIES

Hello,

I was present when City staff was discussing the removal of trees because they said they were unhealthy in December 2025. Disingenuously, staff took pictures of deciduous trees in the winter pretending this was their true condition. The pictures did not represent the condition of the trees in the summer, when deciduous trees have a full canopy.

Next, an inexperienced City employee, following the advice of his superiors, claimed trees without bricks covering the bare earth where the trees where planted, causes them to fall down. Not only was this statement not true, it insults the intelligence of anyone that heard this ridiculous comment.

Lastly, a tree that was extremely healthy and out growing the confines of the tree grate to keep it upright, was proposed to be removed. This tree grate could easily be removed from the bark of the tree, to leave the tree intact. However, since the City has a war on trees, the exact opposite proposal was suggested.

We ask Supervisors to not allow the public to be silenced by the City, especially when City staff make such poor recommendations about the health and the care of our City's tree canopy. Unfortunately, San Francisco has the least number of trees of any major city. No doubt, it is because of misguided City staff suggestions like the ones made an example of here.

Thank you,

Glenn Rogers, RLA
Landscape Architect
License 3223
Email: glennmandu@mac.com

From:	Allegra Heath-Stout
To:	Carroll, John (BOS); Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS)
Subject:	Public Comment - File No. 251211 - Opposition to Appeals Ban
Date:	Sunday, January 11, 2026 1:10:00 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Chair Melgar and Members of the Land Use Committee,

Please add these comments to the official legislative file for **File No. 251211**.

As a SOMA resident, I am writing to **OPPOSE** the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining"; it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.

Furthermore, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

Please **CONTINUE** this item until these democratic and equitable protections are restored.

Sincerely,
Allegra Heath-Stout

From:	Sara Goetz
To:	Carroll, John (BOS); Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS)
Subject:	Public Comment - File No. 251211 - Opposition to Appeals Ban
Date:	Friday, January 9, 2026 2:37:24 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Chair Melgar and Members of the Land Use Committee,

Please add these comments to the official legislative file for **File No. 251211**.

I am writing to **OPPOSE** the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. While I appreciate the interest in streamlining some historically-slow processes, this legislation doesn't accomplish that. Rather, it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.

Furthermore, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

Tree cover is a proven climate-change resilience strategy and San Francisco needs to protect everyone's right to a livable city.

Please **CONTINUE** this item until these democratic and equitable protections are restored.

Sincerely,

Sara Goetz, Bernal Heights

From:	SusanW
To:	Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Carroll, John (BOS); Board of Supervisors (BOS)
Subject:	Tree removal
Date:	Thursday, January 8, 2026 10:55:56 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Chair Melgar and Members of the Land Use Committee,

Please add these comments to the official legislative file for **File No. 251211**.

I am writing to **OPPOSE** the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining"; it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.

Furthermore, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

Please **CONTINUE** this item until these democratic and equitable protections are restored.

Sincerely,

Susan Weisberg

From: lgpetty
To: Board of Supervisors (BOS); BOS-Legislative Aides; Carroll, John (BOS)
Cc: Lurie, Daniel (MYR); Segal, Ned (MYR)
Subject: Street Trees Proposal : A Constraint Removal Too Far. File 251211 Will Bring Major Harm to SF
Date: Tuesday, January 20, 2026 8:07:55 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Supervisors,

Proposed Street Trees ordinance 251211 should be withdrawn or entirely rejected, as all of its major provisions are harmful to San Francisco and its residents.

This legislation does NOT increase street tree plantings; instead it enables the removal of our tree populations where we most need them.

To allow developers to chose not to plant required trees, to allow city workers to cut down trees without real public oversight, and to ban the public's right to an Appeal hearing at the Board of Appeals...is to inflict serious, irreparable harm on residents. This proposal will make our city worse; not better.

SF's abundance of street trees is a major reason the city is breathable - making it a healthy, desirable place to live. We need to plant MORE trees on our neighborhood streets; not give permission for less.

This proposal is part of the current mania to label everything that benefits humans to be a constraint on development.

Many in City employ believe street trees are inconvenient nuisances. Many developers think tree planting responsibilities interfere with their bottom line.

I, and hundreds of thousands of San Franciscans believe the presence of trees next to, and near us -- their function and beauty -- are critically necessary for our daily lives and our very survival. Their reduction and removal will lead to a poisonous and bleak brutalist future.

The Board of Appeals is the People's Court: the last resort and most powerful place for the voices of residents to be heard. The public, through the Appeals process, has saved thousands of trees from being destroyed by over-zealous City Departments.

Adopting this proposal allowing fee-outs, unbridled removals and banning Board of Appeals hearings, would create a San Francisco future where trees are removed from streets at will and trees are confined to parks. Our air will be toxic, temperatures will rise, and our livable neighborhoods will become unlivable.

Please withdraw or reject the Street Trees proposal entirely. Preserve democratic process in San Francisco and our priceless present and future Urban Canopy.

Thank you.

Lorraine Petty
D2/D5

From: lgpetty
To: Board of Supervisors (BOS); BOS-Legislative Aides; Carroll, John (BOS)
Cc: Lurie, Daniel (MYR); Segal, Ned (MYR)
Subject: Street Trees Proposal : A Constraint Removal Too Far. File 251211 Will Bring Major Harm to SF
Date: Tuesday, January 20, 2026 8:07:54 PM

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Dear Supervisors,

Proposed Street Trees ordinance 251211 should be withdrawn or entirely rejected, as all of its major provisions are harmful to San Francisco and its residents.

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Please withdraw or reject the Street Trees proposal entirely. Preserve democratic process in San Francisco and our priceless present and future Urban Canopy.

Thank you.

Lorraine Petty
D2/D5

From: Farrah, Michael (BOS)
To: "Tracey McCormick"
Cc: MelgarStaff (BOS); Carroll, John (BOS)
Subject: RE: Save San Francisco"s trees
Date: Tuesday, January 13, 2026 10:48:19 AM

Dear Ms. McCormick,

Thank you for taking the time to submit such a detailed public comment regarding Board of Supervisors File 251211 and the proposed amendments related to street trees. We appreciate you sharing your perspective on the potential impacts to San Francisco's green infrastructure and the importance of maintaining public oversight.

At this time, Supervisor Melgar has not yet taken a position on this legislation. Our office is reviewing the proposal closely and following the discussion as it moves through the legislative process, including the concerns you raised regarding appeals, permit efficiency, and long-term impacts on neighborhood tree canopy.

I am meeting with Public Works today about the legislation.

We are grateful for residents like you who stay engaged and help inform these policy conversations, and we appreciate your participation in the public process.

Michael R. Farrah Jr.
Legislative Aide to Myrna Melgar
415-554-6520
Sign up for our Newsletter

From: Tracey McCormick <meeyowsa@yahoo.com>
Sent: Tuesday, January 13, 2026 10:08 AM
To: BoardofAppeals (PAB) <boardofappeals@sfgov.org>
Cc: Ben.White@sfgov.org; ChanStaff (BOS) <chanstaff@sfgov.org>; ChenStaff <ChenStaff@sfgov.org>; DorseyStaff (BOS) <DorseyStaff@sfgov.org>; Fielder, Jackie (BOS) <Jackie.Fielder@sfgov.org>; MahmoodStaff <MahmoodStaff@sfgov.org>; MandelmanStaff (BOS) <mandelmanstaff@sfgov.org>; MelgarStaff (BOS) <melgarstaff@sfgov.org>; SauterStaff <SauterStaff@sfgov.org>; SherrillStaff <SherrillStaff@sfgov.org>; Walton, Shamann (BOS) <shamann.walton@sfgov.org>; WongStaff (BOS) <WongStaff@sfgov.org>
Subject: Save San Francisco's trees

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Commissioners, I submit this public comment in opposition to Board of Supervisors File 251211 (the street tree amendments). It's one thing to streamline permits. It's another thing to harm the minimal green infrastructure SF has. Mayor Lurie wants to allow developers to choose between planting trees, or paying an inadequate fee to the City to do it instead. This means not only do we lose trees, but developers can permanently design over spaces that

might have accommodated trees in the future.
I additionally oppose the proposal to remove the public's right to appeal City-initiated tree removals. Eliminating this right does nothing to expedite permitting for housing and development. The Board of Appeals' own FY2025 Report indicates that almost 90% of the permit appeals you heard last year had to do with building and planning permits, and less than 2% of the appeals you heard last year involved tree removal permits. Your data underscores that this proposed amendment has nothing to do with permit efficiency. Eliminating the public's right to appeal City-initiated tree removals serves only to silence the public, eliminate oversight, encourage corruption, and shut down future, innovative City-Community initiatives that have stemmed from these appeals in the past, for example, Mission Verde. Being able to appeal these permits before your Board has prevented or slowed the mass removal of trees in nearly every San Francisco neighborhood. In some instances, your scrutiny of City-initiated tree removals has caused City Departments to agree to plant more trees. Additionally, appeals of City-initiated tree removals have exposed certain abuses by City Departments, such as when San Francisco Recreation and Parks broke the law by illegally removing trees in United Nations Plaza (and admitted to you that they knowingly did so). San Francisco must do better - for its people and for its resilient green infrastructure. I thank you for your judicious work on these issues in the past, and for the opportunity to submit this public comment.

Tracey McCormick
466 Staples Avenue
San Francisco, CA 94112

From:	cala mario
To:	ChenStaff; DorseyStaff (BOS); MahmoodStaff; MandelmanStaff (BOS); MelgarStaff (BOS); SauterStaff; SherrillStaff; Walton, Shamann (BOS); WongStaff (BOS); Lurie, Daniel (MYR)
Cc:	Ionin, Jonas (CPC); Ionin, Jonas (CPC); Carroll, John (BOS)
Subject:	File 251211 (the street tree amendments)
Date:	Monday, January 12, 2026 11:27:28 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

To whom It May Concern:
I submit this public comment in opposition to Board of Supervisors File 251211 (the street tree amendments), and specifically the proposal to remove the public's right to appeal City-initiated tree removals. Eliminating this right does nothing to expedite permitting for housing and development. The Board of Appeals' own FY2025 Report indicates that almost 90% of the permit appeals you heard last year had to do with building and planning permits, and less than 2% of the appeals you heard last year involved tree removal permits.

Your data underscores that this proposed amendment has nothing to do with permit efficiency. Eliminating the public's right to appeal City-initiated tree removals serves only to silence the public, eliminate oversight, encourage corruption, and shut down future, innovative City-Community initiatives that have stemmed from these appeals in the past, for example, Mission Verde.

Being able to appeal these permits before your Board has prevented or slowed the mass removal of trees in nearly every San Francisco neighborhood. In some instances, your scrutiny of City-initiated tree removals has caused City Departments to agree to plant more trees. Additionally, appeals of City-initiated tree removals have exposed certain abuses by City Departments, such as when San Francisco Recreation and Parks broke the law by illegally removing trees in United Nations Plaza (and admitted to you that they knowingly did so).

San Francisco must do better - for its people and for its resilient green infrastructure. I thank you for your judicious work on these issues in the past, and for the opportunity to submit this public comment.

Sincerely.
Marilyn Ho
resident of district 9

From:	Russel
To:	Mahmood, Bilal (BOS); Chen, Chyanne (BOS); Melgar, Myrna (BOS)
Cc:	Carroll, John (BOS); Ionin, Jonas (CPC); CPC-Commissions Secretary; BoardofAppeals (PAB); Ben.White@sfgov.org; Russel Morine
Subject:	Keep the Appeal process for Tree Removals (File No. 251211)
Date:	Monday, January 12, 2026 7:09:45 PM
Attachments:	Keep the Appeal Process.pdf

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To: Land Use & Transportation Committee + SF Planning Commission

Fr: Russel Morine / Resident of Visitacion Valley

Re: File No. 251211 (Street Tree Ordinance). **In opposition to removing the right to appeal**

Supervisors, Planning Commissioners Jan. 12. 2026

The proposal to amend Article 16 of the Public Works Code combines two issues that are entirely unrelated. Establishing an in-lieu fee for new tree planting has no connection to eliminating the public's right to appeal departmental decisions on tree removals. **These matters deserve to be separated so they can be evaluated and deliberated on their own merits.**

Regarding the in-lieu fee, I have no strong position; its impact appears likely to be nominal either way.

However, **I strongly oppose eliminating the public's right to appeal a departmentally approved tree removal. Please reject this part of the amendment in its entirely.** It is unclear why this change is even being proposed or who stands to benefit from it.

The public's ability to request one final hearing is an **important safeguard that ensures accountability** in the City's management of our shared urban forest. For example, when multiple trees are slated for removal, the final decision should not rest solely with the same departments that initiated those removals. Without the possibility of an appeal, there would be no incentive to dialogue and possibly come to a compromise.

The Board of Appeals provides a necessary and independent check on what can at times be heavy-handed City oversight of tree removals. **Removing this avenue of appeal offers no public benefit.**

I urge you to reject this portion of the amendment.

Thank you for your time

Russel Morine

Visitacion Valley resident

To: Land Use & Transportation Committee + SF Planning Commission

Fr: Russel Morine / Resident of Visitacion Valley

Re: File No. 251211 (Street Tree Ordinance). **In opposition to removing the right to appeal**

Supervisors, Planning Commissioners **Jan. 12. 2026**

The proposal to amend Article 16 of the Public Works Code combines two issues that are entirely unrelated. Establishing an in-lieu fee for new tree planting has no connection to eliminating the public's right to appeal departmental decisions on tree removals. **These matters deserve to be separated so they can be evaluated and deliberated on their own merits.**

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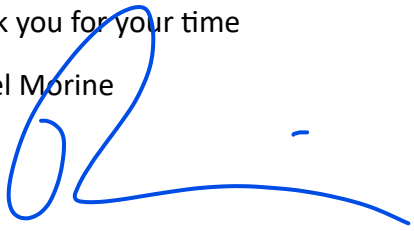
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The Board of Appeals provides a necessary and independent check on what can at times be heavy-handed City oversight of tree removals. **Removing this avenue of appeal offers no public benefit.**

I urge you to reject this portion of the amendment.

Thank you for your time

Russel Morine



Visitacion Valley resident

From:	Allegra Heath-Stout
To:	Carroll, John (BOS); Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS)
Subject:	Public Comment - File No. 251211 - Opposition to Appeals Ban
Date:	Sunday, January 11, 2026 1:10:00 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Chair Melgar and Members of the Land Use Committee,

Please add these comments to the official legislative file for **File No. 251211**.

As a SOMA resident, I am writing to **OPPOSE** the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining"; it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.

Furthermore, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

Please **CONTINUE** this item until these democratic and equitable protections are restored.

Sincerely,
Allegra Heath-Stout

From:	pmonette-shaw
To:	Mahmood, Bilal (BOS); Melgar, Myrna (BOS); Chen, Chyanne (BOS)
Cc:	Chan, Connie (BOS); Sherrill, Stephen (BOS); Sauter, Danny (BOS); Wong, Alan (BOS); Dorsey, Matt (BOS); Mandelman, Rafael (BOS); Fielder, Jackie (BOS); Walton, Shamann (BOS); Calvillo, Angela (BOS); Somera, Alisa (BOS); Carroll, John (BOS)
Subject:	Testimony on File 251211, Public Works, Administrative, Planning Codes – Street Trees
Date:	Friday, January 9, 2026 8:11:57 PM
Attachments:	Testimony to Land Use and Committee - Street Trees 2026-01-07.pdf

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Patrick Monette-Shaw

975 Sutter Street, Apt. 6
San Francisco, CA 94109
Phone: (415) 292-6969 • e-mail: pmonette-shaw@earhtlink.net

December 9, 2025

Land Use and Transportation Committee
Board of Supervisors
The Honorable Myrna Melgar, Chair
The Honorable Chyanne Chen, Member
The Honorable Bilal Mahmood, Member
1 Dr. Carlton B. Goodlett Place
San Francisco, CA 94102

> **"Reject Mayor Lurie's and Supervisor Alan Wong's proposed legislation at the Land Use and Transportation Committee eliminating street tree removal appeals to the Board of Appeals ... or face potential recall at your peril."**

Re: **Testimony on File 251211, Public Works, Administrative, Planning Codes – Street Trees**

Dear Chair Melgar, and Members of the Land Use and Transportation Committee,

Regarding File #**251211, "Public *Works, Administrative, Planning Codes – Street Trees***," I urge the Land Use and Transportation Committee to reject Mayor Lurie and freshman District 4 Supervisor Alan Wong's misguided proposal to eliminate the rights of San Franciscans from being able to appeal removal of street trees.

Our new Mayor proposed simply changing the law so that the public can no longer appeal City-initiated tree removals. Just one City Supervisor — newly appointed Supervisor Alan Wong — has signed on as a co-sponsor of the Mayor's proposed Ordinance. District 4 has a fairly skimpy tree canopy; the Planning Department's "*Street Tree Map*" map shows just 4,000 trees in Parkside and 5,616 trees in the Outer Sunset.

> **"The Land Use Committee should follow Supervisor Dorsey's lead preventing elimination of the Mission Bay TIF CAC; urge the Streamlining Task Force to keep the Urban Forestry Council and its role in supporting appeals of street tree removals!"**

The proposal to strip citizens' ability to appeal government decisions removes democratic checks and balances of San Francisco's governance, and remakes the City to allow unchecked executive and legislative rule of the citizenry. That's not why we

elected you to public office!

Supervisor Wong may not have learned his lesson after D-4 voters rose in revolt against former Supervisor Joel Engardio's support of closing the Great Highway and converting it to a park, creating traffic congestion throughout D-4. Voters were so angry they successfully recalled Engardio. Supervisor Wong is playing with fire supporting the Mayor's "*Chop 'em down*" Ordinance to deal with trees. Wong's support of the proposed Ordinance may become his *Waterloo*.

As lawyer Joshua Klipp — an environmental activist and Member of the Urban Forestry Council — just **wrote** in the *Westside Observer*, "*We live in a time when federal elected and appointed leaders routinely ignore the law, and the people's right to speak out is being systematically silenced. ... Our own City government is* [effectively] *doing the same thing: violating their own laws, then telling the public to sit down and shut up*."

Importantly, Klipp noted the Mayor's effort to remove citizen's rights to appeal tree removal doesn't impact private or commercial development; it only effects City-initiated tree removals. Removing the public's right to appeal has nothing to do with streamlining City government! Mayor Lurie and Supervisor Wong's proposal for San Francisco's street trees would be disastrous, because San Francisco already has the smallest urban canopy of any major city in the U.S.

Klipp rightly worries that this would incentivize developers to lean on the City to remove those trees on their behalf, effectively underwriting the work of tree removals for private development — using taxpayer money! (I've personally never met a developer adverse to shedding their own costs onto the backs of taxpayers, or a developer who doesn't like free City money!)

Given the $1 billion budget deficit Mayor Lurie is facing over the next two fiscal years, it is fiscally irresponsible for him to be proposing this Ordinance, which could add a significant amount of costs to the City he can't afford!

In addition to removing the public's right to appeal tree removals, Mayor Lurie's "*Commission Streamlining Task Force*" has recommended eliminating the "*Urban Forestry Council*" completely, and assigning the Forestry Council's oversight duties to the Commission on the Environment — if (a big if) the Environment Commission deigns to take on the oversight functions of the Forestry Council. The Streamlining Task Force also simultaneously recommended taking the Environment Commission out of the City Charter, moving it to the Administrative Code, and converting it from a "*regulatory body*" to an "*advisory body*," slapping a three-year sunset date on the Environment Commission, and taking budget approval authority over the Environment Department away from the Environment Commission. Applying a sunset date opens the door to the Environment Commission being shut down by the Board of Supervisors anytime in the future.

The Urban Forestry Council was created by the Board of Supervisors 22 years ago by Ordinance #171-03 in July 2003 under the "*Precautionary Principle*" to manage trees in San Francisco by emphasizing public participation in the preservation and expansion of the urban forest before causing actual environmental harm — including through illegal tree removal and greedy developers avoiding responsibility to protect and expand our urban canopy.

It was created in Chapter 12 of the **Environment Code** to manage, protect, and enhance the City's urban forest as critical and essential, high-value infrastructure. §1200(a) of the

Environment Code states that the Urban Forestry Council is "*to protect the community interest and ensure that San Francisco realizes the full range of tree benefits into the future*."

As well, the "*Urban Forestry Ordinance*" was also added as Article 16, §800 *Urban Forestry Ordinance* of the San Francisco **Public Works Code** 30 years and 6 months ago on May 19, 1995 by Board of Supervisors Ordinance #165-95. §803, *Urban Forestry Council; Additional Powers and Duties,* added duties and functions of the Urban Forestry Council to advise the Director of the Public Works Department in an advisory capacity, including paragraph §803(a)(7) on "*Making recommendations to the Director on appeals of applications for tree removal*."

After operating successfully for 22 to 30-plus years on a lean cost of just $109,000 annually, the Board of Supervisors should not allow the Commission Streamlining Task Force, Mayor Lurie, and newbie Supervisor Wong to simply eliminate the Urban Forestry Council created by Board of Supervisors Ordinance #165-95 and Ordinance #171-03.

This Land Use and Transportation Committee, and the full Board of Supervisors, should not now alter the Environment Code and Public Works Code to allow the Mayor to run roughshod over 22 to 30 years of existing precedent preserving our urban canopy!

"This Land Use and Transportation Committee should not now alter the Environment Code and Public Works Code to allow the Mayor to run roughshod over 22 to 30 years of existing precedent preserving our urban canopy!"

San Franciscans expect this Board of Supervisors to protect and preserve our rights to appeal decisions regarding removal of street trees. We have ***not*** elected this Board of Supervisors to trample on the rights of San Franciscans!

Following public pressure and advocacy, the Commission Streamlining Task Force just overturned its initial decision to eliminate the "*Reentry Council*," showing public pressure works. The Board of Supervisors should contact the Streamlining Task Force at CommissionStreamlining@sfgov.org to have it overturn its initial decision to eliminate the *Urban Forestry Council*, too!

Supervisor Matt Dorsey wrote to the Commission Streamlining Task Force January 5, 2026 requesting that the Task Force re-evaluate and overturn its initial decision to eliminate the Mission Bay Transportation Improvement Fund Community Advisory Committee (CAC). The Streamlining Task Force has placed on its January 14 meeting agenda item #5-e to reconsider it's initial decision to eliminate the Mission Bay TIF CAC. The Streamlining Task Force can — and should — do the same with the Urban Forestry Council.

The Land Use Committee should follow Supervisor Dorsey's lead preventing elimination of the Mission Bay TIF CAC; urge the Streamlining Task Force to keep the Urban Forestry Council and its role supporting appeals of tree removals!

Just as Supervisor Dorsey believes the *Mission Bay CAC* has provided valuable transparency and community-based advocacy, the same applies to the "*Urban Forestry Council*" — just as it applies to the "*Reentry Council*." The Streamlining Task Force has listened to reason before and rescinded its previous wrongful decisions. It should do the same with the Urban Forestry Council, and the Board of Supervisors have a fiduciary duty to do so by writing to the Task Force expressing your displeasure.

As Dorsey wrote on January 5: "*The Mission Bay*

TIF CAC is working as intended." So, too, is the Uban Forestry Council working as intended. Both bodies must be retained, just as the Reentry Council was retained.

"The proposed Ordinance states that appeals to the Board of Appeals for tree removals undertaken by City departments and commissions will be eliminated. That's just wrong to deprive San Franciscans of our right to appeal poor Planning Department decisions to the Board of Appeals!

Any District Supervisor who signs on as a co-sponsor of the Mayor's tree removal legislation should face recall from office, just as Joel Engardio was recalled."

The proposed Ordinance states that appeals to the Board of Appeals for tree removals undertaken by City departments and commissions will be eliminated. That's just wrong to deprive San Franciscans of our right to appeal poor Planning Department decisions to the Board of Appeals.

When the Land Use Committee holds a hearing on this proposed legislation, I urge the Committee to reject it and forward a negative Recommendation to the full Board of Supervisors. You should recommend the Mayor's proposed Ordinance be closed without further action, for the reasons stated.

Any District Supervisor who signs on as a co-sponsor of the Mayor's tree removal legislation, or commission reform Charter change "*streamlining*" goals should face recall from office, just as Joel Engardio was recalled!

Mr. Klipp is right: "*We are expressing public opposition to overrunning another of our rights*."

One Example: 900 Block of Sutter Street

There are just seven trees on my block (900 block of Sutter Street) with diameters greater than 10 inches and taller than 30 feet. The approximate 22-foot-tall Cherry Plum (*Prunus cerasifera*) tree just in front of my building has a five-inch diameter trunk, and is already over 20 years old; it's nearing the end of its short-lived life cycle. I remember when my former landlord planted it 22 years ago, shortly after he had purchased this building and pulled an owner move-in eviction on me. (Luckily there was an empty unit he had to let me move into.)

My neighbors and I don't want any trees removed on our block on Sutter Street because the urban canopy on our street is already very sparse, with very little shade!

That Don Lewis, a planner in the Planning Department issued a "*determination*" on December 22, 2025 that the proposed Ordinance is *"Not defined as a project under CEQA Guidelines Sections 15378 and 15060(c)(2) because it would not result in a direct or indirect physical change in the environment*" is just Orwellian logic at best, or at worst Kafkaesque (think Kafka's "*The Trial"*). Obviously, removing street trees and the urban canopy do, in fact, directly change our urban environment physically! Lewis appears to be severely, and professionally, myopic.

Was Mr. Lewis just placing a *bah humbug!* lump of coal in Santa Claus's Christmas stocking on December 22?

Respectfully submitted,

/s/

Patrick Monette-Shaw
Columnist/Reporter
Westside Observer Newspaper

cc: Supervisor Raphael Mandelman, President, Board of Supervisors
The Honorable Connie Chan, Supervisor, District 1
The Honorable Stephen Sherrill, Supervisor, District 2
The Honorable Danny Sauter, Supervisor, District 3
The Honorable Alan Wong, Supervisor, District 4
The Honorable Matt Dorsey, Supervisor, District 6
The Honorable Jackie Fielder, Supervisor, District 9
The Honorable Shamann Walton, Supervisor, District 10
Angela Calvillo, Clerk of the Board
Alisa Somera, Legislative Deputy Director, Clerk of the Board's Office
John Carroll, Land Use and Transportation Committee Clerk
Board of Appeals

Patrick Monette-Shaw

975 Sutter Street, Apt. 6
San Francisco, CA 94109
Phone: (415) 292-6969 • e-mail: pmonette-shaw@earhtlink.net

December 9, 2025

Land Use and Transportation Committee
Board of Supervisors
The Honorable Myrna Melgar, Chair
The Honorable Chyanne Chen, Member
The Honorable Bilal Mahmood, Member
1 Dr. Carlton B. Goodlett Place
San Francisco, CA 94102

"Reject Mayor Lurie's and Supervisor Alan Wong's proposed legislation at the Land Use and Transportation Committee eliminating street tree removal appeals to the Board of Appeals … or face potential recall at your peril."

Re: **Testimony on File 251211, Public Works, Administrative, Planning Codes – Street Trees**

Dear Chair Melgar, and Members of the Land Use and Transportation Committee,

Regarding File #**251211, "Public *Works, Administrative, Planning Codes – Street Trees***," I urge the Land Use and Transportation Committee to reject Mayor Lurie and freshman District 4 Supervisor Alan Wong's misguided proposal to eliminate the rights of San Franciscans from being able to appeal removal of street trees.

Our new Mayor proposed simply changing the law so that the public can no longer appeal City-initiated tree removals. Just one City Supervisor — newly appointed Supervisor Alan Wong — has signed on as a co-sponsor of the Mayor's proposed Ordinance. District 4 has a fairly skimpy tree canopy; the Planning Department's "*Street Tree Map*" map shows just 4,000 trees in Parkside and 5,616 trees in the Outer Sunset.

The proposal to strip citizens' ability to appeal government decisions removes democratic checks and balances of San Francisco's governance, and remakes the City to allow unchecked executive and legislative rule of the citizenry. That's not why we elected you to public office!

"The Land Use Committee should follow Supervisor Dorsey's lead preventing elimination of the Mission Bay TIF CAC; urge the Streamlining Task Force to keep the Urban Forestry Council and its role in supporting appeals of street tree removals!"

Supervisor Wong may not have learned his lesson after D-4 voters rose in revolt against former Supervisor Joel Engardio's support of closing the Great Highway and converting it to a park, creating traffic congestion throughout D-4. Voters were so angry they successfully recalled Engardio. Supervisor Wong is playing with fire supporting the Mayor's "*Chop 'em down*" Ordinance to deal with trees. Wong's support of the proposed Ordinance may become his *Waterloo*.

As lawyer Joshua Klipp — an environmental activist and Member of the Urban Forestry Council — just **wrote** in the *Westside Observer*, "*We live in a time when federal elected and appointed leaders routinely ignore the law, and the people's right to speak out is being systematically silenced. … Our own City government is* [effectively] *doing the same thing: violating their own laws, then telling the public to sit down and shut up*."

Importantly, Klipp noted the Mayor's effort to remove citizen's rights to appeal tree removal doesn't impact private or commercial development; it only effects City-initiated tree removals. Removing the public's right to appeal has nothing to do with streamlining City government! Mayor Lurie and Supervisor Wong's proposal for San Francisco's street trees would be disastrous, because San Francisco already has the smallest urban canopy of any major city in the U.S.

Klipp rightly worries that this would incentivize developers to lean on the City to remove those trees on their behalf, effectively underwriting the work of tree removals for private development — using taxpayer money! (I've personally never met a developer adverse to shedding their own costs onto the backs of taxpayers, or a developer who doesn't like free City money!)

Given the $1 billion budget deficit Mayor Lurie is facing over the next two fiscal years, it is fiscally irresponsible for him to be proposing this Ordinance, which could add a significant amount of costs to the City he can't afford!

In addition to removing the public's right to appeal tree removals, Mayor Lurie's "*Commission Streamlining Task Force*" has recommended eliminating the "*Urban Forestry Council*" completely, and assigning the Forestry Council's oversight duties to the Commission on the Environment — if (a big if) the Environment Commission deigns to take on the oversight functions of the Forestry Council. The Streamlining Task Force also simultaneously recommended taking the Environment Commission out of the City Charter, moving it to the Administrative Code, and converting it from a "*regulatory body*" to an "*advisory body*," slapping a three-year sunset date on the Environment Commission, and taking budget approval authority over the Environment Department away from the Environment Commission. Applying a sunset date opens the door to the Environment Commission being shut down by the Board of Supervisors anytime in the future.

The Urban Forestry Council was created by the Board of Supervisors 22 years ago by Ordinance #171-03 in July 2003 under the "*Precautionary Principle*" to manage trees in San Francisco by emphasizing public participation in the preservation and expansion of the urban forest before causing actual environmental harm — including through illegal tree removal and greedy developers avoiding responsibility to protect and expand our urban canopy.

It was created in Chapter 12 of the **Environment Code** to manage, protect, and enhance the City's urban forest as critical and essential, high-value infrastructure. §1200(a) of the Environment Code states that the Urban Forestry Council is "*to protect the community interest and ensure that San Francisco realizes the full range of tree benefits into the future*."

As well, the "*Urban Forestry Ordinance*" was also added as Article 16, §800 *Urban Forestry Ordinance* of the San Francisco **Public Works Code** 30 years and 6 months ago on May 19, 1995 by Board of Supervisors Ordinance #165-95. §803, *Urban Forestry Council; Additional Powers and Duties,* added duties and functions of the Urban Forestry Council to advise the Director of the Public Works Department in an advisory capacity, including paragraph §803(a)(7) on "*Making recommendations to the Director on appeals of applications for tree removal*."

After operating successfully for 22 to 30-plus years on a lean cost of just $109,000 annually, the Board of Supervisors should not allow the Commission Streamlining Task Force, Mayor Lurie, and newbie Supervisor Wong to simply eliminate the Urban Forestry Council created by Board of Supervisors Ordinance #165-95 and Ordinance #171-03.

This Land Use and Transportation Committee, and the full Board of Supervisors, should not now alter the Environment Code and Public Works Code to allow the Mayor to run roughshod over 22 to 30 years of existing precedent preserving our urban canopy!

"This Land Use and Transportation Committee should not now alter the Environment Code and Public Works Code to allow the Mayor to run roughshod over 22 to 30 years of existing precedent preserving our urban canopy!"

San Franciscans expect this Board of Supervisors to protect and preserve our rights to appeal decisions regarding removal of street trees. We have ***not*** elected this Board of Supervisors to trample on the rights of San Franciscans!

Following public pressure and advocacy, the Commission Streamlining Task Force just overturned its initial decision to eliminate the "*Reentry Council*," showing public pressure works. The Board of Supervisors should contact the Streamlining Task Force at CommissionStreamlining@sfgov.org to have it overturn its initial decision to eliminate the *Urban Forestry Council*, too!

Supervisor Matt Dorsey wrote to the Commission Streamlining Task Force January 5, 2026 requesting that the Task Force re-evaluate and overturn its initial decision to eliminate the Mission Bay Transportation Improvement Fund Community Advisory Committee (CAC). The Streamlining Task Force has placed on its January 14 meeting agenda item #5-e to reconsider it's initial decision to eliminate the Mission Bay TIF CAC. The Streamlining Task Force can — and should — do the same with the Urban Forestry Council.

The Land Use Committee should follow Supervisor Dorsey's lead preventing elimination of the Mission Bay TIF CAC; urge the Streamlining Task Force to keep the Urban Forestry Council and its role supporting appeals of tree removals!

Just as Supervisor Dorsey believes the *Mission Bay CAC* has provided valuable transparency and community-based advocacy, the same applies to the "*Urban Forestry Council*" — just as it applies to the "*Reentry Council*." The Streamlining Task Force has listened to reason before and rescinded its previous wrongful decisions. It should do the same with the Urban Forestry Council, and the Board of Supervisors have a fiduciary duty to do so by writing to the Task Force expressing your displeasure.

As Dorsey wrote on January 5: "*The Mission Bay TIF CAC is working as intended*." So, too, is the Uban Forestry Council working as intended. Both bodies must be retained, just as the Reentry Council was retained.

The proposed Ordinance states that appeals to the Board of Appeals for tree removals undertaken by City departments and commissions will be eliminated. That's just wrong to deprive San Franciscans of our right to appeal poor Planning Department decisions to the Board of Appeals.

When the Land Use Committee holds a hearing on this proposed legislation, I urge the Committee to reject it and forward a negative Recommendation to the full Board of Supervisors. You should recommend the Mayor's proposed Ordinance be closed without further action, for the reasons stated.

Any District Supervisor who signs on as a co-sponsor of the Mayor's tree removal legislation, or commission reform Charter change "*streamlining*" goals should face recall from office, just as Joel Engardio was recalled!

"The proposed Ordinance states that appeals to the Board of Appeals for tree removals undertaken by City departments and commissions will be eliminated. That's just wrong to deprive San Franciscans of our right to appeal poor Planning Department decisions to the Board of Appeals!

Any District Supervisor who signs on as a co-sponsor of the Mayor's tree removal legislation should face recall from office, just as Joel Engardio was recalled."

Mr. Klipp is right: "*We are expressing public opposition to overrunning another of our rights*."

One Example: 900 Block of Sutter Street

There are just seven trees on my block (900 block of Sutter Street) with diameters greater than 10 inches and taller than 30 feet. The approximate 22-foot-tall Cherry Plum (*Prunus cerasifera*) tree just in front of my building has a five-inch diameter trunk, and is already over 20 years old; it's nearing the end of its short-lived life cycle. I remember when my former landlord planted it 22 years ago, shortly after he had purchased this building and pulled an owner move-in eviction on me. (Luckily there was an empty unit he had to let me move into.)

My neighbors and I don't want any trees removed on our block on Sutter Street because the urban canopy on our street is already very sparse, with very little shade!

That Don Lewis, a planner in the Planning Department issued a "*determination*" on December 22, 2025 that the proposed Ordinance is *"Not defined as a project under CEQA Guidelines Sections 15378 and 15060(c)(2) because it would not result in a direct or indirect physical change in the environment*" is just Orwellian logic at best, or at worst Kafkaesque (think Kafka's "*The Trial"*). Obviously, removing street trees and the urban canopy do, in fact, directly change our urban environment physically! Lewis appears to be severely, and professionally, myopic.

Was Mr. Lewis just placing a *bah humbug!* lump of coal in Santa Claus's Christmas stocking on December 22?

Respectfully submitted,

/s/
Patrick Monette-Shaw
Columnist/Reporter
Westside Observer Newspaper

cc: Supervisor Raphael Mandelman, President, Board of Supervisors
The Honorable Connie Chan, Supervisor, District 1
The Honorable Stephen Sherrill, Supervisor, District 2
The Honorable Danny Sauter, Supervisor, District 3

The Honorable Alan Wong, Supervisor, District 4
The Honorable Matt Dorsey, Supervisor, District 6
The Honorable Jackie Fielder, Supervisor, District 9
The Honorable Shamann Walton, Supervisor, District 10
Angela Calvillo, Clerk of the Board
Alisa Somera, Legislative Deputy Director, Clerk of the Board's Office
John Carroll, Land Use and Transportation Committee Clerk
Board of Appeals

From:	SF Forest
To:	Carroll, John (BOS); Melgar, Myrna (BOS); Chen, Chyanne (BOS); Mahmood, Bilal (BOS)
Cc:	Walton, Shamann (BOS); DorseyStaff (BOS); Sauter, Danny (BOS); Chan, Connie (BOS); Sherrill, Stephen (BOS); Fielder, Jackie (BOS); MandelmanStaff (BOS); WongStaff (BOS); Lurie, Daniel (MYR)
Subject:	Please reject File #251211 amending San Francisco"s Public Works Code Article 16.
Date:	Friday, January 9, 2026 4:17:43 PM
Attachments:	image.png

This message is from outside the City email system. Do not open links or attachments from untrusted sources.



Dear members of the Land Use and Transportation Committee,

Please reject File #251211 amending San Francisco's Public Works Code Article 16.

a.
Do not eliminate the public's right to appeal when a City department initiates a tree removal. This is not about housing or development. This would include, for example, when SFMTA sought to remove every tree on Van Ness (~200) for the new bus lane, when SFPW sought to remove every tree on 24th Street (~77) between Mission and Potrero, when Better Market Streets sought to remove every tree on Market Street for its new sidewalks (~700). If the public didn't have the right to appeal, these trees would be gone. Because of the appeals process, trees were saved, plans were revised, and City-community partnerships were formed.

b.
If developers are allowed to pay in-lieu-of-planting-trees fee, the fee should be much higher - sufficient for the city to do necessary planting - using developers', and not taxpayers' money, for this purpose.

Trees are very important - absorbing carbon dioxide, giving us oxygen, cleaning the air from pollution, providing habitat for wildlife.
San Francisco has the smallest urban tree canopy among comparable U.S. cities. This disastrous amendment will reduce it even further.

Protect our trees. Reject File #251211 amending San Francisco's Public Works Code Article 16.

Sincerely,

San Francisco Forest Alliance

San Francisco Forest Alliance is a 501(c)4 not-for-profit organization with a mission of **inclusive environmentalism**. We fight to protect our environment through outreach and providing information. We oppose the unnecessary destruction of trees, oppose the use of toxic herbicides in parks and public lands, and support public access to our parks and conservation of our tree canopy. We stand for transparency in the use of public funds.

From:	Anastasia Glikshtern
To:	Carroll, John (BOS); Melgar, Myrna (BOS); Chen, Chyanne (BOS); Mahmood, Bilal (BOS)
Cc:	WongStaff (BOS); Lurie, Daniel (MYR); Sauter, Danny (BOS); MandelmanStaff (BOS); Chan, Connie (BOS); DorseyStaff (BOS); ChenStaff; Fielder, Jackie (BOS); SherrillStaff; Walton, Shamann (BOS)
Subject:	Please reject File #251211 amending San Francisco"s Public Works Code Article 16.
Date:	Friday, January 9, 2026 3:41:45 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear members of the Land Use and Transportation Committee,

Please reject File #251211 amending San Francisco's Public Works Code Article 16.

It will do great harm to San Francisco's already small urban tree canopy.

1.

It is wrong to eliminate the public's right to appeal when a City department initiates a tree removal. This isn't about housing or development. It's about silencing the Public and letting City Departments remove trees with no oversight.

2.

If developers are allowed to pay in-lieu-of-planting-trees fee, the fee should be much higher - sufficient for the city to do necessary planting - using developers, and not taxpayers money, for this purpose.

The city already has the smallest urban tree canopies among comparable U.S. cities, covering only about 13.7% of the ground (around 27% is the national average). This disastrous proposal will reduce it even further. During the years many trees have been saved thanks to the appeals. Trees are very important - absorbing carbon dioxide, giving us oxygen, cleaning the air from pollution, providing habitat for wildlife.

Protect our trees. Reject File #251211 amending San Francisco's Public Works Code Article 16!

Thank you,

Anastasia Glikshtern

From:	Sara Goetz
To:	Carroll, John (BOS); Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS)
Subject:	Public Comment - File No. 251211 - Opposition to Appeals Ban
Date:	Friday, January 9, 2026 2:37:25 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Chair Melgar and Members of the Land Use Committee,

Please add these comments to the official legislative file for **File No. 251211**.

I am writing to **OPPOSE** the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. While I appreciate the interest in streamlining some historically-slow processes, this legislation doesn't accomplish that. Rather, it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.

Furthermore, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

Tree cover is a proven climate-change resilience strategy and San Francisco needs to protect everyone's right to a livable city.

Please **CONTINUE** this item until these democratic and equitable protections are restored.

Sincerely,

Sara Goetz, Bernal Heights

From:	Board of Supervisors (BOS)
To:	BOS-Supervisors; BOS-Legislative Aides
Cc:	Calvillo, Angela (BOS); Mchugh, Eileen (BOS); Ng, Wilson (BOS); Somera, Alisa (BOS); De Asis, Edward (BOS); BOS-Operations; Board of Supervisors (BOS); Carroll, John (BOS)
Subject:	File No. 251211 Street Trees - 27 letters
Date:	Thursday, January 8, 2026 12:32:53 PM
Attachments:	27 letters.pdf

Dear Supervisors,

Please see the attached 27 letters, from members of the public and various organizations, regarding:

> File No. 251211 - Ordinance amending the Public Works Code to allow development projects to satisfy street tree planting requirements through payment of an in lieu fee or providing alternative landscaping; exempt accessory dwelling units from street tree planting requirements; eliminate appeals to the Board of Appeals for tree removals undertaken by City departments and commissions; and update in lieu fee reporting requirements; amending the Administrative Code to create a separate account within the Adopt-A-Tree Fund to receive in lieu fees for street tree requirements; amending the Planning Code to update street tree applicability requirements; affirming the Planning Department's determination under the California Environmental Quality Act; making findings of consistency with the General Plan, and the eight priority policies of Planning Code, Section 101.1; and making public necessity, convenience, and welfare findings under Planning Code, Section 302.

Regards,

Richard Lagunte
Office of the Clerk of the Board
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
Voice (415) 554-5184 | Fax (415) 554-5163
bos@sfgov.org | www.sfbos.org

Pronouns: he, him, his

Disclosures: *Personal information that is provided in communications to the Board of Supervisors is subject to disclosure under the California Public Records Act and the San Francisco Sunshine Ordinance. Personal information provided will not be redacted. Members of the public are not required to provide personal identifying information when they communicate with the Board of Supervisors and its committees. All written or oral communications that members of the public submit to the Clerk's Office regarding pending legislation or hearings will be made available to all members of the public for inspection and copying. The Clerk's Office does not redact any information from these submissions. This means that personal information—including names, phone numbers, addresses and similar information that a member of the public elects to submit to the Board and its committees—may appear on the Board of Supervisors' website or in other public documents that members of the public may inspect or copy.*

From:	Shaun Aukland
To:	CPC-Commissions Secretary; Carroll, John (BOS); Dennis Phillips, Sarah (CPC)
Cc:	Ionin, Jonas (CPC); Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS)
Subject:	Opposition & CEQA Objection: File No. 251211 (Street Tree Ordinance)
Date:	Monday, January 5, 2026 12:34:38 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear President So, Chair Melgar, Supervisors, and Commissioners,

I am writing on behalf of FairTrees.org to formally oppose File No. 251211 and to object to the Planning Department's CEQA determination. Please also add this to the legislative file.

1. CEQA Objection. The legislative file states this ordinance is "Not defined as a project... because it would not result in a direct or indirect physical change in the environment." We dispute this finding. The legislation eliminates the public's right to appeal city-initiated tree removals. Historical data proves that the appeals process has successfully preserved hundreds of mature trees that the City intended to remove (e.g., Mission Verde, 24th St).

If the appeals process prevents tree removal, then removing the appeals process will logically result in the destruction of trees that otherwise would have been saved.

This will have an obvious impact to the city's physical environment. A reduction in urban canopy is a physical change to the environment that increases heat islands and reduces air quality. This requires environmental review, not an exemption. As our orgainzation has communicated before, Enivornment Justice Communities like SOMA, the Tenderloin, Bayview Hunter's Point, and others are largely *losing* canopy, not gaining it. Ongoing projects like the Folsom / Howard Streetscape projects that have removed dozens of trees, and only added marginally.

2. The "Equity" Justification is Not Defined. The "In-Lieu Fee" Loophole The bill allows developers to pay fees to plant trees in "neighborhoods with low canopy" but fails to define that term. Without a data-driven definition (like "Equity Priority Communities"), this creates a slush fund where fees generated in high-need districts like SoMa (2.7% canopy) can be diverted to wealthier areas. We have seen this **over and over**, with the federal Inflation Reduction Act grant, as well as Prop L funds. Our organization has been analyzing canopy data from US Forestry, and can provide this to make this a more data-driven process.

3. SF Citizens Lose Their Last Remaining Voice in Trees: Stripping residents of the right to appeal City decisions removes the only check and balance against administrative overreach, and eliminates due process.. This is not streamlining; it is silencing.

We urge you to CONTINUE this item until the CEQA determination is corrected and these amendments are made.

Sincerely,

Shaun Aukland
FairTrees.org

From:	Ruby Rieke
To:	Carroll, John (BOS); Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS)
Subject:	Public Comment - File No. 251211 - Opposition to Appeals Ban
Date:	Tuesday, January 6, 2026 3:30:11 PM

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Dear Chair Melgar and Members of the Land Use Committee,

Please add these comments to the official legislative file for **File No. 251211**.

I am writing to **OPPOSE** the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining"; it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.

Furthermore, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

Please **CONTINUE** this item until these democratic and equitable protections are restored.

Sincerely, Ruby Rieke Mission District

From:	Shamika Klassen
To:	Carroll, John (BOS); Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS)
Subject:	Public Comment - File No. 251211 - Opposition to Appeals Ban
Date:	Tuesday, January 6, 2026 3:31:18 PM

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Dear Chair Melgar and Members of the Land Use Committee,

Please add these comments to the official legislative file for **File No. 251211**.

I am writing to **OPPOSE** the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining"; it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.

Furthermore, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

Please **CONTINUE** this item until these democratic and equitable protections are restored.

Sincerely,

Dr. Shamika Klassen, Alamo Square Neighborhood

From:	Christine S.
To:	Carroll, John (BOS); Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS); DorseyStaff (BOS)
Subject:	Public Comment - File No. 251211 - Opposition to Appeals Ban
Date:	Tuesday, January 6, 2026 3:56:14 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Chair Melgar and Members of the Land Use Committee,

Please add these comments to the official legislative file for **File No. 251211**.

I am writing to **OPPOSE** the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining"; it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction. The City of San Francisco needs to be adding more trees to beautify the sad streets in SF. I've been trying for 5 years just to get one tree planted after a car crashed into the gorgeous healthy ficus that adorned my street in SOMA. This is shameful. A missed opportunity to have a city that deserves to showoff its natural beauty.

Furthermore, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

Please **CONTINUE** this item until these democratic and equitable protections are restored.

Sincerely,

Christine Segalas
District 6 (SOMA)

From:	Anna Papitto
To:	Carroll, John (BOS); Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS)
Subject:	Public Comment - File No. 251211 - Opposition to Appeals Ban
Date:	Tuesday, January 6, 2026 4:06:36 PM

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Dear Chair Melgar and Members of the Land Use Committee,

Please add these comments to the official legislative file for **File No. 251211**.

I am writing to **OPPOSE** the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining"; it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.

Furthermore, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

Please **CONTINUE** this item until these democratic and equitable protections are restored.

Sincerely, Anna Papitto, Noe Valley

From:	Alice Rogers
To:	Carroll, John (BOS); Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS)
Subject:	Public Comment - File No. 251211 - Opposition to Appeals Ban
Date:	Tuesday, January 6, 2026 4:21:09 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Chair Melgar and Members of the Land Use Committee,

Please add these comments to the official legislative file for **File No. 251211**.

As a decades-long tree advocate and FUF member, I am writing to **OPPOSE** the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining"; it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.

Additionally, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

Please **CONTINUE** this item until these democratic and equitable protections are restored. We need to get this right.

Respectfully,

Alice Rogers

.....

Alice Rogers
10 South Park St
Studio 2
San Francisco, CA 94107

arcomnsf@pacbell.net

From:	Abigail Kroch
To:	Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS); Carroll, John (BOS)
Subject:	Public Comment - File No. 251211 - Opposition to Appeals Ban
Date:	Tuesday, January 6, 2026 4:35:50 PM

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- Dear Chair Melgar and Members of the Land Use Committee,

  Please add these comments to the official legislative file for **File No. 251211**.

  I am writing to **OPPOSE** the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining"; it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.

  Furthermore, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

  Please **CONTINUE** this item until these democratic and equitable protections are restored.

  Sincerely,

  Abigail Kroch, SoMa resident

From:	Shalmali Bane
To:	Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS); Carroll, John (BOS)
Subject:	Public Comment - File No. 251211 - Opposition to Appeals Ban
Date:	Tuesday, January 6, 2026 4:51:13 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Chair Melgar and Members of the Land Use Committee,

Please add these comments to the official legislative file for **File No. 251211**.

I am writing to **OPPOSE** the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining"; it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.

Furthermore, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

Please **CONTINUE** this item until these democratic and equitable protections are restored.

Sincerely,

Shalmali Bane, SOMA west neighborhood

From:	Collin Tharp
To:	Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS); Carroll, John (BOS)
Subject:	Public Comment - File No. 251211 - Opposition to Appeals Ban
Date:	Tuesday, January 6, 2026 5:20:42 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Chair Melgar and Members of the Land Use Committee,

Please add these comments to the official legislative file for **File No. 251211**.

I am writing to **OPPOSE** the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining"; it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.

Furthermore, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

Please **CONTINUE** this item until these democratic and equitable protections are restored.

Sincerely,

Collin Tharp

Potrero Hill

From:	Barklee Sanders
To:	Carroll, John (BOS); Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS)
Cc:	contact@fairtrees.org; Shaun Aukland
Subject:	Re: Action Alert: Next Monday, City Hall is voting to strip your tree appeal rights
Date:	Tuesday, January 6, 2026 6:14:01 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Public Records Request under the California Public Records Act (Gov. Code § 7920.000 et seq.) and San Francisco Sunshine Ordinance (Admin. Code Ch. 67) concerning **File No. 251211 ("PermitSF" legislation)**, any amendments affecting **Public Works Code Article 16 (Urban Forestry Ordinance)**, and **City-initiated tree removal appeal rights and "low-canopy" in-lieu fees**.

Pursuant to CPRA and the Sunshine Ordinance, please produce the following records **from January 1, 2024 to present** (or earlier if needed for completeness). I request **electronic copies** (native format where available) and **rolling production** as records are located. If any portion is withheld, please provide a **Vaughn-style index** stating the specific exemption and how it applies.

A. Legislation & Redlines (File No. 251211):

1. All drafts, redlines, margin notes, and working copies of File No. 251211 and any trailer/companion ordinances that amend **Public Works Code Article 16** or address **appeals of City-initiated tree removals** or "final and non-appealable" language.

2. All committee packets, staff reports, fiscal/equity analyses, and "legislative digest" language; including any version posted to or prepared for the **Land Use & Transportation Committee** (meeting agendas and packets).

3. Any **CEQA** memos/determinations related to the ordinance(s) and whether changes to tree-removal appeal rights were assessed as a project impact.

B. Policy Basis for Appeal Changes:
4) Internal/external correspondence (including emails, texts, Slack/Teams messages) among **Mayor's Office, Clerk/BOS, Public Works/BUF, Planning, City Attorney, Board of Appeals, and Department of the Environment** discussing:

- proposals to eliminate or limit public appeals of **City-initiated** tree removals;

- the phrase "**final and non-appealable**" (or similar);

- jurisdiction of the **Board of Appeals** over tree-removal orders;

- comparisons to current practice noted on DPW/BUF pages (notice/hearing/appeal). Please include attachments and calendar invites. Suggested search terms: **"251211" "PermitSF" "Article 16" "tree removal" "appeal" "non-appealable" "BUF" "Board of Appeals" "low canopy" "in-lieu" "fee" "equity" "Posting 30 days."**

C. "Low-Canopy" In-Lieu Fee Targeting:
5) Any definitions, maps, methodologies, or datasets used to define "**low-canopy neighborhoods**," including draft criteria, environmental burden indexes, CalEnviroScreen overlays, and proposed fund allocation rules.
6) Communications with developers, BIDs, or advocacy groups regarding in-lieu fee substitutions for on-site planting and fund deployment in "low-canopy" areas.

D. Impact & Historical Records:
7) Annual counts (CSV/spreadsheet) for **2018-present**: tree-removal permits initiated by **City departments**, objections received, hearings held, Director decisions, and **appeals filed and outcomes** (including to the **Board of Appeals**). Include any datasets that back Public Works web statements about objections, hearings, and appealability.
8) Records relating to the **Calle 24 / 24th Street ficus** proceedings (BUF recommendations, posted notices, appeals, Board of Appeals actions, and final conditions), used as precedent in policy discussions.

E. Public Notice & Meeting Compliance:
9) Proof of noticing, agenda postings, and public comment instructions for any meetings where the appeal-rights change was discussed (committee and full Board).
10) Any Sunshine/Brown Act compliance reviews or guidance from the **City Attorney** regarding public participation on this subject.

Format, Fees, Timelines:
I request **fee waiver**/no-cost electronic production (CPRA § 7922.530), **rolling releases**, and confirmation within **10 days** (and any extension basis) as required by law. For any redactions/withholdings, identify the **specific code section** and explain how it applies. If records are available on public sites, please provide **direct URLs**.

Departments/Offices to Search:
Clerk of the Board/BOS (including Land Use & Transportation Committee), **Public Works – Bureau of Urban Forestry**, **Board of Appeals**, **Planning Department**, **City Attorney (Supervisor of Records)**, **Department of the Environment**, and **Mayor's Office**.

Barklee Sanders
Technology Consultant
More about me: barkleesanders.com
Schedule a meeting: https://cal.com/barkleesanders

On Tue, Jan 6, 2026 at 6:26 PM Shaun Aukland <shaun.aukland@gmail.com> wrote:



Hi everyone,

I am writing with an urgent warning. While we have been fighting for *more* trees, the City has quietly fast-tracked legislation that would strip your right to protect the *existing* ones. On **Monday, Jan 12th**, the Land Use Committee will vote on **File No. 251211**.

Buried in Lurie's new "streamlining" bill is a provision that **eliminates the public's right to appeal** tree removals initiated by City departments.

Why care? Currently, if Public Works or another agency wants to cut down mature trees on your block, you have the legal right to file an appeal and force a public hearing. Importantly, the process **works.** It is how residents saved nearly 40 mature trees in the Mission's **Calle 24** district when the City wanted to clear-cut them.

However, under the new law, that right vanishes. The Director's decision to cut would be "final and non-appealable."

This is not "streamlining." It is silencing. The City is effectively saying that it does not trust its citizens to have a voice in the design of their own neighborhoods.

We are also concerned about an "equity loophole": The bill allows developers to pay a fee instead of planting new trees. The fee goes to plant trees in "low canopy neighborhoods" but **leaves this undefined.** As this group knows well, without a strict definition, funds get assigned with little regard for actual canopy cover of environmental burden scores.

Two Fast Ways To Help:

We need to register opposition to these clauses.

Step 1: Copy and Paste this Email. This ensures your opposition is placed in the official file for every Supervisor to see. You may modify it your message to be more personal, if desired.

- **To:** John.Carroll@sfgov.org, Board.of.Supervisors@sfgov.org, Myrna.Melgar@sfgov.org, Bilal.Mahmood@sfgov.org, Chyanne.Chen@sfgov.org
- **Subject:** Public Comment - File No. 251211 - Opposition to Appeals Ban

  Dear Chair Melgar and Members of the Land Use Committee,

  Please add these comments to the official legislative file for **File No. 251211**.

  I am writing to **OPPOSE** the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining"; it is a removal of critical oversight that has

> historically saved mature trees from unnecessary destruction.
>
> Furthermore, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.
>
> Please **CONTINUE** this item until these democratic and equitable protections are restored.
>
> Sincerely, [Your Name] [Your Neighborhood]

Step 2: Sign the Petition -- Join over 500 neighbors in demanding the Board reject this ban on appeals.

It seems Mayor Lurie and Supervisor Wong want to make it easier to cut trees, even as our city's canopy declines, without an equity plan. Together, we can push back on this.

Best,

Shaun Aukland
FairTrees.org

--

You are receiving this email as a community partner or petition signer at FairTrees.org.
If you would like to unsubscribe from future updates, you can do so here.

From:	Josh Jagerman
To:	Carroll, John (BOS); Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS)
Subject:	Public Comment - File No. 251211 - Opposition to Appeals Ban
Date:	Tuesday, January 6, 2026 6:21:27 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Chair Melgar and Members of the Land Use Committee,

Please add these comments to the official legislative file for **File No. 251211**.

I am writing to **OPPOSE** the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining"; it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.

Furthermore, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

Please **CONTINUE** this item until these democratic and equitable protections are restored.

Sincerely,

Josh Jagerman

From:	Rebecca Hardy
To:	Carroll, John (BOS); Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS)
Subject:	Public Comment - File No. 251211 - Opposition to Appeals Ban
Date:	Tuesday, January 6, 2026 6:54:22 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Chair Melgar and Members of the Land Use Committee,

Please add these comments to the official legislative file for **File No. 251211**.

I am writing to **OPPOSE** the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining;" it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.

Furthermore, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

Please **CONTINUE** this item until these democratic and equitable protections are restored.

Sincerely,

Rebecca Hardy, Potrero Hill

From:	Amanda Rodriguez
To:	Carroll, John (BOS); Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS)
Subject:	Public Comment - File No. 251211 - Opposition to Appeals Ban
Date:	Tuesday, January 6, 2026 6:57:16 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Chair Melgar and Members of the Land Use Committee,

Please add these comments to the official legislative file for **File No. 251211**.

I am writing to **OPPOSE** the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining"; it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.

Furthermore, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

Please **CONTINUE** this item until these democratic and equitable protections are restored.

Sincerely,

Amanda Rodriguez

Glen Park resident

From:	Laurel Myers
To:	Carroll, John (BOS); Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS)
Subject:	Public Comment - File No. 251211 - Opposition to Appeals Ban
Date:	Tuesday, January 6, 2026 7:46:27 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Chair Melgar and Members of the Land Use Committee,

Please add these comments to the official legislative file for **File No. 251211**.

I am writing to **OPPOSE** the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining"; it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.

Furthermore, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

Please **CONTINUE** this item until these democratic and equitable protections are restored.

Sincerely,

Laurel Myers, SoMA resident

From:	Andrea Biltagi
To:	Carroll, John (BOS); Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS)
Subject:	Public Comment - File No. 251211 - Opposition to Appeals Ban
Date:	Tuesday, January 6, 2026 8:00:01 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Chair Melgar and Members of the Land Use Committee,

Please add these comments to the official legislative file for **File No. 251211**.

I am writing to **OPPOSE** the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining"; it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.

Furthermore, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

Please **CONTINUE** this item until these democratic and equitable protections are restored.

Sincerely,

Andrea Biltagi

Tenderloin, 94102

From:	Frank Lorch
To:	Carroll, John (BOS); Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS)
Subject:	Public Comment - File No. 251211 - Opposition to Appeals Ban
Date:	Tuesday, January 6, 2026 8:34:59 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Chair Melgar and Members of the Land Use Committee,

Please add these comments to the official legislative file for **File No. 251211**.

I am writing to **OPPOSE** the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining"; it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.

Furthermore, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

Please **CONTINUE** this item until these democratic and equitable protections are restored.

Sincerely,
Frank Lorch
Sunset

From:	Mc Mc 1
To:	Carroll, John (BOS); Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS)
Subject:	legislative File No. 251211. OPPOSE eliminating public appeal for tree removal
Date:	Tuesday, January 6, 2026 11:05:42 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Chair Melgar and Members of the Land Use Committee,
Please add these comments to the official legislative file for **File No. 251211**.
I am writing to **OPPOSE** the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining"; it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.
Furthermore, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.
Please **CONTINUE** this item until these democratic and equitable protections are restored.
Sincerely,
Mary McFadden
Anza VIsta

From:	Nikhil Gowda
To:	Carroll, John (BOS); Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS)
Subject:	Public Comment - File No. 251211 - Opposition to Appeals Ban
Date:	Wednesday, January 7, 2026 8:48:55 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Chair Melgar and Members of the Land Use Committee,

Please add these comments to the official legislative file for **File No. 251211**.

I am writing to **OPPOSE** the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining"; it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.

Furthermore, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

Please **CONTINUE** this item until these democratic and equitable protections are restored.

Sincerely,

Nikhil Gowda

West SoMa resident and home owner.

From:	Barbara Bagot-López
To:	Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS)
Cc:	FielderStaff; Carroll, John (BOS); Board of Supervisors (BOS)
Subject:	Public Comment - File No. 251211 - Opposition to Appeals Ban
Date:	Wednesday, January 7, 2026 10:29:20 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Hello, Chair Melgar & members of the Land Use Committee.

Please add my comments to the official legislative file for **File No. 251211**.

I OPPOSE the elimination of the public right to appeal city-initiated tree removals. Removing due process--removing the voice of SF residents--is not "streamlining"; it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.

In addition, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

Please CONTINUE this item until these democratic and equitable protections are restored.

Sincerely,
Barbara Bagot-López
Resident of Bernal Heights and San Francisco for 49 years who appreciates street trees

From:	Loren Craig Harrington
To:	Carroll, John (BOS); Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS)
Subject:	Public Comment - File No. 251211 - Opposition to Appeals Ban
Date:	Wednesday, January 7, 2026 1:18:40 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Chair Melgar and Members of the Land Use Committee,

Please add these comments to the official legislative file for File No. 251211.

I am writing to OPPOSE the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining"; it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.

Furthermore, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

Please CONTINUE this item until these democratic and equitable protections are restored.

Sincerely,

Craig Harrington
Twin Peaks SF

From:	David Singer
To:	Carroll, John (BOS); Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS)
Subject:	Public Comment - File No. 251211 - Opposition to Appeals Ban
Date:	Wednesday, January 7, 2026 4:30:50 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Chair Melgar and Members of the Land Use Committee,

I am writing to OPPOSE the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Though I appreciate that streamlining is needed, this goes too far, especially in the light of history where the city has failed to plant and maintain trees unless prompted. If the DPW and were doing a fabulous job, perhaps lacking an appeal wouldn't matter, but they have not been, and so it does, a lot.

I'd like the legislation amended to define "low tree canopy" neighborhoods with a strict data-driven methodology that includes canopy cover and environmental burden scores.
Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

Please CONTINUE this item until these democratic and equitable protections are restored.

Please add these comments to the official legislative file for File No. 251211.

Thank you, David Singer, SOMA

From: Tisay Baclay
To: Melgar, Myrna (BOS)
Cc: Chen, Chyanne (BOS); Carroll, John (BOS); Mahmood, Bilal (BOS); Board of Supervisors (BOS)
Subject: Subject: Public Comment – File No. 251211 – Opposition to Appeals Ban
Date: Wednesday, January 7, 2026 4:44:04 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Subject: Public Comment – File No. 251211 – Opposition to Appeals Ban

Dear Chair Melgar and Members of the Land Use Committee,

Please add these comments to the official legislative file for **File No. 251211**.

I am writing to **strongly OPPOSE** the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. While framed as administrative "streamlining," this provision fundamentally strips communities of their right to be heard and removes meaningful oversight over decisions that directly affect neighborhood health, environmental equity, climate resilience, and quality of life.

Under current law, when Public Works or another City agency seeks to remove mature trees, residents have the legal right to file an appeal and trigger a public hearing. This process is not theoretical - it works. File No. 251211 would eliminate this safeguard entirely.

The right to public participation and due process is not optional. It is protected under the **First and Fourteenth Amendments of the U.S. Constitution**, including the rights to free speech, to petition the government for redress of grievances, and to due process under the law. Fast-tracking legislation that removes appeal rights, especially when initiated by City departments themselves, raises serious constitutional concerns and undermines democratic governance. San Francisco must not become a city where community voices are treated as impediments rather than essential partners.

San Francisco has long been recognized as a leader in **environmental protection, climate justice, and civic engagement**. At a moment when residents are already absorbing sweeping budget cuts across healthcare, social services, outreach, housing stabilization, and environmental programs, this legislation further erodes trust and participation. The question before us is not whether the City can move

faster, but whether it can do so **without abandoning its values**.

Across the city, residents have stepped up beyond expectations - working in partnership with community-based nonprofits, organizing neighbors, and serving as frontline responders to the consequences of disinvestment. We are the ones operating at ground zero, engaging directly with impacted communities and protecting neighborhood-level environmental health. Removing public oversight ignores this lived experience and weakens outcomes.

I am also deeply concerned about an **equity loophole** in the legislation. While the bill allows developers to pay an In-Lieu Fee in place of planting trees, it fails to clearly define “low tree canopy” neighborhoods. Without a strict, data-driven definition that includes **canopy cover metrics and environmental burden scores**, these funds risk being allocated without regard to actual environmental need, undermining the very equity goals the policy claims to advance.

For these reasons, I respectfully request that the Committee **CONTINUE this item** until public appeal rights, constitutional protections, and clear environmental equity safeguards are fully restored.

Sincerely,
Teresa Dulalas
Resident - SoMa Pilipinas Filipino Cultural Heritage District 6

From:	Claudia Stern
To:	Carroll, John (BOS); Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS)
Cc:	Shaun Aukland
Subject:	Public Comment - File No. 251211 - Opposition to Appeals Ban
Date:	Thursday, January 8, 2026 5:55:13 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Chair Melgar and Members of the Land Use Committee,

Please add these comments to the official legislative file for **File No. 251211**.

I have lived and voted in San Francisco since 1985. As a retiree, I now volunteer in the garden (Sutro Park) near my house. I am lucky to have an increasing number of trees on the streets near my home thanks to the Friends of the Urban Forest. These trees reduce heat and noise, provide water absorption during rainy periods, and provide habitat for living creatures. We need more trees to make SF an even better city.

I am writing to **OPPOSE** the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining"; it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.

Furthermore, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

Please **CONTINUE** this item until these democratic and equitable protections are restored.

Sincerely,
Claudia Stern
714 44th Avenue
415 318 6461

Disclaimer

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more Click Here.

From: Steve Ensminger
To: Carroll, John (BOS); Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS)
Subject: Public Comment - File No. 251211 - Opposition to Appeals Ban
Date: Thursday, January 8, 2026 10:11:20 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Chair Melgar and Members of the Land Use Committee,

Please add these comments to the official legislative file for **File No. 251211**.

I am writing to **OPPOSE** the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining"; it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.

Furthermore, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

Please **CONTINUE** this item until these democratic and equitable protections are restored.

Sincerely, [Your Name] [Your Neighborhood]

From:	Theatre District Neighbors
To:	Carroll, John (BOS)
Cc:	Melgar, Myrna (BOS); Chen, Chyanne (BOS); Mahmood, Bilal (BOS)
Subject:	Opposition for File No. 251211 tree legislation
Date:	Thursday, January 8, 2026 10:21:22 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Chair Melgar and Land Use Committee Members,

Please add these comments to the official legislative file for File No. 251211.

We need more trees to make SF an even better city.

Theatre District Neighbors is writing to OPPOSE the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining"; it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.

Furthermore, We request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

Please CONTINUE this item until these democratic and equitable protections are restored.

Sincerely,
--

Theatre District Neighbors

P.O. Box 420846

San Francisco, CA 94142-0846

theatredistrictneighbors@gmail.com

(415) 339-8779

https://atasf7.wixsite.com/tdneighbors

From: dweller SF
To: Melgar, Myrna (BOS); Chen, Chyanne (BOS); Mahmood, Bilal (BOS)
Cc: Carroll, John (BOS)
Subject: reject File No. 251211 trees
Date: Thursday, January 8, 2026 11:20:21 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

94105 Resident (Rincon Hill / South Beach / SoMa)
Strong Opposition to Proposed Amendments in File No. 251211
(Urban Forestry PROPOSED Ordinance Changes)
January 8, 2026

Dear Members of the San Francisco Board of Supervisors,

As a resident of **ZIP code 94105** in the Rincon Hill, South Beach, and South of Market (SoMa) area—one of San Francisco's fastest-growing neighborhoods dominated by high-rises and with **critically low tree canopy coverage of approximately 4-5%** (far below the citywide average of 13.7%), including areas like South Beach and parts of SoMa with very little tree cover—I and my family are **vehemently oppose** the proposed amendments in File No. 251211. Our concrete-heavy streets already create severe urban heat islands, poor air quality, and extreme vulnerability to wildfire smoke and heat waves. These changes would exacerbate environmental inequities by letting developers skip on-site tree planting in the very places experiencing intense new development.

Key Reasons for Opposition:

1. **Devastating Blow to Greening in High-Density, Low-Canopy Areas Like 94105**
   South Beach, Rincon Hill, and SoMa have some of the lowest street tree canopy in the city—around 4.1% in parts of SoMa—with vast stretches of pavement and towering buildings offering little shade. These areas are priority zones for the **$12 million federal Inflation Reduction Act grant** targeting low-canopy, heat-vulnerable neighborhoods including SoMa to plant **3,500 new street trees**. Allowing developers to pay in-lieu fees instead of planting on-site—or exempting ADUs—would undermine this critical effort, leaving new luxury high-rises without greenery and denying residents immediate cooling and cleaner air amid booming development.
2. **Undermining Our Primary Source of New Trees Amid Severe Budget Crises**
   With the City's historic budget deficits—closing an **$800+ million shortfall in FY 2025-26** and facing projections up to **$1 billion** in coming years—Public Works' Urban Forestry programs are chronically underfunded, relying heavily on grants and external sources. **Mandatory tree planting from new development has become the main reliable way San Francisco adds street trees**. Expanding in-lieu fees and exemptions would sever this vital pipeline, stalling greening in fast-developing areas

like mine where every tree is essential.

3. **Exacerbating Life-Threatening Health and Climate Risks**
   Low tree canopy in 94105 leads to temperatures 10–20°F higher than greener neighborhoods, worsened air quality from traffic and freeways, and severe impacts from California's wildfires and droughts—we endured weeks of hazardous orange skies and smoke in 2020. Residents face elevated risks of heat-related illness and respiratory problems. Eliminating appeals for City tree removals erodes oversight, while online-only notices exclude many.
4. **Betraying City Promises and Contradicting Protective Policies Elsewhere**
   These developer-friendly changes prioritize short-term efficiency over accountability, unlike robust appeal processes in cities such as Beverly Hills, Pacifica, Los Altos, Mountain View, Santa Cruz, Saratoga, San Luis Obispo, Santa Monica, and Pasadena. They undermine the Urban Forest Plan, federal Justice40 commitments, and environmental goals—while areas like 94105 suffer from unchecked concrete expansion.

We cannot afford more barren streets in our skyline-dominated neighborhood. My family demands you **reject File No. 251211 entirely** and strengthen mandates for on-site planting and public appeals to deliver real trees where new development is transforming our community.

Regards,

The Fong Family

94105 Resident & Native San Franciscan
Rincon Hill / South Beach / SoMa, San Francisco, CA

From: dweller SF
To: Melgar, Myrna (BOS); Chen, Chyanne (BOS); Mahmood, Bilal (BOS)
Cc: Carroll, John (BOS)
Subject: reject File No. 251211 trees
Date: Thursday, January 8, 2026 11:20:19 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

94105 Resident (Rincon Hill / South Beach / SoMa)
Strong Opposition to Proposed Amendments in File No. 251211
(Urban Forestry PROPOSED Ordinance Changes)
January 8, 2026

Dear Members of the San Francisco Board of Supervisors,

As a resident of **ZIP code 94105** in the Rincon Hill, South Beach, and South of Market (SoMa) area—one of San Francisco's fastest-growing neighborhoods dominated by high-rises and with **critically low tree canopy coverage of approximately 4-5%** (far below the citywide average of 13.7%), including areas like South Beach and parts of SoMa with very little tree cover—I and my family are **vehemently oppose** the proposed amendments in File No. 251211. Our concrete-heavy streets already create severe urban heat islands, poor air quality, and extreme vulnerability to wildfire smoke and heat waves. These changes would exacerbate environmental inequities by letting developers skip on-site tree planting in the very places experiencing intense new development.

Key Reasons for Opposition:

1. **Devastating Blow to Greening in High-Density, Low-Canopy Areas Like 94105**
   South Beach, Rincon Hill, and SoMa have some of the lowest street tree canopy in the city—around 4.1% in parts of SoMa—with vast stretches of pavement and towering buildings offering little shade. These areas are priority zones for the **$12 million federal Inflation Reduction Act grant** targeting low-canopy, heat-vulnerable neighborhoods including SoMa to plant **3,500 new street trees**. Allowing developers to pay in-lieu fees instead of planting on-site—or exempting ADUs—would undermine this critical effort, leaving new luxury high-rises without greenery and denying residents immediate cooling and cleaner air amid booming development.
2. **Undermining Our Primary Source of New Trees Amid Severe Budget Crises**
   With the City's historic budget deficits—closing an **$800+ million shortfall in FY 2025-26** and facing projections up to **$1 billion** in coming years—Public Works' Urban Forestry programs are chronically underfunded, relying heavily on grants and external sources. **Mandatory tree planting from new development has become the main reliable way San Francisco adds street trees**. Expanding in-lieu fees and exemptions would sever this vital pipeline, stalling greening in fast-developing areas

like mine where every tree is essential.

3. **Exacerbating Life-Threatening Health and Climate Risks**
   Low tree canopy in 94105 leads to temperatures 10–20°F higher than greener neighborhoods, worsened air quality from traffic and freeways, and severe impacts from California's wildfires and droughts—we endured weeks of hazardous orange skies and smoke in 2020. Residents face elevated risks of heat-related illness and respiratory problems. Eliminating appeals for City tree removals erodes oversight, while online-only notices exclude many.
4. **Betraying City Promises and Contradicting Protective Policies Elsewhere**
   These developer-friendly changes prioritize short-term efficiency over accountability, unlike robust appeal processes in cities such as Beverly Hills, Pacifica, Los Altos, Mountain View, Santa Cruz, Saratoga, San Luis Obispo, Santa Monica, and Pasadena. They undermine the Urban Forest Plan, federal Justice40 commitments, and environmental goals—while areas like 94105 suffer from unchecked concrete expansion.

We cannot afford more barren streets in our skyline-dominated neighborhood. My family demands you **reject File No. 251211 entirely** and strengthen mandates for on-site planting and public appeals to deliver real trees where new development is transforming our community.

Regards,

The Fong Family

94105 Resident & Native San Franciscan
Rincon Hill / South Beach / SoMa, San Francisco, CA

From:	SusanW
To:	Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Carroll, John (BOS); Board of Supervisors (BOS)
Subject:	Tree removal
Date:	Thursday, January 8, 2026 10:55:50 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Chair Melgar and Members of the Land Use Committee,

Please add these comments to the official legislative file for **File No. 251211**.

I am writing to **OPPOSE** the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining"; it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.

Furthermore, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

Please **CONTINUE** this item until these democratic and equitable protections are restored.

Sincerely,

Susan Weisberg

From:	Theatre District Neighbors
To:	Carroll, John (BOS)
Cc:	Melgar, Myrna (BOS); Chen, Chyanne (BOS); Mahmood, Bilal (BOS)
Subject:	Opposition for File No. 251211 tree legislation
Date:	Thursday, January 8, 2026 10:21:24 AM

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Dear Chair Melgar and Land Use Committee Members,

Please add these comments to the official legislative file for File No. 251211.

We need more trees to make SF an even better city.

Theatre District Neighbors is writing to OPPOSE the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining"; it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.

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Please CONTINUE this item until these democratic and equitable protections are restored.

Sincerely,
--

Theatre District Neighbors

P.O. Box 420846

San Francisco, CA 94142-0846

theatredistrictneighbors@gmail.com

(415) 339-8779

https://atasf7.wixsite.com/tdneighbors

From: Steve Ensminger
To: Carroll, John (BOS); Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS)
Subject: Public Comment - File No. 251211 - Opposition to Appeals Ban
Date: Thursday, January 8, 2026 10:11:31 AM

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Dear Chair Melgar and Members of the Land Use Committee,

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Sincerely, [Your Name] [Your Neighborhood]

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To:	Carroll, John (BOS)
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Please **CONTINUE** this item until these democratic and equitable protections are restored.

Sincerely, [Your Name] [Your Neighborhood]

From: Joshua Klipp via ActionNetwork.org
To: Carroll, John (BOS)
Subject: San Francisco Board of Supervisors, Protect San Francisco Trees!
Date: Thursday, January 8, 2026 9:16:20 AM
Attachments: protect-san-francisco-trees_signatures_202601080515.pdf

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

San Francisco Board of Supervisors,

583 people have signed a petition on Action Network telling you to Protect San Francisco Trees!.

Here is the petition they signed:

> Mayor Lurie and Supervisor Wong's proposals for San Francisco's street trees are disastrous. We already have the smallest urban canopy of any major city in the U.S., and our failure to invest in our City trees has allowed even this small tree canopy to decline. We ask you to not allow Developers to have the choice of planting trees or paying an inadequate fee. This will lead to even fewer trees on City streets.
>
> And we ask you not to eliminate the public's right to appeal City-initiated tree removals. These appeals, for City projects, have nothing to do with expediting development. Additionally, these appeals have lead to innovative results, such as Mission Verde - one of the most innovative City/Community partnerships that resulted in 3x more trees being planted along the Mission District's cultural corridor. Eliminating this right to appeal will result in City projects removing trees en masse without oversight, and will incentivize private developers to persuade the City to remove trees on the taxpayer dime.
>
> Please, reject File #251211 amending San Francisco's Public Works Code Article 16.

You can view each petition signer and the comments they left you in the attached PDF.

Thank you,

Joshua Klipp

Sent via Action Network, a free online toolset anyone can use to

Action Network

organize. Click here to sign up and get started building an email list and creating online actions today.

Action Network is an open platform that empowers individuals and groups to organize for progressive causes. We encourage responsible activism, and do not support using the platform to take unlawful or other improper action. We do not control or endorse the conduct of users and make no representations of any kind about them.

You can unsubscribe or update your email address or change your name and address by changing your subscription preferences here.

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>
> Please, reject File #251211 amending San Francisco's Public Works Code Article 16.

You can view each petition signer and the comments they left you below.

Thank you,

Joshua Klipp

---

1. Joshua Klipp (*ZIP code: 94107)*

2. K Desby (*ZIP code: 94118)*

3. Bryan Dillingham (*ZIP code: 94107)*

4. Natalie Downe (*ZIP code: 94019)*

5. Shaun Aukland (*ZIP code: 94103)*
I object to the removal of any resident voice in appealing tree removals. There is a well-documented history of departmental overreach, non-compliance with laws, and general laziness that the appeals process is intended to provide a check on.

6. Sara Alexander (*ZIP code: 94118)*
Please take a long time to become trees. Let's protect the ones we have. They are precious....

7. Shawna McGrew (*ZIP code: 94122)*

8. Robert Hall (*ZIP code: 94117)*

9. David Romano (*ZIP code: 94121)*
Trees and the tree canopy are critical to the livability of the City. We need to increase and enhance our tree canopy, plant more trees and keep the trees we have.

10. Natalia Peschiera (*ZIP code: 94110)*
I'm signing this petition as a long time resident of SF and a member of mission verde because I am very concerned with the proposed changes to legislation that will negatively impact our relatively small and struggling urban forest canopy. The trees are a vital piece of our communities' health and wellbeing. We must do better for the trees and the people who live amongst them - For today and generations to come.

11. John Mendoza (*ZIP code: 94110)*

12. Judy Irving (*ZIP code: 94133)*
Removing the public's right to appeal has nothing to do with streamlining, and everything to do with the fact that SFRPD broke the law, illegally removed trees, and got caught red-handed by the Board of Appeals. What's worse, if City-initiated tree removals aren't appealable, this incentivizes private developers to get the City to do its tree removals for them, on the taxpayer dime.

13. Roz Arbel (*ZIP code: 94118)*
Please do not remove the community's right to save SF's already dwindling urban canopy!
I never thought I would see the day when our city's Democratic process would be threatened in such a way. As the petition says, it's not about streamlining the building of affordable housing, it's about preserving the nature that already exists in our city. And when you remove a healthy, mature tree, you're not only removing the tree, you're removing the nature that depends on its existence - including humans.

14. Jacqueline Nauman (*ZIP code: 94018)*
Cities need greenery. Take that away and not only is the air quality affected, the city dwellers are negatively affected. There are more reasons than air for having trees visible in urban areas. Read up on Barcelona and how badly that city is affected by no parks or greenery. This is a horrible idea to turn SF into a concrete jungle!!

15. Nancy Shanahan (*ZIP code: 94133)*

16. Renee Lazear (*ZIP code: 94116)*

17. Bridget Maley (*ZIP code: 94123)*

18. SON-SF ~ Save Our Neighborhoods SF (*ZIP code: 94116)*

19. Melinda MacNaughton (*ZIP code: 94018)*

Not Ok to Silence the public about tree concerns. Trees are most important for our survival with climate change and providing what minor habitat SF has left. Not Ok to put developers first over a struggling environment.

20. Courtney Damkroger (*ZIP code: 94109)*

21. Lisa Arjes (*ZIP code: 94122)*

22. Laurew Frishman (*ZIP code: 94018)*

23. Judith Berkowitz (*ZIP code: 94110)*

24. Dorothy Pasquinelli (*ZIP code: 94018)*

25. DANIEL MATAROZZI (*ZIP code: 94110)*
Pls. stop the destruction of our urban forrest by rejecting this developer friendly regulation.

26. Angelina Matarozzi (*ZIP code: 94110)*

27. Charlotte Mooney (*ZIP code: 94118)*

28. Claire Mills (*ZIP code: 94123)*

29. Barbara Heffernan (*ZIP code: 94123)*
Save our trees and stop this nonsense

30. Marie Sorenson (*ZIP code: 94110)*

31. Karen Breslin (*ZIP code: 94127)*

32. Janet Monfredini (*ZIP code: 94127)*
This speaks for itself. Trees make all the difference.....

33. SHARON HAWLEY (*ZIP code: 94110)*

34. Sigrid Bull-McCarthy (*ZIP code: 94122)*
We need more trees not less. If there is a sick and dying tree that poses a threat, it should be replaced with 3 new trees when removed. But no willy nilly tree removal. A concrete jungle is not the city we want. Protect green spaces and protect trees. Keep our right to have a say in what we want for our city!!

35. John Nulty (*ZIP code: 94142)*

36. Nancy Federico (*ZIP code: 94122)*

This is my right! SFRPD is breaking the law!

37. Wayne Johnson (*ZIP code: 94114-2417)*

38. Sarah Bellrichard (*ZIP code: 94110)*

39. Ruth Malone (*ZIP code: 94121)*

40. Katherine Petrin (*ZIP code: 94133)*

41. Greg Giachino (*ZIP code: 94133)*
This move has to be a joke, right?

42. Tomasita Medál (*ZIP code: 94122)*

43. Lynne Burwell (*ZIP code: 94118)*

44. Jamie Wong (*ZIP code: 94116)*

45. Marcus Wong (*ZIP code: 94116)*

46. Erica Zweig (*ZIP code: 94122)*
Another giveaway to developers - there should be greater requirements for developers to increase and enhance SF Green infrastructure! Its a minor hoop to jump and pocket change cost to developers to plant around their new concrete structures. An absurd giveaway!

47. KEN RACKOW (*ZIP code: 94109)*

48. Esfir Shrayber (*ZIP code: 94122)*
Please protect our trees , our oxygen. We need them.

49. Linda Lawrence (*ZIP code: 94804)*
Protect our urban canopy!

50. Aaron Goodman (*ZIP code: 94127)*
See Glen Park Trees, see Excelsior Trees, Mc Laren Park Trees, and Parkmerced Trees along right of way.

51. Mark Peters (*ZIP code: 94114)*

52. Doug Comstock (*ZIP code: 94117)*

53. Mark Beyer (*ZIP code: 94110)*
We need trees! We want trees! Please allow YOUR constituents a voice.

54. Tes Welborn (*ZIP code: 94117-1802)*

55. Rita Da Luz (*ZIP code: 94114)*
People deserve to be heard. Furthering a concrete jungle isn’t in the beat interest of SF in the long run.

56. Leslie Smith (*ZIP code: 94611)*

57. Patricia Taber (*ZIP code: 94114)*
San Francisco has, for a major city, the fewest number of trees than most US cities. Shameful, we should embrace trees not only for their esthetics but also for their positive contribution to our environment.

58. Elizabeth Kiefling (*ZIP code: 94110)*
Preserving our urban forest is fundamental to the health and prosperity of San Francisco’s community, culture and well being.

59. Mary Anne Giglio (*ZIP code: 94018)*

60. Rell Sanderson (*ZIP code: 94114)*

61. Stephanie Peek (*ZIP code: 94116)*

62. Dinorah Salazar (*ZIP code: 94112)*

63. peggy huff (*ZIP code: 94133)*

Eliminating this right to appeal will result in City projects removing trees en masse without oversight, and will incentivize private developers to persuade the City to remove trees on the taxpayer dime.

Please, reject File #251211 amending San Francisco's Public Works Code Article 16.

64. Steve Wilkerson (*ZIP code: 94127)*

65. Scott Feeney (*ZIP code: 94110)*
I've come out on volunteer shifts to water trees with Mission Verde, trees that wouldn't be there without the tree removal appeal process. We love our street trees and want more, not less. And since large scale development often tears up the sidewalk anyway, planting trees at that time just makes sense, it's more efficient! Please reject this legislation and help grow our tree canopy, not shrink it.

66. kim snead (*ZIP code: 94117)*

67. Dave Osgood (*ZIP code: 94105)*
Significant trees are currently slated for removal along Howard Street for largely cosmetic reasons.

We need our right to appeal these misguided decisions.

68. Mahdi Rahimi (*ZIP code: 94110)*

69. bea manuel (*ZIP code: 94112)*

70. Jeff Daniel (*ZIP code: 94116-2613)*

71. Floriana Spezza (*ZIP code: 94122)*

72. Maggie Grabmeier (*ZIP code: 94110)*
Please commit to keeping San Francisco green! As a Mission Verde volunteer, I love to see the community out enjoying our trees. It makes our neighborhoods healthier and more beautiful. It's so important for San Franciscans to feel our connection to nature! Thank you for listening!

73. STEVE WARD (*ZIP code: 94122)*

74. Michael Nulty (*ZIP code: 94142-0846)*
In contrast, many other California cities maintain strong appeal processes to ensure accountability:Beverly Hills: Appeals to the Planning Commission (Municipal Code Title 10, Chapter 3).
Pacifica: 10-day appeal period to Planning Commission, with further escalation to City Council (Title 4, Chapter 12).
Los Altos: 10-day public notification for appeals to City Clerk.
Mountain View: Appeals to Urban Forestry Board or City Council within 10 days.
Santa Cruz: Appeals to Parks and Recreation Commission for heritage trees.
Saratoga: 15-day appeal window for nearby homeowners.
San Luis Obispo: Appeals to Tree Committee.
Santa Monica: Reviews by Urban Forest Task Force.
Pasadena: Standard zoning code appeals for tree protections.

These models demonstrate that appeals foster community trust and prevent arbitrary removals, unlike the proposed streamlining, which could lead to unchecked tree loss.

75. RADOGO ULUINADAVE (*ZIP code: 94102)*

76. Tricia Downey (*ZIP code: 94122)*
Please, reject File #251211 amending San Francisco's Public Works Code Article 16.

77. Paula L (*ZIP code: 94121)*

78. Harold Miller (*ZIP code: 94188)*
Help us save the trees

79. SUSAN BRYAN (*ZIP code: 94102)*

80. Gwendalina Carrera (*ZIP code: 94044)*
We need MORE trees in SF, not fewer.

81. paul wermer (*ZIP code: 94115)*
Trees bring health benefits and environmental benefits AND create the more appealing streetscapes that tourists appreciate

82. Carol Brownson (*ZIP code: 94115)*

83. Deborah Gallegos (*ZIP code: 94112)*
We need more tree plantings in every neighborhood to provide all the medicinal properties that trees have to offer in the environment.

84. Belinda Irons (*ZIP code: 94105)*
Please do not remove trees on Howard St.

85. tom fenwick (*ZIP code: 94122)*
This tree reform makes no sense. Just make it easier and faster to get a permit to plant the trees

86. Katharine Demgen (*ZIP code: 94105)*

87. Avrum Shepard (*ZIP code: 93291)*

88. Matt Laroche (*ZIP code: 94122)*

89. Carla Schlemminger (*ZIP code: 94123)*

90. Ann Rubin (*ZIP code: 94133)*

91. Stephen Davis (*ZIP code: 94044-1517)*
Please maintain the public's right to appeal tree removals in San Francisco. Construction is necessary for the city, of course, but it should not destroy existing trees. Mature trees do so much good for removing CO2, providing habitat for birds, and improving the urban scenery.

92. Margaret O'Brien (*ZIP code: 94121)*

93. Tony Tantillo (*ZIP code: 94105)*

94. John Anderson (*ZIP code: 94115)*
Particular consideration should be given to the remaining coast live oaks, such as the ones on the south block of Laurel St. Architects have a long history of ignoring the natural world, an unfortunate legacy of colonialism. As a city, we should do better.

95. Cathwrine Dodd (*ZIP code: 94131)*
Trees are life. They bring shade, oxygen and charm to the city. That are home to birds. They take

generations to grow. Greed of politicians and the Developers who support them must not continue. Also oppose the ATT Tower in the canopy behind the police academy. The construction will kill off entire parts of forest.

96. Maximilienne Ewalt (*ZIP code: 94112)*
To: San Francisco Board of Supervisors
From: Maximilienne Ewalt

Mayor Lurie and Supervisor Wong's proposals for San Francisco's street trees are disastrous. We already have the smallest urban canopy of any major city in the U.S., and our failure to invest in our City trees has allowed even this small tree canopy to decline. We ask you to not allow Developers to have the choice of planting trees or paying an inadequate fee. This will lead to even fewer trees on City streets.

And we ask you not to eliminate the public's right to appeal City-initiated tree removals. These appeals, for City projects, have nothing to do with expediting development. Additionally, these appeals have lead to innovative results, such as Mission Verde - one of the most innovative City/Community partnerships that resulted in 3x more trees being planted along the Mission District's cultural corridor. Eliminating this right to appeal will result in City projects removing trees en masse without oversight, and will incentivize private developers to persuade the City to remove trees on the taxpayer dime.

Please, reject File #251211 amending San Francisco's Public Works Code Article 16.

97. Linda Weiner (*ZIP code: 94110)*

98. Peter Fortune (*ZIP code: 94133)*

99. Mearu Takatsu (*ZIP code: 94123)*
REJECT Mayor Lurie's and
Supervisor Wong's propposed amendment to the Public Works Code -- reject File #2151211 amendment to the SF Public Works Code Article 16.

100. Elias Berbari (*ZIP code: 94116)*

101. Catherine Chase (*ZIP code: 94111)*
It is important to keep the tree canopy we have and add to it if at all possible.

102. deanne delbridge (*ZIP code: 94123-1175)*
Thank you for starting this, Joshua. Every effort to save our trees in San Francisco is totally worth it and you and only a small handfull of others continue this work by yourselves. Please let me know how to reach you.

103. Linda Shaffer (*ZIP code: 94121-3255)*

104. Anna Esquivel (*ZIP code: 94116)*
It’s disturbing that the tree canopy in San Francisco is less than half the national average. This city needs to do better to protect and preserve the trees are in place!

105. Judi Gorski (*ZIP code: 94116)*

106. Chandra Friese (*ZIP code: 95476)*

107. Barbara Delaney (*ZIP code: 94122)*

108. Holly Watts (*ZIP code: 94116)*

109. DOUGLAS ENGMANN (*ZIP code: 94109)*
Keep the appeals process for the public to object to tree removal

110. Cath Ann Giacomini-McDonald (*ZIP code: 94116)*

111. An anonymous signer (*ZIP code: 94103)*

112. Kerrie Walsh (*ZIP code: 94116)*

113. Maureen McVerry (*ZIP code: 94107)*
This is important rule that protects everyone in the city - do not cut down mature trees.

114. Lauren Meredith (*ZIP code: 94121)*
Trees are great for people who was to breathe, those who want to see something beautiful around them, those who want to heal quicker after illness… I really hate that they are killed for construction convenience.

115. Heather Davies (*ZIP code: 94116)*
Please do not change the review process for tree removal. It is essential for SF bird populations to retain this canopy. Trees are part of our beloved cultural landscape. Trees help lower the effects of urban heat islands. Trees take decades to mature and are not readily readily replaceable. Public review and input on tree removal should be retained.

116. An anonymous signer (*ZIP code: 94122)*

117. Laurette Tanner (*ZIP code: 94122)*
Trees help create the air we breathe

118. Rebecca Robertson (*ZIP code: 94105)*

119. Jonathan Maguire (*ZIP code: 94116)*

120. Merrill Randol (*ZIP code: 94118)*

121. Al hawley (*ZIP code: 94118)*
Alan wong this legislation is idiotic. You claim it is to provide in lieu fees for planting trees in high need

areas. YOUR DISTRICT is a HIGH NEEED AREA! Many of your streets lack adequate street trees. This and your work to allow more parking is in direct conflict with planning code seeking to improve permeability initially started because people were paving over all of the front right of way to park making your district one of the worst offenders for stormwater runoff and pollution.

122. Jascenta Napier (*ZIP code: 94105)*

123. Linda Bartlett (*ZIP code: 04115)*
Please save any trees and do not remove. We love the trees and they help our community to be beautiful and places for birds to build nests and survive.

124. aaron brick (*ZIP code: 94134)*

125. Margot Garey (*ZIP code: 94115)*
More, NOT less trees in San Francisco.

126. george williams (*ZIP code: 94122)*

127. Alan Shaw (*ZIP code: 94103)*

128. Rosa Maline (*ZIP code: 94122)*
Trees help to make streets and cities beautiful.

129. Sharon Harrison (*ZIP code: 94118)*

130. Peter Rothe (*ZIP code: 94127-1848)*
plant more trees

131. Norma Gengler (*ZIP code: 94115)*
Save our trees!

132. Eric Shackelford (*ZIP code: 94116)*

133. Karen Auby (*ZIP code: 94116)*
My supervisor, Mr Wong, is against trees and parks but very interested in adding more parking.

134. Jim Hannah (*ZIP code: 94114)*
Thanks for bringing this to our attention. More trees

135. Joel Sayre (*ZIP code: 94122)*
More Trees!

136. Diana Hazas (*ZIP code: 94112)*
Prioritize trees!!

137. Flannery Alber (*ZIP code: 94116)*

138. Mary Klipp (*ZIP code: 94131)*

139. Lance Carnes (*ZIP code: 94133)*

Last Name Carnes
Email lacarnes@gmail.com
Zip/Postal Code 94133

Comments

You may receive email updates from Joshua Klipp, the creator of this petition.

Protect San Francisco Trees!
San Francisco Board of Supervisors

It's one thing to streamline permits. It's another thing to harm the minimal green infrastructure SF has. Mayor Lurie wants to allow developers to choose between planting trees, or paying an inadequate fee to the City to do it instead. This means not only do we lose trees, but developers can permanently design over spaces that might have accommodated trees in the future.

Additionally, Mayor Lurie seeks to remove the public's right to appeal when a City department initiates a tree removal. This isn't about housing or development. This would include, for example, when SFMTA sought to remove every tree on Van Ness (~200) for the new bus lane. Or when SFDPW sought to remove every tree on 24th Street (~77) between Mission and Potrero. Or when Better Market Streets sought to remove every tree on Market Street for its new sidewalks (~700). If the public didn't have the right to appeal, these trees would be gone. Because of the appeals process, trees were saved, plans were revised, and City-community partnerships were formed.

Removing the public's right to appeal has nothing to do with streamlining, and everything to do with the fact that SFRPD broke the law, illegally removed trees, and got caught red-handed by the Board of Appeals. What's worse, if City-initiated tree removals aren't appealable, this incentivizes private developers to get the City to do its tree removals for them, on the taxpayer dime.

Tell Mayor Lurie that we can - and must - do better. For our trees, for the planet, and for our future.
Petition by
Gravatar
Joshua Klipp
San Francisco, California

To: San Francisco Board of Supervisors
From: Lance Carnes

Mayor Lurie and Supervisor Wong's proposals for San Francisco's street trees are disastrous. We already have the smallest urban canopy of any major city in the U.S., and our failure to invest in our City trees has allowed even this small tree canopy to decline. We ask you to not allow Developers to have the choice of planting trees or paying an inadequate fee. This will lead to even fewer trees on City streets.

And we ask you not to eliminate the public's right to appeal City-initiated tree removals. These

appeals, for City projects, have nothing to do with expediting development. Additionally, these appeals have lead to innovative results, such as Mission Verde - one of the most innovative City/Community partnerships that resulted in 3x more trees being planted along the Mission District's 24th Street cultural corridor. Eliminating this right to appeal will result in City projects removing trees en masse without oversight, and will incentivize private developers to persuade the City to remove trees on the taxpayer dime.

Please, reject File #251211 amending San Francisco's Public Works Code Article 16.

City trees are SF assets (and beautiful greenery) that all citizens depend on for a living and beautiful means of keeping SF's air fresh and our environment green and thriving.

Removing taxpayers' ability to protest the removal of trees via hearings at DPW and Board of Appeals curtails our rights as citizens, to protect these important and health-giving assets.

Please keep current appeal processes in place.

Thank you,
Lance Carnes

140. Rosario Cervantes (*ZIP code: 94112)*
Greenery and growth of our city over developers any time

141. Nan Kornfeld (*ZIP code: 94122)*

142. Chloe Gonzalez Coyle (*ZIP code: 94124)*

143. Beth Patty (*ZIP code: 94122)*
Please keep our city green

144. Jeffrey Beck (*ZIP code: 94122)*

145. Deidra White (*ZIP code: 94118)*

146. Susan Spellman (*ZIP code: 94116)*

147. Lori Liederman (*ZIP code: 94122)*

148. Lael Robertson (*ZIP code: 94107)*

149. Kerri Finn (*ZIP code: 94118)*
Save our trees. We need shade, shelter, oxygen, beauty, preserving living things and homes for our neighboring critters. Leave nature only.

150. Usha Moss (*ZIP code: 94114)*

151. Patricia Sur (*ZIP code: 94121)*

152. Molly Hayden (*ZIP code: 94117)*

153. Cathy Morgan (*ZIP code: 9413)*

154. Judy Minton (*ZIP code: 94107)*

155. Christine Innes (*ZIP code: 94107)*

156. Alice Cassman (*ZIP code: 94117)*
Please protect the trees!

157. karen LARSEN (*ZIP code: 94107)*
We need our trees and have already lost too many. Please re-consider letting developers cut down trees without public input.

158. Kelly Vance (*ZIP code: 94117)*

159. Helen Vander Wende (*ZIP code: 94122)*

160. Jaimie VanPernis (*ZIP code: 94118)*
Save the trees!

161. Marguerite Felts (*ZIP code: 94112)*

162. Nikita Van beek (*ZIP code: 94121)*

163. James Estey (*ZIP code: 94131)*
Keep the trees and add a few more.

164. Cade Peterson (*ZIP code: 94121)*

165. Robin Grossinger (*ZIP code: 94705-1082)*

166. Susan Cronin Parano (*ZIP code: 94121)*
Because these trees are lovely and should not be cut down! A redwood especially ! We need more green!

167. JOAN M BRONER (*ZIP code: 94122)*
We need all trees & those trees need to stay!

168. Mara Sohm (*ZIP code: 94115)*

169. Paul Dohrmann (*ZIP code: 94122)*
Save trees and make the city more green.

170. Bradley Golden (*ZIP code: 94117)*
Something's wong, Lurie-ing the public to lose out to developers over trees is no bueno.

171. Kyung Choi (*ZIP code: 94116)*
SF needs more trees to keep the fresh environment as they produce oxygen far more than Carbon dioxide.
The developers are destroying SF's healthy, natural environment!

172. Blair Czarecki (*ZIP code: 94109)*

173. Brian Reyes (*ZIP code: 94122)*

174. Alan Carpenter (*ZIP code: 94114)*

175. Carolyn Kincaid (*ZIP code: 94112)*

176. Sharon Wilensky (*ZIP code: 94122)*

177. Don Ino (*ZIP code: 94121)*
Corporate developers cannot have carte blanche in disregarding neighborhood charm.

178. Rasa Moss (*ZIP code: 94114)*

179. David Kerby (*ZIP code: 94114)*

180. Michael Rothmann (*ZIP code: 94133)*

181. Susan Cieutat (*ZIP code: 94102)*

182. Jen dougherty (*ZIP code: 94122)*
Please stop destroying our beautiful city

183. Robert Sutton (*ZIP code: 94127)*

184. Sheila Fischer Kiernan (*ZIP code: 94131)*

185. Diem Tran (*ZIP code: 94105)*

186. Rebecca Misner (*ZIP code: 94131)*

187. Carolyn Johnston (*ZIP code: 94127)*

188. Ariane Eroy, Ph. D. (*ZIP code: 94121)*
Realtors, Developers, Investors too often care nothing about the people, or our City, or our beleaguered planet. Their buildings will not give us oxygen or sequester carbon dioxide. Yet Mayor Lurie and the Board has yet to stop them.

We demand that our politicians stop currying favor to the Wealthy, to Corporations, and to Developers. For their ethos is take-the-money-and run; their modality is selling our city to the highest bidder; and their corruption involves wheeling-and-dealing until the City collapses from their greed.
Such short-sightedness proves that corporate Democrats ignore the Climate Emergency in favor of augmenting their campaign coffers -- at everyone's peril!

Wake up! Humanity is facing an existential crisis that will not be resolved by itself. Such a crisis demands that we focus on healing our environment as the number one issue of our time.

"_Our planet is trying to tell us something. But we don't seem to be listening. My dear friends, the American Museum of Natural History is the ideal place to make the point: This great museum tells the amazing story of our natural world--the vast forces that have shaped forces on life over billions of years. And Humanity is just one, small blip on the radar. But like the meteors which wiped out the dinosaurs, we are having an outsized impact. In the case of climate, we are not the dinosaurs. We are the meteor. We are not only in danger. We are the danger. But we are also the solution. This world over billions of years humanity is just a small blip. In the case of climate change, we are not the dinosaurs; we are the meteor. We are not in danger: We are the danger... But we are also the solution.
Antonio Gutteres
UN Secretary General
June 2024

“When you destroy Mother Nature, you destroy yourself."
Maitreya

189. Scott Simons (*ZIP code: 94107)*
Really, no oversight, we might as well annex San Mateo to get more trees

Whenever I go to another city, the first thing I see is trees, and what a delight that is

Why the uphill struggle for the simplest of beauty and health

Can’t we even agree on this?

190. Madhavan Rangaswami (*ZIP code: 94118)*

191. Xenia Rangaswami (*ZIP code: 94115)*

192. Anjali Rangaswami (*ZIP code: 94118)*

193. Paula Katz (*ZIP code: 94116)*

194. Bev Lips (*ZIP code: 94121)*

195. Irma Lewis (*ZIP code: 94107)*
To: SF Board of Supervisors
From: Irma Lewis
The current proposals for San Francisco's street trees are disastrous. SF has the smallest urban canopy of any major city in the U.S., and our failure to invest in our City trees has allowed even this small tree canopy to decline. This has direct, measurable health impacts, particularly our most vulnerable. We ask you to not allow Developers to have the choice of planting trees or paying a fee. This will lead to even fewer trees on City streets.

We ask you not to eliminate the public's right to appeal City-initiated tree removals. These appeals, for City projects, don't impede development. They've actually led to innovative results, such as Mission Verde - one of the most innovative City/Community partnerships that resulted in 3x more trees being planted along the Mission District's cultural corridor. Eliminating this right to appeal will result in City projects removing trees en masse without oversight, and will incentivize private developers to persuade the City to remove trees on the taxpayer dime.

Please, reject File #251211 amending San Francisco's Public Works Code Article 16.

196. Thomas Herz (*ZIP code: 94131)*

197. Laura Griffiths (*ZIP code: 94131)*

198. Eva Daniel (*ZIP code: 94115)*

199. Lauren Jarrell (*ZIP code: 94122)*
Please do not allow this legislation to happen. We have already lost so many trees and have a very small urban canopy for a city of our size.

200. Anastasia Glikshtern (*ZIP code: 94122)*
We need the trees.
And the city is engaged in deforestation - in parks and open spaces. the street trees are under assault too...

201. Jessica Kalafati (*ZIP code: 94114)*

202. Anton Kalafati (*ZIP code: 94114)*

203. Raisa Chudnovskaya (*ZIP code: 94118)*

204. Eugene Bachmanov (*ZIP code: 94118)*

205. Susanna Klebaner (*ZIP code: 94121)*

206. Svetlana Savchuk (*ZIP code: 94122)*

207. Peter Glikshtern (*ZIP code: 94110)*

208. Elizabeth Gould (*ZIP code: 94114)*

209. Benjie Lasseau (*ZIP code: 94109)*
Save the trees please!

210. Michael Goodsmith (*ZIP code: 94109)*

211. Lorraine Petty (*ZIP code: 94115)*
The Lurie/Wong legislation is destructive to our trees, our neighborhoods, and the health of our people, as well as the power of citizens to oversee and overrule developer and government abuse.

212. Galina Gorodetsky (*ZIP code: 94552)*

213. Susan Vaughan (*ZIP code: 94121)*

214. Chrisanne Bradley (*ZIP code: 94131)*
Protect the trees!

215. Tod Elkins (*ZIP code: 94131)*
We must protect our trees in SF!

216. Patrick Villano (*ZIP code: 94117)*

217. Sem Lederman (*ZIP code: 94116)*

218. Janet Kessler (*ZIP code: 94114)*

219. Diana Scott (*ZIP code: 94116)*
Developers, like the MTA, like to cut trees to enable there projects. Planners need to consider the air we breathe as a planning priority. WE NEED OUR RIGHT TO APPEAL bad planning proposals, to insure this!

220. Daniel Detorie (*ZIP code: 94109)*

221. Diane Rivera (*ZIP code: 92011)*
Protect San Francisco Trees

222. Wendy Lowinger (*ZIP code: 94122)*

223. Jason jungreis (*ZIP code: 94121)*

224. Tim Bailey (*ZIP code: 94115)*

225. Sandy Weil (*ZIP code: 94116-1160)*

226. Dennis Rubenstein (*ZIP code: 94110)*
We need to protect what few trees we have in our city

227. Michele Liapes (*ZIP code: 94109)*

228. Christine Patch-Lindsay (*ZIP code: 94122)*

229. Noel Kelton (*ZIP code: 94107)*
Ty! And good luck; we need our trees!

230. Linda Zimmerman (*ZIP code: 94116)*
very unhappy with tree management on all levels in SF. I pay big taxes and feel my opinions should be heard. SF is looking less and less green.

231. judith zimrin (*ZIP code: 94133)*
we need more trees

232. Robert Heisler (*ZIP code: 94116)*
Lurie is gradually morphing into his real self: a fellow billionaire developer-enabling Maga republican. He has no regard for the wishes of the majority of the people of San Francisco and now that he is ensconced is steamrolling forward the maga machine in San Francisco.

233. Theresa potente (*ZIP code: 94117-1703)*

234. Betsy Eddy (*ZIP code: 94131)*
I feel that removing the public's write to appeal tree removal is a gift to developers and will encourage more developers to put buildings close to sidewalks. Please vote to preserve our green canopy.

235. Bree Brown (*ZIP code: 94118-1435)*

236. E B (*ZIP code: 94110)*

237. Carl Wendorf (*ZIP code: 94127)*

238. Howard Wong (*ZIP code: 94133)*

239. Claudette Brooks (*ZIP code: 94124)*

240. Rebecca Diaz (*ZIP code: 94116)*

241. Laurie Wen (*ZIP code: 94110)*

242. Carolyn Doran (*ZIP code: 94116)*
More trees, but maintain the sidewalks. Less parking. People have to wake up to climate change and tree desert pockets of dangerous heat

243. Claudia Kindler (*ZIP code: 94112)*

244. Erik Greenfrost (*ZIP code: 94124)*

245. Elaine Chan-Scherer (*ZIP code: 94122)*
Trees add so much character to the City. They increase property value. They clean the air. Old trees are valuable in ways that touch the soul. Protect the trees!

246. Maureen Gonzalez (*ZIP code: 941105913)*

247. Andrea Galvin (*ZIP code: 94121)*
Please protect and expand San Francisco's tree canopy! Trees beautify the city, provide habitat for birds and other wildlife, provide increasingly needed shade in the warmer months (and rain protection in winter, are shown to improve people's mental health and sense of well being, and do more to calm traffic on streets than all the BS Muni is wasting our money on. We should be investing in more trees, not making it easier to chop them down.

248. Kayla Dzurek (*ZIP code: 94112)*

249. Lucy Hilmer (*ZIP code: 94121)*

250. Bruce Allen (*ZIP code: 94132)*

251. Elsa Townsend (*ZIP code: 94109)*
Remember how bad the air quality gets when forests are burning? Tree canopies provide a vital way of purifying smoky air!

252. Arthur Adams (*ZIP code: 94121)*

253. Laurie Chaprack (*ZIP code: 94116)*

254. Carolyn White (*ZIP code: 94131)*
Trees and green space are critical elements of our city., for the health and well being of all people.

255. Leslie Koelsch (*ZIP code: 94114)*

256. Roger Underhill (*ZIP code: 94132)*

257. Kathleen Hallinan (*ZIP code: 94147-0124)*

258. sara coe (*ZIP code: 94110)*

259. Nadine May (*ZIP code: 94118)*

260. An anonymous signer (*ZIP code: 94133)*

261. Cathryn Lewis (*ZIP code: 94122)*
WE need our trees as they are the key to our health and welfare.....practically and astheitcally.....please protect our city!! WE voted for you Mayor Lurie and now we need to count on you to do the right thing!!

262. Patricia Acosta (*ZIP code: 94114)*
cities need trees! They make a city more beautiful and more livable! And they make our air cleaner. Let's have more oak trees, and thus help the pollinators thrive! this is so important.

263. Michael McCauslin (*ZIP code: 94112)*
San Francisco trees are precious!

264. Nancy Spangler (*ZIP code: 94127)*
Maintain the Green Canopy.

265. Judith Dancer (*ZIP code: 94132)*
Trees are an important part of our ecosystem for breathing and wellbeing. Our ancestors had it right! Keep the trees and stand for beauty!

266. Victoria Duffett (*ZIP code: 94116)*
There has been a shocking - and frankly ugly - amount of tree clearing around the city. I urge restraint from such great swaths of tree removals!

267. Kim Smith (*ZIP code: 94117)*
We need trees.

268. Richard & Gail Manso (*ZIP code: 94109)*

269. Diane Navarro (*ZIP code: 94134)*
Save our trees

270. Gandhia Andrews (*ZIP code: 94132)*

271. Dennis Ainslie (*ZIP code: 94121)*

272. Lois Brady (*ZIP code: 94123)*

273. Denise Selleck (*ZIP code: 94122)*

274. Laure Cleveland (*ZIP code: 49770)*
Except for the non-native, invasive, fire-hazard, eucalyptus! Please replace them with native trees. Thanks.

275. Helen Strain (*ZIP code: 94132)*

276. Susan richmond (*ZIP code: 94118)*
Trees in San Francisco are essential to its beauty and good for wind mitigation, shade, etc. It has taken decades to get them planted (thank you, Friends of the Urban Forest) and must not be destroyed.

277. Ana Malinow (*ZIP code: 94117)*

278. David Richardson (*ZIP code: 94131)*

279. Olga Ryerson (*ZIP code: 94110)*
Don't remove our right to appeal to the Board of Appeals.

280. Bud Ryerson (*ZIP code: 94110)*
I hope I'm not too late. Please let me know what else I can do.

281. Barbara Kivowitz (*ZIP code: 94131)*

282. Monika Pietraszek (*ZIP code: 94122)*
Please protect our tree and tree canopy.

283. Micah Barth-Rogers (*ZIP code: 94121)*

284. Karla McElroy (*ZIP code: 94122)*
Pls. Mayor Lurie & Borad of Supervisors don't permit this legislative change. People 1st! Let our voices be heard, it's the democratic thing to do... Karla - SF Resident

285. Stephen McGurin (*ZIP code: 94118)*

286. Kathleen McCowin (*ZIP code: 94116)*
Stop cutting down our trees!

287. Herb Leong (*ZIP code: 94134)*

288. Amy Meyer (*ZIP code: 94121)*

289. Christine Hall (*ZIP code: 94117)*

290. Ramona Draeger (*ZIP code: 94117)*

291. C K (*ZIP code: 94044)*

292. An anonymous signer (*ZIP code: 94121)*

293. Frances Rapoport (*ZIP code: 94904)*
Our urban environments will slowly become sterile and perhaps toxic without the plants and trees our ancestors flourished with

294. Suzanne Dumont (*ZIP code: 94127)*
Trees are a critical part of the respiratory health of San Franciscans. Do not allow profit driven developers decide the fate of our precious trees.

295. Tracy Castle (*ZIP code: 94131)*

296. Wesley Saunders (*ZIP code: 94112)*

297. Shannon King (*ZIP code: 94115)*
Trees are absolutely key to the beauty of a city. All you have to do is look at Paris. Their trees are well organized in species and trimmed regularly. We need more trees not less.

298. Gretchen Turner (*ZIP code: 94112-1307)*
No right to appeal a removal. They could take out beautul, established trees that are decades old to make for better residential "views", while the rest of us suffer with no shade!

299. Marilyn Tredinnick (*ZIP code: 94127)*
Trees are so important to our city. Please build our city for the future, not just the present.

300. Barry Hermanson (*ZIP code: 94116)*
Josh,
Thanks very much for your work on growing and protecting the urban canopy.

Barry

301. James Parke (*ZIP code: 94122)*
It has been a long hard slog to increase the livability of San Francisco. Key to that is increasing the arboreal canopy for its aesthetics and for the healthy rain capture for our aquifer. More green space equals more healthy clean water to drink. This is not a Trump state, people matter and we want a green haven from real estate seas of concrete.

302. Charles Bush (*ZIP code: 94115)*
We are rapidly losing our already too small tree canopy.

303. Janie Lucas (*ZIP code: 94110)*

304. Yolanda Catzalco (*ZIP code: 94110)*

305. Leslie de Taillandier (*ZIP code: 94109)*

306. Daniel Strickland (*ZIP code: 94114)*
Our trees help make San Francisco beautiful and a more desirable place to live and work. We need to protect them.

307. Stephen Gorski (*ZIP code: 94116)*

308. Jane Bliss (*ZIP code: 94117)*

309. Kim Russo (*ZIP code: 94122-2923)*
Please keep our city green. We need trees! They are good for us and the wildlife in our city.

310. Calvin Lau (*ZIP code: 94115)*

311. Bette Stockton (*ZIP code: 94133)*

312. David Fairley (*ZIP code: 94110)*

313. Lisa Signoff (*ZIP code: 94122)*
Please save our trees!

314. ALEX KRINEY (*ZIP code: 94117)*

315. Norma Yazbek (*ZIP code: 94137)*

316. Georges Yazbek (*ZIP code: 94127)*

317. Dori Yazbek (*ZIP code: 94127)*

318. Helen Ferentinos (*ZIP code: 94114)*
Keep trees where they are. And, when possible, add MORE TREES!

319. Dorothy Niccolls (*ZIP code: 94121)*

320. Connie Begg (*ZIP code: 94122)*

321. Olena Beyer (*ZIP code: 94127-1037)*

322. Irene Nishimura (*ZIP code: 94102)*
Trees help clean the environment of greenhouse gases. We should encourage the planting of trees.

323. Kelly Torres (*ZIP code: 94134)*

Stop runaway developers!! Our trees matter and so does permitting to build. Thats why the system is in place and it should NOT be altered for greedy developers and their supporters

324. Ray Rauen (*ZIP code: 94134)*

325. Erica Chiarucci (*ZIP code: 94122)*

326. James Collector (*ZIP code: 94118)*
Trees are priceless and no policy should result in SF having fewer trees over time.

327. Noa Beharav (*ZIP code: 94127)*

328. Jeanne Choy Tate (*ZIP code: 94110)*

329. Joel VanderWerf (*ZIP code: 94103)*
I have lived for almost 30 years in SoMa, which had nearly zero trees in 1996. Over the years dedicated volunteers have organized plantings and gotten property developers to contribute. We now have much prettier streets, which visitors frequently compliment. This is not about "streamlining". It's about quality of life, city pride, and welcoming visitors.

330. Melinda Dart (*ZIP code: 94112)*
It is wrong to allow developers to deplete our tree canopy. Doing so will degrade our environment all over the city. Please stand up for our right to be connected to nature, birds, life. Don't turn our whole city into a high rise.

331. Marigrace Cohen (*ZIP code: 94116)*

332. elaine benoit (*ZIP code: 94112)*
No, No, No. We need more trees. We need the right to appeal tree removal.. No to developers having trees removed at taxpayers expense.

333. Lisa Platt (*ZIP code: 94123)*

334. Gae Conte (*ZIP code: 94123)*

335. Deborah J. Nosowsky (*ZIP code: 94131)*

336. gene hwang (*ZIP code: 94103)*

337. Ellen Stephens (*ZIP code: 94127)*

338. Denise Chu (*ZIP code: 94134)*
They wiped out all the trees at the dead end of Raymond Ave. Truly disgusted and no notice. It was like a massacre.

339. JoAnn Yates (*ZIP code: 94116)*
I am particularly annoyed with Supervisor Wong supporting this initiative. D4 may easily have the least number of trees in the city, trees that are extremely important for our health as has been demonstrated by science over and over again. Do not make it easier to remove trees.

340. Kindra Scharich (*ZIP code: 94109)*

341. Mary Cervantes (*ZIP code: 94121)*
Please protect the trees!!! For the future wellbeing of humankind.

342. Maria Sousa (*ZIP code: 94131)*

343. John Ripley (*ZIP code: 94110)*

344. Doreen Gotelli (*ZIP code: 94080)*

345. Mary McAllister (*ZIP code: 94116)*
San Francisco is a cold, windy place, which was treeless prior to settlement. It has been systematically destroying its urban forest for decades. Stop San Francisco's war on trees.

346. Betty Jo Swanson (*ZIP code: 94133-2021)*

347. Jennifer Cook (*ZIP code: 94123)*
Mayor Lurie, you must do better for the future of our beautiful city. The city's trees are our reminders of nature's beauty - they aid in our happiness & the planet's well-being.

348. Don Bliss (*ZIP code: 94110)*

349. Laura Maguire (*ZIP code: 94124)*
SF already has one of the smallest tree canopies of a major metropolitan area in the US and needs to focus on adding a lot more trees and quickly. With increasingly extreme weather caused by global warming, any measure to streamline the removal of trees, when there is an urgent need to plant trees, would be shortsighted to say the very least. Making it easy to remove trees should not be a priority for this mayor. Please focus on what we urgently need—a much greater tree canopy.

350. Christopher Plaskett (*ZIP code: 94110)*

351. Diana Gilbert (*ZIP code: 94134)*

352. Anastasia Yovanopoulos (*ZIP code: 94114)*

353. Ryan Boswell (*ZIP code: 94110)*
We need to maintain and grow the green spaces in this city to be able to have healthy, livable streets and communities. Walking down a street lined with trees versus walking down a glass and concrete corridor are wildly different experiences, and a lifeless streetscape makes a neighborhood feel less

welcoming and comfortable. City departments and developers should not have unquestioned power to harm our communities like this.

354. sofia vilsker (*ZIP code: 94122)*

355. Dan Hasegawa (*ZIP code: 94015)*

356. Karen Schulkin (*ZIP code: 94127)*

357. Rupinder Baidwan (*ZIP code: 94122-2557)*

358. MARLAYNE Morgan (*ZIP code: 94109)*

359. Nathalie Paven (*ZIP code: 94117)*

360. Stan Hayes (*ZIP code: 94133)*

361. Susan Karpenko (*ZIP code: 94122)*
Trees are essential to keeping our air clean and provide protection and food for wildlife. Progreen!

362. Raphael Stricker (*ZIP code: 94127)*

363. Margaret Stroad (*ZIP code: 94127)*

364. Jacqueline Westby (*ZIP code: 94112)*

365. Mahin Charles (*ZIP code: 94110)*

366. Patricia Carazo (*ZIP code: 94112)*

367. Peter Walbridge (*ZIP code: 94107)*

368. Anna Abeyta (*ZIP code: 94112)*
Trees are important for the air quality of our city. Please continue to allow citizens to appeal the removal of trees by developers and others that might want to remove trees. Please, reject File #251211 amending San Francisco's Public Works Code Article 16.

369. Barbara Handler (*ZIP code: 94110-5112)*
PLEASE stop turning SF into Manhattan. YES, we need housing, but throwing up all these ugly, identical looking high rises in pretty & old neighborhoods and thren aslo cutting down the trees ruins the entire character of SF AND is terrible for the climate and our air here.

370. Marilyn Ho (*ZIP code: 94134)*
Your organization is supposed to save trees one at a time. Right now we are close to the loss of 400

trees in the Park within about 2 years. I don't know how clear cuttings of a glove are possible. I hope your organization can come up with a guideline to relate it to the new Mayor's office. This tree-cutting activity is not limited to McLaren Park. There are alarming numbers of trees being taken down for weak reasons, i.e. fire, safety, and sunlight for future native plants. I have a friend who is a McLaren Collective volunteer who planted a native garden in the park and watched it being neglected and died. Is there a timeline for replanting any of the trees? So far I haven't seen anything.

Climate Change is a real threat and cutting down a large number of trees that's been here for 75 yrs is not a solution. We can stop this madness.
Thank you for your attention.

371. An anonymous signer (*ZIP code: 94107)*

372. Nancy Keane (*ZIP code: 94118-3523)*
We need more trees, not fewer trees! I'd support a new law requiring developers to double the number of existing trees.

373. James Edwards (*ZIP code: 94131)*

374. Amanda Rodriguez (*ZIP code: 94110)*
Trees are vital for all of our health. Please prioritize them!

375. Ronnie Zuckerberg (*ZIP code: 94131)*

376. Carol Faulkner (*ZIP code: 94116)*

377. Megann Sept (*ZIP code: 94110)*

378. Christel Henderson (*ZIP code: 94124)*

379. Rosana Castrillo Diaz (*ZIP code: 94110)*

380. Francisco Beltran (*ZIP code: 94121)*

381. Bill Snyder (*ZIP code: 94121)*

382. Rachel Aloy (*ZIP code: 94118)*

383. Barbara Butler (*ZIP code: 94116)*
Protect San Francisco trees and continue to create a future with more trees!

384. Marc Duffett (*ZIP code: 94116)*
If property owners are required to pay for the upkeep and replacement of sidewalks, then they should at least have the right to appeal the fate of the trees that are so important to the shared character of our neighborhoods and the city at large.

385. Carolyn Shuman (*ZIP code: 94127-1128)*

386. Lisa Bayan (*ZIP code: 94118)*
We need trees not concrete.
The public should have a voice

387. Jua Burciaga (*ZIP code: 94112)*

388. Linda Twigfire (*ZIP code: 94107)*

389. Gretchen Addi (*ZIP code: 94127)*

390. Susan Bostrom-Wong (*ZIP code: 94121)*
I hav planted 6 street trees in San Francisco through Urban Forest. We need more trees in our city. Protect what everyone have now and in the future.

391. Laurie Dunlap (*ZIP code: 94115)*
We need MORE trees, no fewer. Protect our trees and plant more.

392. Elizabeth Doyle (*ZIP code: 94112-1335)*
We need more trees in San Francisco, and they should be part of any new planning project. The public should be allowed to appeal when tree removals affect them.

393. laureen bergeron (*ZIP code: 94110)*

394. shoshanah dobry (*ZIP code: 94124)*
We need tree canopy for the overall health of the City. If a developer decides to remove a tree then they should pay a $10K fine/tree & plant the same # of trees in a comparable space before they can move forward on that particular project.

395. Douglas Flinn (*ZIP code: 94116)*

396. Elizabeth DiMicco (*ZIP code: 94127)*

397. Steve Lumley (*ZIP code: 94127)*

398. Thomas Yaussy (*ZIP code: 94114)*

399. sue denlinger (*ZIP code: 94131)*

400. Dorothy Ruggles (*ZIP code: 94127)*
Please do not allow this unchecked and unwarranted tree cutting around the city.

401. Laura Kemp (*ZIP code: 94134)*

As a neighbor who has been actively involved in helping plant trees in my neighborhood and my street, I am for planting more street trees in our urban areas. Trees are necessary for a healthier environment, our personal and collective wellbeing, and help bring beauty and grace to our concrete spaces. Any proposal to remove the city's urban tree canopy without community input is preposterous and undemocratic. I am strongly opposed. Thank you.

402. stacy thompson (*ZIP code: 94117)*

403. martin zanfardino (*ZIP code: 94133-2957)*

404. Dianne Prichard (*ZIP code: 94117)*
What is their reasoning for God's sake? Partnered with developers? Very suspicious. Especially, if they don't care about input from voters. Cutting down healthy trees in SF is a dimunition of lifestyle.

405. Susan Mullaney (*ZIP code: 94122)*
This is a really horrible loophole for developers that harms the rest of us. Once the sidewalk can't accommodate a tree well the opportunity will never come back. And removing the right to appeal is too totalitarian for our city.

406. Momoko Otani (*ZIP code: 94123)*

407. Callie Floor (*ZIP code: 94117)*

408. Michael Rich (*ZIP code: 94112)*
We need nature.

409. Revel P (*ZIP code: 94116)*

410. Dory Culver (*ZIP code: 94109-2304)*

411. Elaine Bonn (*ZIP code: 94116)*

412. Phillip Battaglia (*ZIP code: 94114)*

413. Victor Stern (*ZIP code: 94127)*

414. Margaret Sletteland (*ZIP code: 94133)*

415. Caroline Strongman (*ZIP code: 94122)*

416. Debolina Dutta (*ZIP code: 94112)*
This makes no sense. Why would the city make it less livable by removing and then allowing developers the opportunity to bypass planting trees. There are numerous social, environmental and quality of life benefits that's trees bring.
This is yet another way Mayor Lurie is NOT the people's mayor and rather developers' mayor.

417. Sandy S.Alvarez (*ZIP code: 94122)*
Please keep our city with lungs and green areas for our overall health.

418. Mitch Dalition (*ZIP code: 94117)*

419. Darlene Horton (*ZIP code: 94107)*
Please develop a sustainable plan to maintain and increase trees, even with new developments.

420. Deetje Boler (*ZIP code: 94115-4261)*
The change to this process that is needed, if any, would be 1) to increase the penalty for any tree removals to the point that there would be fewer proposed and 2) to encourage (maybe even fund) neighborhood residents (perhaps focused on teens?) to foster new plantings on their streets.

421. Debra Levin (*ZIP code: 94114)*
We need more trees not less- it's crucial to the beauty & health of San Francisco

422. Nathan Lang (*ZIP code: 94121)*

423. Karen Metro (*ZIP code: 94116)*

424. Kasia Shopov (*ZIP code: 94122)*

425. Richard Darrough (*ZIP code: 94117)*
It's obvious that SF has too few trees.
Good planning will provide them along with the badly needed affordable housing.

426. Kayleigh Henson (*ZIP code: 94121)*
I find it astounding how little is required of real estate developers for the privilege of doing business in SF and the millions upon millions they reap in profits. Yet for some reason the city seems entirely willing to let them off the hook for even the smallest of benefits. The idea that they can pay a negligible fee so they don't have to plant some trees says something deeply sad about the mayor's priorities. And the developers. And the soul of this city. Who, other than a movie villain, wants fewer trees in urban settings. Please don't move forward with this.

427. Joan Varrone (*ZIP code: 94114)*
Trees have so many benefits to a tree canopy and we must protect the trees.

428. Laura Burciaga (*ZIP code: 94112)*

429. Shoshana Lavinghouse (*ZIP code: 94118)*

430. Dolores Perez Heilbron (*ZIP code: 94109)*
Please stop these developers from causing further destruction to the natural growth of trees! Thank you.

431. Cindy Navarro (*ZIP code: 94112)*

432. Regina Sneed (*ZIP code: 94109)*
There used to be a street tree advisory committee that took the role of protecting our canopy of trees in the city. With climate change we need more trees and green spaces for air quality, reduction of heat etc.

433. Jamie Delman (*ZIP code: 94103)*

434. Rosemary Booth (*ZIP code: 94118)*
Never remove the public's right to appeal.

435. Yasuyo Satoh (*ZIP code: 94109)*
Tokyo is one of the highly populated cities. They still keep trees. They make the city look beautiful and refreshing.

436. Kristap Baltin (*ZIP code: 94114)*

437. Terry Baum (*ZIP code: 94114)*

438. Yuko Franklin (*ZIP code: 94131)*

439. Alessandra Kameron (*ZIP code: 94109)*
I affirm the importance of retaining the public's right to appeal city-initiated tree removal in San Francisco. We have every reason to expect that the number of removed trees would easily eclipse the number that would be planted to replace them. Similarly, we are already losing, due to age and disease, trees that are not being replaced. Giving potentially unrestricted preference to developer dollars will only compound this condition.

440. Janet Freeman (*ZIP code: 94121)*

441. Cynthia Joe (*ZIP code: 94109)*

442. Victoria Kirby (*ZIP code: 94109)*
Trees are so important, especially in a city. We need more trees, not less!

443. Bianca Molgora (*ZIP code: 94110)*

444. Chris Bunga (*ZIP code: 94117)*

445. Denise O'Sullivan (*ZIP code: 94118)*
Trees are beautiful and healing.

446. joyce fishman (*ZIP code: 94109)*

447. Robin Phillips (*ZIP code: 94131)*

448. Vera Genkin (*ZIP code: 94116)*

449. Gail Colombo (*ZIP code: 94127)*
We need trees, leave them alone. And do not dare to remove the citizen's right to appeal! Fascism has no place in America.

450. Sophia Andary (*ZIP code: 94121)*

451. David Eldred (*ZIP code: 94122)*
We need trees and the PUBLIC right
to make policy and decisions.

452. Suzanne Smith (*ZIP code: 94109)*

453. Cathy Cohn (*ZIP code: 94122)*

454. Karen Tarantola (*ZIP code: 94127)*

455. Lynn Morgenstern (*ZIP code: 94901)*

456. iona Ali (*ZIP code: 94112)*

457. Nancy Edmonson (*ZIP code: 94132)*
PLANT More Trees! Do Not Cut Them Down. We need green, not dirt.

458. Marlene Tran (*ZIP code: 94134)*
Given the urgency of global warming and for the beautification of our cities, we must preserve all our precious trees. Never allow the cutting of any grandfather trees!

459. Winnie Tsang (*ZIP code: 94134)*
Please DON'T cut down any of our beautiful trees in our City. Let them thrive.

460. Hatun Noguera (*ZIP code: 94127)*

461. Margaret Goeden (*ZIP code: 94116)*
I oppose this misguided effort to reduce accountability and silence the public, regarding the public's ability to request review of tree removal by the city. Thank you

462. Bronwyn Gundogdu (*ZIP code: 94122)*
I am very upset with the ongoing removal of trees throughout the city, and very upset with this plan to stop the appeals process re: tree removal. San Francisco is a high density city - and in many areas an ugly tree desert. The Mayor and the Board of Supervisors should be protecting our already scant tree coverage and promoting increased greening of our city.

463. Tony Villa (*ZIP code: 94122-2807)*
Park and Rec is out of control! They are bleeding the city of money and are poorly run.

464. Mary OConnell (*ZIP code: 94123)*

465. An anonymous signer (*ZIP code: 94122)*
Urban forests keep cities alive in multiple ways.

466. Kyle DeWolfe (*ZIP code: 94109)*
The State wants more housing, the residents of San Francisco want more trees!

467. Nancy Donnelly (*ZIP code: 94121)*
Please don't cut the trees down during demolition at the old hospital on Sacramento street! Work around them!! We need them!

468. Heather Estes (*ZIP code: 94116)*
Of course we need the right to appeal removing trees!

469. Joshua Prieto (*ZIP code: 94122)*

470. Shamika Klassen (*ZIP code: 94115)*

471. Savannah Schoelen (*ZIP code: 94122)*

472. Qian Wan (*ZIP code: 94103)*
Trees are needed

473. Christine Segalas (*ZIP code: 94107)*

474. Kristina Cooper (*ZIP code: 94107)*
What a terrible plan!! We need to PLANT trees not remove them

475. Sebastian Forst (*ZIP code: 94114)*

476. Samara Laxineta (*ZIP code: 94121)*

477. Anna Papitto (*ZIP code: 94131)*

478. Alice Rogers (*ZIP code: 94107)*

479. Debbie Bowman (*ZIP code: 94107)*

480. Abigail Kroch (*ZIP code: 94107)*

481. Rose Arrieta (*ZIP code: 94110)*
Please don't silence us. Support our planet and our future.

482. Shalmali Bane (*ZIP code: 94103)*

483. Joseph Barrett (*ZIP code: 94127)*

484. Collin Tharp (*ZIP code: 94107)*

485. Adam Lippe (*ZIP code: 94122)*

486. Elena Giacoman (*ZIP code: 94110)*

487. Teja Pattabhiraman (*ZIP code: 94117)*

488. Marisa Johnson (*ZIP code: 94115)*
Please do not cut down any planted mature trees that can b saved. Takes years with newly planted.

489. Jen Fowler (*ZIP code: 94131)*

490. Harold Klingsporn (*ZIP code: 94109)*
Residents need a voice in such changes to liveability

491. W Chan (*ZIP code: 94102)*
Trees in cities are a great benefit for those who walk or roll. They also beautify our communities and increase real estate values. Keep the trees promised by the developers!

492. Josh Jagerman (*ZIP code: 94103)*

493. KATINA ANTOINE (*ZIP code: 94107)*
Respect nature. Leave the trees alone, the community has a right to object this action.

494. Josh Bruck (*ZIP code: 94131)*
Don’t take away the right to appeal the cutting of trees!

495. Rebecca Hardy (*ZIP code: 94107)*

496. Patrick Monette-Shaw (*ZIP code: 94109)*
In addition to removing the public's right to appeal tree removals, Mayor Lurie’s “Commission Streamlining Task Force” has recommended eliminating the “Urban Forestry Council” completely, and assigning the Forestry Council’s oversight duties to the Commission on the Environment — if (a big if) the Environment Commission deigns to take on the oversight functions of the Forestry Council. The Streamlining Task Force also simultaneously recommended taking the Environment Commission out of the City Charter, moving it to the Administrative Code, and converting it from a “regulatory body” to an “advisory body,” slapping a three-year sunset date on the Environment Commission, and taking

budget approval authority over the Environment Department away from the Environment Commission. Applying a sunset date opens the door to the Environment Commission being shut down by the Board of Supervisors anytime in the future.

The Urban Forestry Council was created by the Board of Supervisors 22 years ago in July 2003 under the “Precautionary Principle” to the manage trees in San Francisco by emphasizing public participation in the preservation and expansion of the urban forest before causing actual environmental harm — including through illegal tree removal and greedy developers avoiding responsibility to protect and expand our urban canopy.

In addition to writing the Board of Supervisors about stopping the Mayor’s removal of citizen appeals of tree removals, also consider writing separately to the Board of Supervisors asking them to overturn the Streamlining Task Force’s decision to eliminate the Urban Forestry Council and decision to take the Environment Commission out of the City Charter and apply a sunset date to the Environment Commission!

Through public pressure and advocacy, the Streamlining Task Force just overturned its initial decision to eliminate the “Reentry Council,” showing public pressure works. Contact the Streamlining Task Force at CommissionStreamlining@sfgov.org to overturn eliminating the Urban Forestry Council too!

After all, any District Supervisor who approves any of the Mayor’s tree removal or commission reform “streamlining” goals should face recall from office, just as Joel Engardio was recalled!

— Patrick Monette-Shaw

497. Richie Vasquez (*ZIP code: 94103)*

498. Teresa Palmer (*ZIP code: 94117-1219)*

499. Arthur Paul Cartier (*ZIP code: 94117-1219)*

500. Laurel Myers (*ZIP code: 94107)*

501. Diana Anderson (*ZIP code: 94117)*
Trees give us livability in an increasingly concrete city. They reduce heat in summer, block some wind tunnels and exchange carbon dioxide for oxygen. They take a LONG TIME to GROW- but only an hour to destroy

502. Andrea Biltagi (*ZIP code: 94102)*

503. Frank Lorch (*ZIP code: 94122)*

504. Nicky Trasvina (*ZIP code: 94132)*
Please stop this attack on SF residents, SF trees, and SF birds. San Francisco, as beautiful as it is, still needs our trees for a healthier environment! We also need to follow the law when it comes to protecting our trees from any City department or developer whose intention is to destroy this vital environmental factor that contributes to the health and beauty of San Francisco. What would Saint Francis say ? !

505. An anonymous signer (*ZIP code: 94103)*

506. Jayme Kogel (*ZIP code: 94103)*

507. Paul Giese (*ZIP code: 94103)*

508. Wendy Oakes (*ZIP code: 94117)*
He just lost my vote. This is disgusting

509. Norm Ishimoto (*ZIP code: 94116-1246)*
We have had a Mayten in front of our house since, hmmm, 30 years? From a FUF campaign. SFPW has been erratic at irregular intervals, thankfully infrequent, in its attentions. Wife and I would be highly upset if we came home from shopping and found our Mayten was a stump or badly trimmed.

510. Linda R Miller (*ZIP code: 94121)*
PLEASE DO NOT CUT DOWN ANY TREES - THE BIRDS NEED THEM FOR MANY REASONS AND PEOPLE NEED BEAUTY AND SHADE.

511. Catherine Valentine (*ZIP code: 94127-2143)*

512. Nikhil Gowda (*ZIP code: 94103)*
File No. 251211 - Opposition to Appeals Ban

513. Daniel Dokovna (*ZIP code: 94103)*
Protect our trees.

514. Kelly Fitzgerald (*ZIP code: 94116)*
Plant trees!

515. Zachariah Spellman (*ZIP code: 94116)*
We need our trees to breathe the breeze.

516. Jake Hanft (*ZIP code: 94114)*

517. Barbara Save PRATO (*ZIP code: 94131-1161)*
Save our beautiful native _. I was shocked to see Washington Park without that tree. WHY? Please now replace with a _.

518. Julia Ready (*ZIP code: 94114)*
Cutting trees to
Improve sidewalks passage - can be replaced with trees that have a better root system.

519. Sybil Meyer (*ZIP code: 94131)*
SF doesn't need less foliage!

520. Leah Edwards (*ZIP code: 94103)*

521. Nancy Burrill (*ZIP code: 94109-6553)*

522. Eric Oesterling (*ZIP code: 94115)*

523. Carole Issel (*ZIP code: 94127-2212)*
I was born in San Francisco 82 years ago. The public must have the right to appeal when the City initiates a tree removal. Greenery purifies our air and gives space to our wildlife. Too many trees have been destroyed by the City already. We have to protect them.

524. Loren Jones (*ZIP code: 94127)*

525. Kasey Rios (*ZIP code: 94102)*
To be the vibrant world-class city San Francisco aims for we must increase investment in forest canopy.
This means: protecting the trees we have, planting trees proportionate to development and respecting public process.

526. Terence Craig (*ZIP code: 94109)*
Removing the right to appeal would, of course, streamline new development, but at a considerable cost to beauty of the city. I say keep the right of appeal.

527. David Singer (*ZIP code: 94103)*

528. Keith Robert Saggers (*ZIP code: 94133)*

529. Elissa Matross (*ZIP code: 94114)*
I love trees

530. Shawn Agarwal (*ZIP code: 94103)*
Trees are a part of our community and neighbors shouldn't be stripped of our rights to advocate for them if necessary to protect them.

531. Annie Pearson (*ZIP code: 94121)*
Daniel Lurie is just here for the billionaires. Gross.

532. Victoria Isyanova (*ZIP code: 94132)*

533. Linda Hayashi (*ZIP code: 94118)*

534. Tom Duffy (*ZIP code: 94127)*
We need more trees not less. It's terrible what Parks and Rec is doing at Golden Gate Parkl. They took down a healthy1 50 year old tree in the middle of Hellman meadow that was joy to behold. They also cut down many of the trees around the meadow. They are denuding Lake Merritt on the side

opposite to Fort Funston.

535. Brian Glennon (*ZIP code: 94132)*
Trees over developers!

536. Philip Schwartz (*ZIP code: 94107)*

537. Maryann Hrichak (*ZIP code: 94117)*

538. Jeanine Hawk (*ZIP code: 94116)*
Trees are an important part of our neighborhoods. Don’t let developers buy out.

539. Juliette Hayes (*ZIP code: 94118)*

540. Mahon McGrath (*ZIP code: 94110)*

541. Angela DePaul (*ZIP code: 94133)*

542. Ton-Yun Fang (*ZIP code: 94114)*

543. Ann MacAndrew (*ZIP code: 94112)*

544. Alexander Koodrin (*ZIP code: 94131)*

545. Sebra Leaves (*ZIP code: 94110)*
Why do you want to cut the trees that are sequestering the carbon that would otherwise go into the air and are a major source for cooling our city?

546. Allyson Browne (*ZIP code: 94131)*

547. Marc Brenman (*ZIP code: 94110)*

548. Shelby Morales (*ZIP code: 94015)*
Our trees and green spaces provide immeasurable benefit to the air we breathe and the wild birds and other critters which enrich our lives. They must be responsibly stewarded, not sold out to developers who’s primary concern is their bottom line.

549. Poppy Gilman (*ZIP code: 94122)*

From:	Claudia Stern
To:	Carroll, John (BOS); Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS)
Cc:	Shaun Aukland
Subject:	Public Comment - File No. 251211 - Opposition to Appeals Ban
Date:	Thursday, January 8, 2026 5:55:14 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Chair Melgar and Members of the Land Use Committee,

Please add these comments to the official legislative file for **File No. 251211**.

I have lived and voted in San Francisco since 1985. As a retiree, I now volunteer in the garden (Sutro Park) near my house. I am lucky to have an increasing number of trees on the streets near my home thanks to the Friends of the Urban Forest. These trees reduce heat and noise, provide water absorption during rainy periods, and provide habitat for living creatures. We need more trees to make SF an even better city.

I am writing to **OPPOSE** the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining"; it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.

Furthermore, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

Please **CONTINUE** this item until these democratic and equitable protections are restored.

Sincerely,
Claudia Stern
714 44th Avenue
415 318 6461

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more Click Here.

From: Tisay Baclay
To: Melgar, Myrna (BOS)
Cc: Chen, Chyanne (BOS); Carroll, John (BOS); Mahmood, Bilal (BOS); Board of Supervisors (BOS)
Subject: Subject: Public Comment – File No. 251211 – Opposition to Appeals Ban
Date: Wednesday, January 7, 2026 4:44:10 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Subject: Public Comment – File No. 251211 – Opposition to Appeals Ban

Dear Chair Melgar and Members of the Land Use Committee,

Please add these comments to the official legislative file for **File No. 251211**.

I am writing to **strongly OPPOSE** the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. While framed as administrative "streamlining," this provision fundamentally strips communities of their right to be heard and removes meaningful oversight over decisions that directly affect neighborhood health, environmental equity, climate resilience, and quality of life.

Under current law, when Public Works or another City agency seeks to remove mature trees, residents have the legal right to file an appeal and trigger a public hearing. This process is not theoretical - it works. File No. 251211 would eliminate this safeguard entirely.

The right to public participation and due process is not optional. It is protected under the **First and Fourteenth Amendments of the U.S. Constitution**, including the rights to free speech, to petition the government for redress of grievances, and to due process under the law. Fast-tracking legislation that removes appeal rights, especially when initiated by City departments themselves, raises serious constitutional concerns and undermines democratic governance. San Francisco must not become a city where community voices are treated as impediments rather than essential partners.

San Francisco has long been recognized as a leader in **environmental protection, climate justice, and civic engagement**. At a moment when residents are already absorbing sweeping budget cuts across healthcare, social services, outreach, housing stabilization, and environmental programs, this legislation further erodes trust and participation. The question before us is not whether the City can move

faster, but whether it can do so **without abandoning its values**.

Across the city, residents have stepped up beyond expectations - working in partnership with community-based nonprofits, organizing neighbors, and serving as frontline responders to the consequences of disinvestment. We are the ones operating at ground zero, engaging directly with impacted communities and protecting neighborhood-level environmental health. Removing public oversight ignores this lived experience and weakens outcomes.

I am also deeply concerned about an **equity loophole** in the legislation. While the bill allows developers to pay an In-Lieu Fee in place of planting trees, it fails to clearly define “low tree canopy” neighborhoods. Without a strict, data-driven definition that includes **canopy cover metrics and environmental burden scores**, these funds risk being allocated without regard to actual environmental need, undermining the very equity goals the policy claims to advance.

For these reasons, I respectfully request that the Committee **CONTINUE this item** until public appeal rights, constitutional protections, and clear environmental equity safeguards are fully restored.

Sincerely,
Teresa Dulalas
Resident - SoMa Pilipinas Filipino Cultural Heritage District 6

From:	Loren Craig Harrington
To:	Carroll, John (BOS); Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS)
Subject:	Public Comment - File No. 251211 - Opposition to Appeals Ban
Date:	Wednesday, January 7, 2026 1:18:47 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Chair Melgar and Members of the Land Use Committee,

Please add these comments to the official legislative file for File No. 251211.

I am writing to OPPOSE the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining"; it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.

Furthermore, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

Please CONTINUE this item until these democratic and equitable protections are restored.

Sincerely,

Craig Harrington
Twin Peaks SF

From: Barbara Bagot-López
To: Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS)
Cc: FielderStaff; Carroll, John (BOS); Board of Supervisors (BOS)
Subject: Public Comment - File No. 251211 - Opposition to Appeals Ban
Date: Wednesday, January 7, 2026 10:29:24 AM

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Hello, Chair Melgar & members of the Land Use Committee.

Please add my comments to the official legislative file for **File No. 251211**.

I OPPOSE the elimination of the public right to appeal city-initiated tree removals. Removing due process--removing the voice of SF residents--is not "streamlining"; it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.

In addition, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

Please CONTINUE this item until these democratic and equitable protections are restored.

Sincerely,
Barbara Bagot-López
Resident of Bernal Heights and San Francisco for 49 years who appreciates street trees

From:	Nikhil Gowda
To:	Carroll, John (BOS); Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS)
Subject:	Public Comment - File No. 251211 - Opposition to Appeals Ban
Date:	Wednesday, January 7, 2026 8:48:53 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Chair Melgar and Members of the Land Use Committee,

Please add these comments to the official legislative file for **File No. 251211**.

I am writing to **OPPOSE** the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining"; it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.

Furthermore, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

Please **CONTINUE** this item until these democratic and equitable protections are restored.

Sincerely,

Nikhil Gowda

West SoMa resident and home owner.

From:	Mc Mc 1
To:	Carroll, John (BOS); Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS)
Subject:	legislative File No. 251211. OPPOSE eliminating public appeal for tree removal
Date:	Tuesday, January 6, 2026 11:05:42 PM

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Dear Chair Melgar and Members of the Land Use Committee,
Please add these comments to the official legislative file for **File No. 251211**.
I am writing to **OPPOSE** the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining"; it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.
Furthermore, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.
Please **CONTINUE** this item until these democratic and equitable protections are restored.
Sincerely,
Mary McFadden
Anza VIsta

From:	Frank Lorch
To:	Carroll, John (BOS); Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS)
Subject:	Public Comment - File No. 251211 - Opposition to Appeals Ban
Date:	Tuesday, January 6, 2026 8:35:02 PM

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Dear Chair Melgar and Members of the Land Use Committee,

Please add these comments to the official legislative file for **File No. 251211**.

I am writing to **OPPOSE** the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining"; it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.

Furthermore, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

Please **CONTINUE** this item until these democratic and equitable protections are restored.

Sincerely,
Frank Lorch
Sunset

From:	Andrea Biltagi
To:	Carroll, John (BOS); Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS)
Subject:	Public Comment - File No. 251211 - Opposition to Appeals Ban
Date:	Tuesday, January 6, 2026 7:59:59 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Chair Melgar and Members of the Land Use Committee,

Please add these comments to the official legislative file for **File No. 251211**.

I am writing to **OPPOSE** the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining"; it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.

Furthermore, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

Please **CONTINUE** this item until these democratic and equitable protections are restored.

Sincerely,

Andrea Biltagi

Tenderloin, 94102

From:	Laurel Myers
To:	Carroll, John (BOS); Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS)
Subject:	Public Comment - File No. 251211 - Opposition to Appeals Ban
Date:	Tuesday, January 6, 2026 7:46:40 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Chair Melgar and Members of the Land Use Committee,

Please add these comments to the official legislative file for **File No. 251211**.

I am writing to **OPPOSE** the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining"; it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.

Furthermore, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

Please **CONTINUE** this item until these democratic and equitable protections are restored.

Sincerely,

Laurel Myers, SoMA resident

From:	Amanda Rodriguez
To:	Carroll, John (BOS); Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS)
Subject:	Public Comment - File No. 251211 - Opposition to Appeals Ban
Date:	Tuesday, January 6, 2026 6:57:16 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Chair Melgar and Members of the Land Use Committee,

Please add these comments to the official legislative file for **File No. 251211**.

I am writing to **OPPOSE** the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining"; it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.

Furthermore, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

Please **CONTINUE** this item until these democratic and equitable protections are restored.

Sincerely,

Amanda Rodriguez

Glen Park resident

From:	Rebecca Hardy
To:	Carroll, John (BOS); Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS)
Subject:	Public Comment - File No. 251211 - Opposition to Appeals Ban
Date:	Tuesday, January 6, 2026 6:54:21 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Chair Melgar and Members of the Land Use Committee,

Please add these comments to the official legislative file for **File No. 251211**.

I am writing to **OPPOSE** the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining;" it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.

Furthermore, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

Please **CONTINUE** this item until these democratic and equitable protections are restored.

Sincerely,

Rebecca Hardy, Potrero Hill

From:	Josh Jagerman
To:	Carroll, John (BOS); Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS)
Subject:	Public Comment - File No. 251211 - Opposition to Appeals Ban
Date:	Tuesday, January 6, 2026 6:21:25 PM

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Dear Chair Melgar and Members of the Land Use Committee,

Please add these comments to the official legislative file for **File No. 251211**.

I am writing to **OPPOSE** the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining"; it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.

Furthermore, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

Please **CONTINUE** this item until these democratic and equitable protections are restored.

Sincerely,

Josh Jagerman

From:	Collin Tharp
To:	Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS); Carroll, John (BOS)
Subject:	Public Comment - File No. 251211 - Opposition to Appeals Ban
Date:	Tuesday, January 6, 2026 5:20:43 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Chair Melgar and Members of the Land Use Committee,

Please add these comments to the official legislative file for **File No. 251211**.

I am writing to **OPPOSE** the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining"; it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.

Furthermore, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

Please **CONTINUE** this item until these democratic and equitable protections are restored.

Sincerely,

Collin Tharp

Potrero Hill

From:	Shalmali Bane
To:	Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS); Carroll, John (BOS)
Subject:	Public Comment - File No. 251211 - Opposition to Appeals Ban
Date:	Tuesday, January 6, 2026 4:51:11 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Chair Melgar and Members of the Land Use Committee,

Please add these comments to the official legislative file for **File No. 251211**.

I am writing to **OPPOSE** the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining"; it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.

Furthermore, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

Please **CONTINUE** this item until these democratic and equitable protections are restored.

Sincerely,

Shalmali Bane, SOMA west neighborhood

From: Abigail Kroch
To: Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS); Carroll, John (BOS)
Subject: Public Comment - File No. 251211 - Opposition to Appeals Ban
Date: Tuesday, January 6, 2026 4:35:52 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

- Dear Chair Melgar and Members of the Land Use Committee,

  Please add these comments to the official legislative file for **File No. 251211**.

  I am writing to **OPPOSE** the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining"; it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.

  Furthermore, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

  Please **CONTINUE** this item until these democratic and equitable protections are restored.

  Sincerely,

  Abigail Kroch, SoMa resident

From:	Alice Rogers
To:	Carroll, John (BOS); Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS)
Subject:	Public Comment - File No. 251211 - Opposition to Appeals Ban
Date:	Tuesday, January 6, 2026 4:21:11 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Chair Melgar and Members of the Land Use Committee,

Please add these comments to the official legislative file for **File No. 251211**.

As a decades-long tree advocate and FUF member, I am writing to **OPPOSE** the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining"; it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.

Additionally, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

Please **CONTINUE** this item until these democratic and equitable protections are restored. We need to get this right.

Respectfully,

Alice Rogers

.....

Alice Rogers
10 South Park St
Studio 2
San Francisco, CA 94107

arcomnsf@pacbell.net

From:	Anna Papitto
To:	Carroll, John (BOS); Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS)
Subject:	Public Comment - File No. 251211 - Opposition to Appeals Ban
Date:	Tuesday, January 6, 2026 4:06:40 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Chair Melgar and Members of the Land Use Committee,

Please add these comments to the official legislative file for **File No. 251211**.

I am writing to **OPPOSE** the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining"; it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.

Furthermore, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

Please **CONTINUE** this item until these democratic and equitable protections are restored.

Sincerely, Anna Papitto, Noe Valley

From:	Christine S.
To:	Carroll, John (BOS); Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS); DorseyStaff (BOS)
Subject:	Public Comment - File No. 251211 - Opposition to Appeals Ban
Date:	Tuesday, January 6, 2026 3:56:18 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Chair Melgar and Members of the Land Use Committee,

Please add these comments to the official legislative file for **File No. 251211**.

I am writing to **OPPOSE** the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining"; it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction. The City of San Francisco needs to be adding more trees to beautify the sad streets in SF. I've been trying for 5 years just to get one tree planted after a car crashed into the gorgeous healthy ficus that adorned my street in SOMA. This is shameful. A missed opportunity to have a city that deserves to showoff its natural beauty.

Furthermore, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

Please **CONTINUE** this item until these democratic and equitable protections are restored.

Sincerely,

Christine Segalas
District 6 (SOMA)

From:	Shamika Klassen
To:	Carroll, John (BOS); Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS)
Subject:	Public Comment - File No. 251211 - Opposition to Appeals Ban
Date:	Tuesday, January 6, 2026 3:31:15 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Chair Melgar and Members of the Land Use Committee,

Please add these comments to the official legislative file for **File No. 251211**.

I am writing to **OPPOSE** the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining"; it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.

Furthermore, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

Please **CONTINUE** this item until these democratic and equitable protections are restored.

Sincerely,

Dr. Shamika Klassen, Alamo Square Neighborhood

From:	Ruby Rieke
To:	Carroll, John (BOS); Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS)
Subject:	Public Comment - File No. 251211 - Opposition to Appeals Ban
Date:	Tuesday, January 6, 2026 3:30:19 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Chair Melgar and Members of the Land Use Committee,

Please add these comments to the official legislative file for **File No. 251211**.

I am writing to **OPPOSE** the provision in this legislation that eliminates the public's right to appeal city-initiated tree removals. Removing due process is not "streamlining"; it is a removal of critical oversight that has historically saved mature trees from unnecessary destruction.

Furthermore, I request that the legislation be amended to strictly define "low tree canopy" neighborhoods with a data-driven methodology that includes canopy cover and environmental burden scores. Without this definition, the In-Lieu Fee risks becoming a slush fund that fails to serve the neighborhoods with the highest environmental burden.

Please **CONTINUE** this item until these democratic and equitable protections are restored.

Sincerely, Ruby Rieke Mission District

From:	Shaun Aukland
To:	CPC-Commissions Secretary; Carroll, John (BOS); Dennis Phillips, Sarah (CPC)
Cc:	Ionin, Jonas (CPC); Board of Supervisors (BOS); Melgar, Myrna (BOS); Mahmood, Bilal (BOS); Chen, Chyanne (BOS)
Subject:	Opposition & CEQA Objection: File No. 251211 (Street Tree Ordinance)
Date:	Monday, January 5, 2026 12:34:38 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear President So, Chair Melgar, Supervisors, and Commissioners,

I am writing on behalf of FairTrees.org to formally oppose File No. 251211 and to object to the Planning Department's CEQA determination. Please also add this to the legislative file.

1. CEQA Objection. The legislative file states this ordinance is "Not defined as a project... because it would not result in a direct or indirect physical change in the environment." We dispute this finding. The legislation eliminates the public's right to appeal city-initiated tree removals. Historical data proves that the appeals process has successfully preserved hundreds of mature trees that the City intended to remove (e.g., Mission Verde, 24th St).

If the appeals process prevents tree removal, then removing the appeals process will logically result in the destruction of trees that otherwise would have been saved.

This will have an obvious impact to the city's physical environment. A reduction in urban canopy is a physical change to the environment that increases heat islands and reduces air quality. This requires environmental review, not an exemption. As our orgainzation has communicated before, Enivornment Justice Communities like SOMA, the Tenderloin, Bayview Hunter's Point, and others are largely *losing* canopy, not gaining it. Ongoing projects like the Folsom / Howard Streetscape projects that have removed dozens of trees, and only added marginally.

2. The "Equity" Justification is Not Defined. The "In-Lieu Fee" Loophole The bill allows developers to pay fees to plant trees in "neighborhoods with low canopy" but fails to define that term. Without a data-driven definition (like "Equity Priority Communities"), this creates a slush fund where fees generated in high-need districts like SoMa (2.7% canopy) can be diverted to wealthier areas. We have seen this **over and over**, with the federal Inflation Reduction Act grant, as well as Prop L funds. Our organization has been analyzing canopy data from US Forestry, and can provide this to make this a more data-driven process.

3. SF Citizens Lose Their Last Remaining Voice in Trees: Stripping residents of the right to appeal City decisions removes the only check and balance against administrative overreach, and eliminates due process.. This is not streamlining; it is silencing.

We urge you to CONTINUE this item until the CEQA determination is corrected and these amendments are made.

Sincerely,

Shaun Aukland
FairTrees.org

From: Michael Nulty
To: Carroll, John (BOS)
Cc: Melgar, Myrna (BOS); Chen, Chyanne (BOS); Mahmood, Bilal (BOS)
Subject: Opposition to File No. 251211
Date: Friday, January 2, 2026 11:12:47 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Members of the San Francisco Board of Supervisors,

The Alliance for a Better District 6 and many of its affiliate partners are writing in strong opposition to the proposed amendments in File No. 251211, which seek to weaken San Francisco's urban forestry protections by expanding in-lieu fees for street tree planting, exempting accessory dwelling units (ADUs) from planting requirements, eliminating appeals for tree removals by City departments and commissions, and shifting notices to online postings only. These changes prioritize development efficiency over environmental sustainability, public accountability, and the long-term health of our city. San Francisco's tree canopy is already critically low at 13.7%, and these amendments risk further erosion at a time when California grapples with climate change, persistent droughts, and catastrophic wildfires—while the City faces severe budget deficits projected to reach nearly $1 billion in coming years. Below, we outline key points of opposition, drawing from the ordinance details, comparisons to other California cities, and broader environmental and fiscal concerns.

Key Points of Opposition:

1. **Erosion of Mandatory Tree Planting and Immediate Greenery Benefits—Especially Critical Amid Budget Shortfalls**:
    - The proposal allows any development project to pay an in-lieu fee (currently around $2,590 per tree) instead of planting required street trees, even when planting is feasible. This shifts from the current system, where waivers are granted only for impossibility, impracticality, or safety issues, and alternatives like sidewalk landscaping are limited.
    - Exempting ADUs and Junior ADUs from tree requirements ignores their cumulative impact on urban density. New developments without on-site trees exacerbate urban heat islands, increase storm water runoff, and diminish local biodiversity—issues amplified by California's ongoing drought, which has led to water restrictions and heightened fire risks.
    - In recent years, **new development has become one of San Francisco's primary alternative ways new trees get planted**, due to chronic underfunding of city agencies like Public Works' Urban Forestry Bureau. With historic budget deficits—including an $800 million shortfall addressed in the FY 2025-2026 budget and projections of up to $1 billion in future cycles—core urban forestry programs face constraints, reductions in

positions, and reliance on grants or voter-set-asides. In-lieu fees, deposited into the Adopt-A-Tree Fund, may fund future plantings but often result in delayed or off-site actions that fail to benefit the immediate community. Expanding these fees risks reducing even this key source of new trees, when we desperately need more planted now, not deferred payments that could be further strained by ongoing fiscal pressures.

2. **Elimination of Public Appeals and Reduced Transparency**:
    - Under existing law, decisions on street tree removals (including hazard trees) by the Department of Public Works (DPW) or other City agencies are appealable first to the DPW Director and then to the Board of Appeals, with robust noticing via postings, newspapers, and notifications to abutters and organizations.
    - The amendments make these decisions final and nonappealable, limiting public input and oversight. This is particularly concerning for non-hazard trees, where 15-day objection periods currently allow hearings.
    - Replacing newspaper notices with website postings reduces accessibility for non-digital-savvy residents, potentially excluding vulnerable communities.
    - In contrast, many other California cities maintain strong appeal processes to ensure accountability:
        - Beverly Hills: Appeals to the Planning Commission (Municipal Code Title 10, Chapter 3).
        - Pacifica: 10-day appeal period to Planning Commission, with further escalation to City Council (Title 4, Chapter 12).
        - Los Altos: 10-day public notification for appeals to City Clerk.
        - Mountain View: Appeals to Urban Forestry Board or City Council within 10 days.
        - Santa Cruz: Appeals to Parks and Recreation Commission for heritage trees.
        - Saratoga: 15-day appeal window for nearby homeowners.
        - San Luis Obispo: Appeals to Tree Committee.
        - Santa Monica: Reviews by Urban Forest Task Force.
        - Pasadena: Standard zoning code appeals for tree protections.
    - These models demonstrate that appeals foster community trust and prevent arbitrary removals, unlike the proposed streamlining, which could lead to unchecked tree loss.
3. **Exacerbation of Environmental and Climate Challenges**:
    - San Francisco's urban forest enhances walkability, livability, and sustainability by filtering air pollutants, sequestering carbon, and providing shade—essential amid California's wildfires, which have scorched millions of acres and degraded air quality statewide (e.g., the 2020 fires blanketed the Bay Area in smoke).

- Without mandatory planting, new developments contribute to climate change by increasing heat retention and energy use for cooling, while reducing natural defenses against drought-induced water scarcity.
- Trees clean the air of wildfire particulates and support resilience against extreme weather; removing appeal processes risks hasty removals that diminish this buffer. California needs more trees, not fewer, to combat these interconnected crises—yet this ordinance balances toward developer certainty over ecological necessity.

4. **Inconsistency with Broader Policies and Public Welfare**:
    - The ordinance affirms compliance with the California Environmental Quality Act (CEQA), General Plan, and Planning Code Section 101.1, but these amendments undermine the spirit of sustainability and public welfare findings under Section 302.
    - By prioritizing efficiency in development, it overlooks the long-term costs: poorer air quality, higher health risks from heat and pollution, and reduced property values in less green neighborhoods—compounded by budget constraints that already limit proactive planting.
    - Alternative landscaping options (e.g., 75 sq ft per waived tree) are insufficient substitutes, as they lack the full ecological benefits of mature trees.

In summary, these amendments threaten to stall progress on expanding San Francisco's meager tree canopy, diminish public participation, reduce a vital source of new plantings amid fiscal challenges, and heighten vulnerability to climate threats. The Alliance for a Better District 6 and many of its affiliate partners urge you to reject File No. 251211 and instead reinforce protections that mandate on-site planting, preserve appeals, and prioritize urban greening. Our city's future depends on robust environmental policies, not shortcuts that favor short-term gains.

Sincerely,

Michael Nulty
Alliance for a Better District 6
Executive Director

Michael Nulty

P.O. Box 420782
San Francisco, CA 94142-0782
(415) 339-8327 - Direct
(415) 339-8779 - Alliance for a Better District 6
http://abd6.cfsites.org/

From:	Board of Supervisors (BOS)
To:	BOS-Supervisors; BOS-Legislative Aides
Cc:	BOS-Operations; Carroll, John (BOS); Calvillo, Angela (BOS); De Asis, Edward (BOS); Entezari, Mehran (BOS); Mchugh, Eileen (BOS); Ng, Wilson (BOS); Somera, Alisa (BOS)
Subject:	2 Letters Regarding File No. 251211
Date:	Tuesday, December 30, 2025 9:37:15 AM
Attachments:	2 Letters Regarding File No. 251211.pdf

Hello,

Please see attached 2 letters regarding **File No. 251211:**

Ordinance amending the Public Works Code to allow development projects to satisfy street tree planting requirements through payment of an in lieu fee or providing alternative landscaping; exempt accessory dwelling units from street tree planting requirements; eliminate appeals to the Board of Appeals for tree removals undertaken by City departments and commissions; and update in lieu fee reporting requirements; amending the Administrative Code to create a separate account within the Adopt-A-Tree Fund to receive in lieu fees for street tree requirements; amending the Planning Code to update street tree applicability requirements; affirming the Planning Department's determination under the California Environmental Quality Act; making findings of consistency with the General Plan, and the eight priority policies of Planning Code, Section 101.1; and making public necessity, convenience, and welfare findings under Planning Code, Section 302.

Regards,

John Bullock
Office of the Clerk of the Board
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
(415) 554-5184
BOS@sfgov.org | www.sfbos.org

Disclosures: *Personal information that is provided in communications to the Board of Supervisors is subject to disclosure under the California Public Records Act and the San Francisco Sunshine Ordinance. Personal information provided will not be redacted. Members of the public are not required to provide personal identifying information when they communicate with the Board of Supervisors and its committees. All written or oral communications that members of the public submit to the Clerk's Office regarding pending legislation or hearings will be made available to all members of the public for inspection and copying. The Clerk's Office does not redact any information from these submissions. This means that personal information—including names, phone numbers, addresses and similar information that a member of the public elects to submit to the Board and its committees—may appear on the Board of Supervisors website or in other public documents that members of the public may inspect or copy.*

From: San Francisco Tree Campaign
To: Board of Supervisors (BOS)
Cc: Carroll, John (BOS); Ionin, Jonas (CPC)
Subject: Opposition to File No. 251211 – Urban Forestry Amendments
Date: Friday, December 19, 2025 1:43:02 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Opposition to File No. 251211 – Urban Forestry Amendments

I am writing in strong opposition to the proposed amendments in **File No. 251211**, which would weaken San Francisco's urban forestry protections by:

- Allowing developers to satisfy street tree requirements through in-lieu fees or undefined "alternative landscaping,"
- Exempting ADUs and JADUs from tree planting requirements,
- Eliminating the public's right to appeal tree removals initiated by City departments and commissions, and
- Replacing existing public notice requirements with online postings only.

Taken together, these changes prioritize administrative convenience over environmental sustainability, public accountability, and the long-term health and resilience of San Francisco.

1. In-Lieu Fees Will Reduce Tree Planting at a Time We Can Least Afford It

San Francisco's tree canopy is critically low—approximately **13–14%**, among the smallest of any major U.S. city. New development has become one of the *primary remaining mechanisms* through which new street trees are planted, largely because City planting capacity is chronically underfunded.

Allowing developers to opt out of planting trees by paying an in-lieu fee (currently ~$2,600 per tree) will result in **fewer trees planted, full stop**. The fee does not cover the true cost of planting, watering, and replacing trees over their three-year establishment period, nor does it compensate for lost planting opportunities when new frontages are designed to permanently preclude trees.

This shift is especially troubling given the City's ongoing fiscal crisis. With projected deficits approaching **$1 billion**, Public Works and its Urban Forestry Bureau already lack the operational capacity to convert in-lieu fees into timely, neighborhood-level plantings. Deferred payments do not cool streets, clean air, or support public health.

Exempting ADUs and JADUs further compounds this problem. While small individually, their cumulative impact on density, heat islands, and storm water runoff is significant—particularly in neighborhoods already lacking canopy.

2. Eliminating Appeals for City-Initiated Tree Removals Removes Oversight—Not Red Tape

The proposal to eliminate appeals to the Board of Appeals for tree removals undertaken by City departments does **not** meaningfully expedite housing or private development. City-initiated removals are overwhelmingly associated with public works and infrastructure projects, not private construction.

Appeals serve a critical function: they require departments to justify removals publicly and have repeatedly led to **better outcomes**, including:

- Preservation of healthy trees,
- Revised designs that accommodate both infrastructure and canopy,
- Increased replacement ratios, and
- Innovative community partnerships such as **Mission Verde**, which now serves as a model for volunteer-supported tree watering and green jobs.

Removing appeals eliminates one of the City's only effective oversight mechanisms for urban forestry decisions and creates a real risk of abuse—encouraging developers to pressure City agencies to initiate removals on their behalf, at taxpayer expense, with no public recourse.

3. Reduced Public Notice Undermines Transparency and Equity

Replacing established notice requirements with website-only postings will disproportionately exclude residents who lack reliable internet access, have language barriers, or are otherwise disconnected from digital-only processes. Tree removals affect public space, neighborhood health, and climate resilience; they warrant robust, accessible notice and public participation.

Notably, many California cities—including Beverly Hills, Mountain View, Santa Cruz, Pasadena, and others—maintain clear appeal processes for tree removals. San Francisco would be moving *backward* by eliminating them.

4. These Amendments Conflict with Climate, Equity, and Public Health Goals

Urban trees are essential infrastructure. They reduce extreme heat, filter air pollution (including wildfire smoke), manage storm water, support biodiversity, and improve mental and physical health. Weakening planting requirements and oversight contradicts the City's Climate Action Plan, General Plan sustainability goals, and stated equity commitments—particularly as climate impacts intensify statewide.

Conclusion

File No. 251211 risks accelerating canopy loss, reducing public trust, and undermining San Francisco's climate resilience at precisely the wrong moment. I urge you to reject these amendments and instead pursue policies that:

- Preserve mandatory, on-site tree planting whenever feasible,
- Maintain the public's right to appeal City-initiated tree removals,
- Strengthen—not weaken—public notice requirements, and
- Invest in scalable City–community partnerships that expand planting and watering capacity.

San Francisco needs **more trees, more accountability, and more public engagement**, not fewer of each.

Respectfully submitted,

John Nulty co-chair San Francisco Tree Campaign

https://sanfranciscotreecampaign.blogspot.com

From: Tenderloin Tree Campaign 2004
To: Board of Supervisors (BOS)
Cc: Carroll, John (BOS); Ionin, Jonas (CPC)
Subject: Opposition to File No. 251211
Date: Friday, December 19, 2025 2:00:37 PM

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Executive Summary and Analysis of Proposed Amendments Affecting San Francisco's Tree Canopy

Overview of Proposed Amendments

The proposed amendments under review in San Francisco include two primary changes:

1. **Street Tree Planting Requirements:** Developers may satisfy street tree planting obligations by either:
   Planting trees,
   Paying an in lieu fee (currently about $2,590 per tree),
   Or providing alternative landscaping (a vaguely defined option that excludes street trees).
2. **Elimination of Public Appeals:** The public's right to appeal tree removals initiated by City departments and commissions to the Board of Appeals would be removed, making such removals final and non appealable.

Key Concerns and Critique

1. Impact on San Francisco's Tree Canopy

Reduction in Actual Tree Planting: Allowing developers to pay fees or provide alternative landscaping instead of planting trees will likely reduce the number of new trees planted. The current in lieu fee barely covers the full cost of planting and maintaining trees, including replacement of dead or damaged trees.
Undefined "Alternative Landscaping": The term is vague and explicitly excludes street trees, which means no guaranteed net gain or even maintenance of the current canopy.
Operational Capacity Limits: The City's Public Works department and its nonprofit partner, Friends of the Urban Forest (FUF), lack sufficient resources and coordination capacity to meet tree planting and maintenance goals effectively.
Watering and Maintenance Challenges: Ongoing watering for about three years after planting is critical but underfunded. The $19 million annual StreetTreeSF budget is legally restricted to maintenance of existing trees, not planting or watering new ones, limiting successful establishment of new trees.

2. Elimination of Public Appeals for City-Initiated Tree Removals

Loss of Oversight and Accountability: Removing the public's right to appeal tree removals initiated by City departments eliminates an important check on City actions, reducing transparency and public input.
No Real Efficiency Gain: Appeals currently take 6-8 weeks and are not a significant bottleneck to development. Eliminating appeals does not meaningfully expedite projects but removes public scrutiny.
Risk of Corruption and Reduced Public Input: Without appeals, developers might pressure the City to remove trees on public land to avoid scrutiny, shifting costs to taxpayers and reducing transparency.

Context: Importance of Urban Trees in San Francisco

Critical Role of Urban Forests: Urban trees contribute significantly to climate resilience, public health, and social equity by reducing urban heat, improving air quality, and enhancing community well-being.
San Francisco's Tree Canopy Status: The city's tree canopy covers about 13.7% of the urban area, one of the smallest among major U.S. cities. Protections mainly cover street trees and significant trees near sidewalks; trees in parks and private yards are largely unregulated.
Historical Policy Changes: Before 2017, property owners maintained street trees, limiting growth due to cost concerns. Proposition E (2017) shifted maintenance responsibility to Public Works with a dedicated budget, but this funding cannot be used for planting or watering new trees, only for maintenance and sidewalk repairs.

Financial and Operational Realities

Aspect	Current Situation	Impact of Proposed Amendments
In Lieu Fee Amount	Approximately $2,590 per tree, barely covers planting and watering costs	Encourages fee payment over actual planting, reducing canopy growth
Tree Planting Funding	Patchwork, unreliable, mostly volunteer-driven	No new dedicated funding; watering remains a bottleneck
	Limited Public	Increased demand without

Operational Capacity	Works and FUF resources	capacity increase will hinder planting efforts
Public Oversight	Board of Appeals hears appeals on tree removals	Eliminating appeals removes public checks and balances

Answers to Your Specific Questions

What are the proposed alternatives?

Developers can satisfy street tree planting requirements by:
Planting trees,
Paying an in lieu fee,
Or providing “alternative landscaping,” a vaguely defined option that excludes street trees and does not guarantee canopy growth.

How much is the in lieu fee?

The in lieu fee is currently approximately $2,590 per tree.

What is the current tree canopy percentage?

San Francisco’s urban tree canopy is approximately 13.7%, one of the lowest among major U.S. cities.

Who is FUF?

Friends of the Urban Forest (FUF) is a nonprofit partner organization that collaborates with the City’s Public Works department to plant and maintain urban trees in San Francisco. FUF plays a critical role in volunteer-driven tree planting and maintenance efforts but faces resource constraints.

Opposition Points and Broader Concerns

The amendments prioritize development efficiency over environmental sustainability, public accountability, and the long-term health of San Francisco’s urban forest.
Exempting accessory dwelling units (ADUs) from tree planting requirements ignores their cumulative impact on urban density and environmental quality.
The elimination of public appeals and reduction of public notices to online postings only reduces transparency and public participation, disproportionately affecting vulnerable and digitally disconnected communities.
Other California cities maintain robust appeal processes for tree removals,

fostering community trust and preventing arbitrary removals.
Given San Francisco’s budget deficits and climate challenges, weakening tree protections risks exacerbating urban heat islands, storm water runoff, biodiversity loss, and public health issues.

Potential Alternatives and Solutions (Brief Mention)

The document suggests exploring balanced policy solutions that support both expedited development and urban canopy growth.
Possible approaches include:
- Increasing the in lieu fee to reflect true planting and maintenance costs,
- Defining and incentivizing meaningful alternative landscaping that includes canopy benefits,
- Securing dedicated funding for planting and watering new trees,
- Maintaining public appeal rights to ensure transparency and accountability,
- Enhancing operational capacity of Public Works and FUF through increased funding and coordination.

Conclusion

The proposed amendments, as currently drafted, pose significant risks to San Francisco’s urban tree canopy by reducing actual tree planting, weakening public oversight, and failing to address critical operational and financial challenges. The elimination of public appeals undermines transparency and accountability without delivering meaningful efficiency gains. A more nuanced and balanced approach is essential to protect and grow San Francisco’s urban forest while supporting sustainable development.

The in lieu fee in San Francisco is currently set at approximately **$2,590 per tree**. This fee is designed to cover the city's estimated cost to plant and water a tree for three years. The rationale behind the fee is to allow developers to pay this amount instead of planting trees directly, with the city then responsible for planting and maintaining trees elsewhere.

However, this fee has been criticized as barely sufficient to cover the full costs involved, including planting, watering, and maintaining the trees over time. Because of this, there is concern that allowing developers to pay the fee instead of planting trees on-site may reduce the overall number of new trees planted and hinder the growth of San Francisco’s urban canopy.
The fee is part of a broader discussion about balancing development needs with environmental sustainability and urban forestry goals in the city.

Improving operational capacity for urban tree planting and maintenance in San Francisco involves addressing several key challenges related to resources, coordination, funding, and community engagement. Here are detailed strategies that could enhance the city’s ability to effectively plant and maintain its urban forest:

1. Increase Dedicated Funding and Resources

Secure New Funding Streams: Establish dedicated budgets specifically for tree planting and post-planting care (watering, pruning, replacement). Current funds like the $19 million Street Tree SF budget are restricted to maintenance of existing trees, limiting new planting efforts.
Leverage Grants and Partnerships: Pursue grants from state and federal environmental programs, climate resilience funds, and private foundations to supplement city budgets.
Expand Staffing: Increase the number of trained arborists, horticulturists, and maintenance crews within Public Works and partner organizations like Friends of the Urban Forest (FUF).

2. Enhance Coordination and Project Management

Centralized Urban Forestry Unit: Create or strengthen a dedicated urban forestry division within Public Works with clear responsibility for planting, maintenance, and community outreach.
Cross-Department Collaboration: Improve coordination between Public Works, Recreation and Parks, Planning, and other relevant departments to streamline tree-related projects and avoid duplication or gaps.
Use of Technology: Implement GIS mapping, tree inventory databases, and project management software to track tree locations, health, watering schedules, and maintenance needs efficiently.

3. Improve Watering and Maintenance Capacity

Innovative Watering Solutions: Invest in irrigation infrastructure such as drip irrigation, rainwater harvesting, and smart watering systems to reduce labor and water use.
Volunteer and Community Programs: Expand volunteer watering programs and community stewardship initiatives, providing training and resources to residents and neighborhood groups.
Contractor Partnerships: Develop long-term contracts with specialized tree care companies to ensure consistent and professional maintenance services.

4. Policy and Regulatory Support

Adjust In Lieu Fees: Increase fees to reflect true costs of planting and maintenance, ensuring funds are sufficient to support operational needs.
Mandate Developer Contributions: Require developers to contribute not only planting fees but also ongoing maintenance funding or services.
Enforce Planting Requirements: Limit or carefully regulate alternatives to tree planting to ensure canopy growth goals are met.

5. Public Engagement and Education

Awareness Campaigns: Educate the public on the importance of urban trees and

how they can participate in planting and maintenance.
Community Partnerships: Collaborate with nonprofits, schools, and neighborhood groups to foster local stewardship and expand capacity.

Summary

Improving operational capacity requires a multifaceted approach combining increased funding, enhanced coordination, technological support, innovative maintenance practices, stronger policies, and active community involvement. These measures will help San Francisco meet its urban forestry goals, ensuring sustainable growth and health of its tree canopy amid development pressures and environmental challenges.

Improving operational capacity for urban tree planting and maintenance in San Francisco involves addressing several key challenges related to resources, coordination, funding, and community engagement. Here are detailed strategies that could enhance the city's ability to effectively plant and maintain its urban forest:

How much funding is needed?

To effectively support San Francisco's urban forestry goals, including planting, watering, maintenance, and staffing, recent estimates indicate that a fully funded citywide urban forestry program would require about $20 million annually. This level of funding is necessary to overcome current resource constraints and ensure sustainable growth and health of the city's tree canopy.

From: Wong, Jocelyn (BOS)
To: Carroll, John (BOS)
Subject: FW: Opposition to File No. 251211 – Urban Forestry Amendments
Date: Monday, December 29, 2025 8:40:15 AM

Not sure if you received this..

Best regards,
Jocelyn Wong
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
T: 415.554.7702 | F: 415.554.5163
jocelyn.wong@sfgov.org | www.sfbos.org

(VIRTUAL APPOINTMENTS) To schedule a "virtual" meeting with me (on Microsoft Teams), please ask and I can answer your questions in real time.

Due to the current COVID-19 health emergency and the Shelter in Place Order, the Office of the Clerk of the Board is working remotely while providing complete access to the legislative process and our services

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-----Original Message-----
From: San Francisco Tree Campaign <sftreecampaign@gmail.com>
Sent: Friday, December 19, 2025 1:43 PM
To: Board of Supervisors (BOS) <board.of.supervisors@sfgov.org>
Cc: Carroll, John (BOS) <john.carroll@sfgov.org>; Ionin, Jonas (CPC) <jonas.ionin@sfgov.org>
Subject: Opposition to File No. 251211 – Urban Forestry Amendments

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Opposition to File No. 251211 – Urban Forestry Amendments

I am writing in strong opposition to the proposed amendments in File No. 251211, which would weaken San Francisco's urban forestry protections by:

* Allowing developers to satisfy street tree requirements through in-lieu fees or undefined "alternative landscaping,"
* Exempting ADUs and JADUs from tree planting requirements,
* Eliminating the public's right to appeal tree removals initiated by City departments and commissions, and
* Replacing existing public notice requirements with online postings only.

Taken together, these changes prioritize administrative convenience over environmental sustainability, public accountability, and the long-term health and resilience of San Francisco.

1. In-Lieu Fees Will Reduce Tree Planting at a Time We Can Least Afford It

San Francisco's tree canopy is critically low—approximately 13–14%, among the smallest of any major U.S. city. New development has become one of the primary remaining mechanisms through which new street trees are planted, largely because City planting capacity is chronically underfunded.

Allowing developers to opt out of planting trees by paying an in-lieu fee (currently ~$2,600 per tree) will result in fewer trees planted, full stop. The fee does not cover the true cost of planting, watering, and replacing trees over their three-year establishment period, nor does it compensate for lost planting opportunities when new frontages are designed to permanently preclude trees.

This shift is especially troubling given the City's ongoing fiscal crisis. With projected deficits approaching $1 billion, Public Works and its Urban Forestry Bureau already lack the operational capacity to convert in-lieu fees into timely, neighborhood-level plantings. Deferred payments do not cool streets, clean air, or support public health.

Exempting ADUs and JADUs further compounds this problem. While small individually, their cumulative impact on density, heat islands, and storm water runoff is significant—particularly in neighborhoods already lacking canopy.

2. Eliminating Appeals for City-Initiated Tree Removals Removes Oversight—Not Red Tape

The proposal to eliminate appeals to the Board of Appeals for tree removals undertaken by City departments does not meaningfully expedite housing or private development. City-initiated removals are overwhelmingly associated with public works and infrastructure projects, not private construction.

Appeals serve a critical function: they require departments to justify removals publicly and have repeatedly led to better outcomes, including:

* Preservation of healthy trees,
* Revised designs that accommodate both infrastructure and canopy,
* Increased replacement ratios, and
* Innovative community partnerships such as Mission Verde, which now serves as a model for volunteer-supported tree watering and green jobs.

Removing appeals eliminates one of the City's only effective oversight mechanisms for urban forestry decisions and creates a real risk of abuse—encouraging developers to pressure City agencies to initiate removals on their behalf, at taxpayer expense, with no public recourse.

3. Reduced Public Notice Undermines Transparency and Equity

Replacing established notice requirements with website-only postings will disproportionately exclude residents who lack reliable internet access, have language barriers, or are otherwise disconnected from digital-only processes. Tree removals affect public space, neighborhood health, and climate resilience; they warrant robust, accessible notice and public participation.

Notably, many California cities—including Beverly Hills, Mountain View, Santa Cruz, Pasadena, and others—maintain clear appeal processes for tree removals. San Francisco would be moving backward by eliminating them.

4. These Amendments Conflict with Climate, Equity, and Public Health Goals

Urban trees are essential infrastructure. They reduce extreme heat, filter air pollution (including wildfire smoke), manage storm water, support biodiversity, and improve mental and physical health. Weakening planting requirements and oversight contradicts the City's Climate Action Plan, General Plan sustainability goals, and stated equity commitments—particularly as climate impacts intensify statewide.

Conclusion

File No. 251211 risks accelerating canopy loss, reducing public trust, and undermining San Francisco's climate resilience at precisely the wrong moment. I urge you to reject these amendments and instead pursue policies that:

* Preserve mandatory, on-site tree planting whenever feasible,
* Maintain the public's right to appeal City-initiated tree removals,
* Strengthen—not weaken—public notice requirements, and
* Invest in scalable City–community partnerships that expand planting and watering capacity.

San Francisco needs more trees, more accountability, and more public engagement, not fewer of each.

Respectfully submitted,

John Nulty co-chair San Francisco Tree Campaign

https://sanfranciscotreecampaign.blogspot.com
<https://url.avanan.click/v2/r01/__https://sanfranciscotreecampaign.blogspot.com___YXAzOnNmZHQyOmF6bzpiMGMyNzU4OWY4NmE4ZTUzY2E1NjMwOGJhY2YyYzc2Yjo3OjEwMjc6OTliZmUzOThlZGZkM2Y0NDhkYzRmZDlbZThhNjYxYmYxNzI2Y2QxZmEwOTY4NmQ4ZWQzYzMyOGM3NWUwMzE4NTpoOlQ6Tg>

From: Tenderloin Tree Campaign 2004
To: Board of Supervisors (BOS)
Cc: Carroll, John (BOS); Ionin, Jonas (CPC)
Subject: Opposition to File No. 251211
Date: Friday, December 19, 2025 2:00:36 PM

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Executive Summary and Analysis of Proposed Amendments Affecting San Francisco's Tree Canopy

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   Or providing alternative landscaping (a vaguely defined option that excludes street trees).
2. **Elimination of Public Appeals:** The public's right to appeal tree removals initiated by City departments and commissions to the Board of Appeals would be removed, making such removals final and non appealable.

Key Concerns and Critique

1. Impact on San Francisco's Tree Canopy

Reduction in Actual Tree Planting: Allowing developers to pay fees or provide alternative landscaping instead of planting trees will likely reduce the number of new trees planted. The current in lieu fee barely covers the full cost of planting and maintaining trees, including replacement of dead or damaged trees.
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Watering and Maintenance Challenges: Ongoing watering for about three years after planting is critical but underfunded. The $19 million annual StreetTreeSF budget is legally restricted to maintenance of existing trees, not planting or watering new ones, limiting successful establishment of new trees.

2. Elimination of Public Appeals for City-Initiated Tree Removals

Loss of Oversight and Accountability: Removing the public's right to appeal tree removals initiated by City departments eliminates an important check on City actions, reducing transparency and public input.
No Real Efficiency Gain: Appeals currently take 6-8 weeks and are not a significant bottleneck to development. Eliminating appeals does not meaningfully expedite projects but removes public scrutiny.
Risk of Corruption and Reduced Public Input: Without appeals, developers might pressure the City to remove trees on public land to avoid scrutiny, shifting costs to taxpayers and reducing transparency.

Context: Importance of Urban Trees in San Francisco

Critical Role of Urban Forests: Urban trees contribute significantly to climate resilience, public health, and social equity by reducing urban heat, improving air quality, and enhancing community well-being.
San Francisco's Tree Canopy Status: The city's tree canopy covers about 13.7% of the urban area, one of the smallest among major U.S. cities. Protections mainly cover street trees and significant trees near sidewalks; trees in parks and private yards are largely unregulated.
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Financial and Operational Realities

Aspect	Current Situation	Impact of Proposed Amendments
In Lieu Fee Amount	Approximately $2,590 per tree, barely covers planting and watering costs	Encourages fee payment over actual planting, reducing canopy growth
Tree Planting Funding	Patchwork, unreliable, mostly volunteer-driven	No new dedicated funding; watering remains a bottleneck
	Limited Public	Increased demand without

Operational Capacity	Works and FUF resources	capacity increase will hinder planting efforts
Public Oversight	Board of Appeals hears appeals on tree removals	Eliminating appeals removes public checks and balances

Answers to Your Specific Questions

What are the proposed alternatives?

Developers can satisfy street tree planting requirements by:
Planting trees,
Paying an in lieu fee,
Or providing “alternative landscaping,” a vaguely defined option that excludes street trees and does not guarantee canopy growth.

How much is the in lieu fee?

The in lieu fee is currently approximately $2,590 per tree.

What is the current tree canopy percentage?

San Francisco’s urban tree canopy is approximately 13.7%, one of the lowest among major U.S. cities.

Who is FUF?

Friends of the Urban Forest (FUF) is a nonprofit partner organization that collaborates with the City’s Public Works department to plant and maintain urban trees in San Francisco. FUF plays a critical role in volunteer-driven tree planting and maintenance efforts but faces resource constraints.

Opposition Points and Broader Concerns

The amendments prioritize development efficiency over environmental sustainability, public accountability, and the long-term health of San Francisco’s urban forest.
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fostering community trust and preventing arbitrary removals.
Given San Francisco’s budget deficits and climate challenges, weakening tree protections risks exacerbating urban heat islands, storm water runoff, biodiversity loss, and public health issues.

Potential Alternatives and Solutions (Brief Mention)

The document suggests exploring balanced policy solutions that support both expedited development and urban canopy growth.
Possible approaches include:
- Increasing the in lieu fee to reflect true planting and maintenance costs,
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The in lieu fee in San Francisco is currently set at approximately **$2,590 per tree**. This fee is designed to cover the city's estimated cost to plant and water a tree for three years. The rationale behind the fee is to allow developers to pay this amount instead of planting trees directly, with the city then responsible for planting and maintaining trees elsewhere.

However, this fee has been criticized as barely sufficient to cover the full costs involved, including planting, watering, and maintaining the trees over time. Because of this, there is concern that allowing developers to pay the fee instead of planting trees on-site may reduce the overall number of new trees planted and hinder the growth of San Francisco’s urban canopy.
The fee is part of a broader discussion about balancing development needs with environmental sustainability and urban forestry goals in the city.

Improving operational capacity for urban tree planting and maintenance in San Francisco involves addressing several key challenges related to resources, coordination, funding, and community engagement. Here are detailed strategies that could enhance the city’s ability to effectively plant and maintain its urban forest:

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2. Enhance Coordination and Project Management

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Cross-Department Collaboration: Improve coordination between Public Works, Recreation and Parks, Planning, and other relevant departments to streamline tree-related projects and avoid duplication or gaps.
Use of Technology: Implement GIS mapping, tree inventory databases, and project management software to track tree locations, health, watering schedules, and maintenance needs efficiently.

3. Improve Watering and Maintenance Capacity

Innovative Watering Solutions: Invest in irrigation infrastructure such as drip irrigation, rainwater harvesting, and smart watering systems to reduce labor and water use.
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Improving operational capacity for urban tree planting and maintenance in San Francisco involves addressing several key challenges related to resources, coordination, funding, and community engagement. Here are detailed strategies that could enhance the city's ability to effectively plant and maintain its urban forest:

How much funding is needed?

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From: San Francisco Tree Campaign
To: Board of Supervisors (BOS)
Cc: Carroll, John (BOS); Ionin, Jonas (CPC)
Subject: Opposition to File No. 251211 – Urban Forestry Amendments
Date: Friday, December 19, 2025 1:43:04 PM

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Opposition to File No. 251211 – Urban Forestry Amendments

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- Allowing developers to satisfy street tree requirements through in-lieu fees or undefined "alternative landscaping,"
- Exempting ADUs and JADUs from tree planting requirements,
- Eliminating the public's right to appeal tree removals initiated by City departments and commissions, and
- Replacing existing public notice requirements with online postings only.

Taken together, these changes prioritize administrative convenience over environmental sustainability, public accountability, and the long-term health and resilience of San Francisco.

1. In-Lieu Fees Will Reduce Tree Planting at a Time We Can Least Afford It

San Francisco's tree canopy is critically low—approximately **13–14%**, among the smallest of any major U.S. city. New development has become one of the *primary remaining mechanisms* through which new street trees are planted, largely because City planting capacity is chronically underfunded.

Allowing developers to opt out of planting trees by paying an in-lieu fee (currently ~$2,600 per tree) will result in **fewer trees planted, full stop**. The fee does not cover the true cost of planting, watering, and replacing trees over their three-year establishment period, nor does it compensate for lost planting opportunities when new frontages are designed to permanently preclude trees.

This shift is especially troubling given the City's ongoing fiscal crisis. With projected deficits approaching **$1 billion**, Public Works and its Urban Forestry Bureau already lack the operational capacity to convert in-lieu fees into timely, neighborhood-level plantings. Deferred payments do not cool streets, clean air, or support public health.

Exempting ADUs and JADUs further compounds this problem. While small individually, their cumulative impact on density, heat islands, and storm water runoff is significant—particularly in neighborhoods already lacking canopy.

2. Eliminating Appeals for City-Initiated Tree Removals Removes Oversight—Not Red Tape

The proposal to eliminate appeals to the Board of Appeals for tree removals undertaken by City departments does **not** meaningfully expedite housing or private development. City-initiated removals are overwhelmingly associated with public works and infrastructure projects, not private construction.

Appeals serve a critical function: they require departments to justify removals publicly and have repeatedly led to **better outcomes**, including:

- Preservation of healthy trees,
- Revised designs that accommodate both infrastructure and canopy,
- Increased replacement ratios, and
- Innovative community partnerships such as **Mission Verde**, which now serves as a model for volunteer-supported tree watering and green jobs.

Removing appeals eliminates one of the City's only effective oversight mechanisms for urban forestry decisions and creates a real risk of abuse—encouraging developers to pressure City agencies to initiate removals on their behalf, at taxpayer expense, with no public recourse.

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Replacing established notice requirements with website-only postings will disproportionately exclude residents who lack reliable internet access, have language barriers, or are otherwise disconnected from digital-only processes. Tree removals affect public space, neighborhood health, and climate resilience; they warrant robust, accessible notice and public participation.

Notably, many California cities—including Beverly Hills, Mountain View, Santa Cruz, Pasadena, and others—maintain clear appeal processes for tree removals. San Francisco would be moving *backward* by eliminating them.

4. These Amendments Conflict with Climate, Equity, and Public Health Goals

Urban trees are essential infrastructure. They reduce extreme heat, filter air pollution (including wildfire smoke), manage storm water, support biodiversity, and improve mental and physical health. Weakening planting requirements and oversight contradicts the City's Climate Action Plan, General Plan sustainability goals, and stated equity commitments—particularly as climate impacts intensify statewide.

Conclusion

File No. 251211 risks accelerating canopy loss, reducing public trust, and undermining San Francisco's climate resilience at precisely the wrong moment. I urge you to reject these amendments and instead pursue policies that:

- Preserve mandatory, on-site tree planting whenever feasible,
- Maintain the public's right to appeal City-initiated tree removals,
- Strengthen—not weaken—public notice requirements, and
- Invest in scalable City–community partnerships that expand planting and watering capacity.

San Francisco needs **more trees, more accountability, and more public engagement**, not fewer of each.

Respectfully submitted,

John Nulty co-chair San Francisco Tree Campaign

https://sanfranciscotreecampaign.blogspot.com

OFFICE OF THE MAYOR
SAN FRANCISCO

DANIEL LURIE
MAYOR

TO: Angela Calvillo, Clerk of the Board of Supervisors
FROM: Adam Thongsavat, Liaison to the Board of Supervisors
RE: Public Works, Administrative, Planning Codes - Street Trees
DATE: December 9, 2025

Ordinance amending the Public Works Code to allow development projects to satisfy street tree planting requirements through payment of an in lieu fee or providing alternative landscaping; exempt accessory dwelling units from street tree planting requirements; eliminate appeals to the Board of Appeals for tree removals undertaken by City departments and commissions; and update in lieu fee reporting requirements; amending the Administrative Code to create a separate account within the Adopt-A-Tree Fund to receive in lieu fees for street tree requirements; amending the Planning Code to update street tree applicability requirements; affirming the Planning Department's determination under the California Environmental Quality Act; making findings of consistency with the General Plan and the eight priority policies of Planning Code, Section 101.1; and making public necessity, convenience, and welfare findings under Planning Code, Section 302.

Should you have any questions, please contact Adam Thongsavat at adam.thongsavat@sfgov.org

1 DR. CARLTON B. GOODLETT PLACE, ROOM 200
SAN FRANCISCO, CALIFORNIA 94102-4681
TELEPHONE: (415) 554-6141

OFFICE OF THE MAYOR
SAN FRANCISCO

DANIEL LURIE
MAYOR

TO: Angela Calvillo, Clerk of the Board of Supervisors
FROM: Dexter Darmali, Legislative & Ethics Secretary
RE: Public Works, Administrative, Planning, Business and Tax Regulations Codes - Street Trees
DATE: June 30, 2026

Ordinance amending the Public Works Code to allow development projects to satisfy street tree planting requirements through payment of an in lieu fee or providing alternative landscaping; exempt accessory dwelling units from street tree planting requirements; eliminate appeals to the Board of Appeals and the Director of the Department of Public Works for hazardous tree removals undertaken by City departments and commissions; amending the Administrative Code to specify a separate account within the Adopt-A-Tree Fund to receive in lieu fees for street tree requirements; amending the Planning Code to update street tree applicability requirements; amending the Business and Tax Regulations Code to prescribe timeframes for the hearing and decision on appeals of certain street tree removals to the Board of Appeals; affirming the Planning Department's determination under the California Environmental Quality Act; making findings of consistency with the General Plan and the eight priority policies of Planning Code, Section 101.1; and making public necessity, convenience, and welfare findings under Planning Code, Section 302.

This is substitute legislation for file no. 251211

Should you have any questions, please contact Adam Thongsavat at adam.thongsavat@sfgov.org

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