

**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 \(BOS\)](#); [Carroll, John \(BOS\)](#); [BOS Legislation, \(BOS\)](#); [BOS-Operations](#)  
**Subject:** FW: BOMA Comments on File #260177 - Environment Code - Climate Action Plan  
**Date:** Tuesday, April 14, 2026 8:14:20 AM  
**Attachments:** [BOMA Comment Letter File#260177 Climate Action Plan.pdf](#)

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Hello Supervisors,

Please see attached and below communication from Maddie Campbell with the Building Owners and Managers Association of San Francisco, regarding:

**File No. 260177:** Ordinance amending the Environment Code to update the City's climate action goals and planning process, and to update City Departments' roles and responsibilities regarding the City's climate action goals; and affirming the Planning Department's determination under the California Environmental Quality Act.

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](mailto:board.of.supervisors@sfgov.org) | [www.sfbos.org](http://www.sfbos.org)

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**From:** Maddie Campbell <maddiec@boma.com>  
**Sent:** Monday, April 13, 2026 3:57 PM  
**To:** Board of Supervisors (BOS) <[board.of.supervisors@sfgov.org](mailto:board.of.supervisors@sfgov.org)>; Mandelman, Rafael (BOS) <[rafael.mandelman@sfgov.org](mailto:rafael.mandelman@sfgov.org)>; Board of Supervisors (BOS) <[board.of.supervisors@sfgov.org](mailto:board.of.supervisors@sfgov.org)>  
**Cc:** John Bryant <[jbryant@boma.com](mailto:jbryant@boma.com)>  
**Subject:** BOMA Comments on File #260177 - Environment Code - Climate Action Plan

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Good afternoon,

Please find attached comments from the Building Owners and Managers Association of San Francisco (BOMA SF) on File #260177 - Environment Code - Climate Action Plan.

Thank you!

--

Madeline (Maddie) Campbell

Manager of Government Affairs | [BOMA San Francisco](#)

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235 Montgomery Street, Suite 920

San Francisco, CA 94104



April 13, 2026

San Francisco Board of Supervisors  
1 Dr. Carlton B. Goodlett Place  
City Hall, Room 244  
San Francisco, CA 94102

**Re: File #260177, Environment Code - Climate Action Plan**

Dear President Mandelman and Members of the Board of Supervisors,

On behalf of the Building Owners and Managers Association of San Francisco (BOMA), we write to express our support but also offer our comments and concerns for File No. 260177, Environment Code - Climate Action Plan.

BOMA represents more than 72 million square feet of office space in San Francisco. Our members operate some of the most efficient buildings in the world, support building decarbonization, and have a long history of championing sustainability.

BOMA has partnered for years with the Department of the Environment (“the Department”) to craft feasible policy solutions that address the climate crisis. We previously worked with the Department on the draft 2025 Climate Action Plan (“CAP”) and submitted official feedback in a letter on June 13, 2025 (“June letter”). We wish to continue to our collaboration with the Department during the development of the final 2026 Climate Plan, and a potential Building Performance Standard.

We share the City’s commitment to reducing emissions and believe that durable, effective policy requires continued collaboration and careful consideration of implementation challenges. We remain committed to collaborating on equitable, effective policy solutions that reduce carbon emissions and offer the following comments and questions about this legislation.

### **Emission Reduction Baseline Considerations**

San Francisco’s commercial building owners and managers are committed to creating a cleaner environment and began decarbonizing their buildings before the city proposed a local Building Performance Standard (BPS). At the same time, our members have navigated extraordinary challenges, including historically low occupancy rates and reduced operational demand caused by the COVID-19 pandemic.

In the draft 2025 Climate Action Plan the Department proposed a 2022 baseline for emission reductions. In response, in our June 2025 letter we advocated using 2019 as a base year as it is the only reliable year that captures normal operating conditions. Importantly, this legislation differs from both positions and proposes using 2020 as the baseline year for emission reductions. **We respectfully wish to maintain our position that 2019 is the appropriate, fair and reasonable baseline year for emissions reductions.**

As we know, 2020 was the year the COVID-19 pandemic began – causing buildings to have drastically different operating conditions than normal, with some reducing their energy consumption due to high vacancy and others increasing their consumption to enhance ventilation and filtration efforts. It is problematic to use 2020 as a baseline year because it distorts the reality of greenhouse gas (GHG) emissions. The table below illustrates the progression of SF office occupancy through the pandemic and its aftermath:

Year	Office Vacancy	Physical Occupancy (Kastle)	Status
2019	5.7%	~100% of normal	Full operations
2020	16.7%	~25% average	Pandemic shutdown
2022	27.0%	~40%	Partial return
2024	34-37%	~45-47%	Stabilized hybrid

Analysis of the city’s benchmark database<sup>1</sup> shows that in 2020, 89% of commercial buildings had lower total emissions than in 2019, with a median 2020-to-2019 GHG ratio of 0.771. For buildings that were nearly empty in 2020, a "20% reduction from 2020" translates to roughly a 38% reduction from normal pre-pandemic operations – the baseline year is a significant and material change for our members.

A 2019 baseline is the most accurate and defensible reference point because it reflects buildings operating as designed, rather than under pandemic-related constraints or transitional conditions. Today, office occupancy has stabilized at approximately 45% of pre-pandemic levels, significantly below 2019 but well above 2020. Neither 2020 nor 2022 represents a steady-state operating condition. Using a 2020 baseline instead effectively measures performance against an anomalous year, resulting in targets that are misaligned with real-world operations.

While we do not oppose this legislation on this issue alone, we want to clearly register our concern and request that the baseline year be revisited as the Department develops the 2026 CAP and any future BPS. Establishing a fair and accurate baseline is critical to ensuring continued industry engagement and the long-term success of the City’s building decarbonization efforts.

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<sup>1</sup> Analysis of city-provided benchmark report data as accessed from data.sfgov.org, April 10, 2026 data set.

## Implementation Timeline: Phased Compliance from BPS Enactment

This legislation establishes a 20% emissions reduction target by 2030. We understand that the Department may develop a Building Performance Standard (“BPS”) to achieve this target, likely through a separate ordinance following adoption of the 2026 Climate Action Plan. Based on typical legislative and rulemaking timelines, this process could take several months to a year or more, which could place BPS enactment as late as 2028.

With the 2030 deadline approximately 3.5 years away, a BPS enacted in 2028 would leave building owners with roughly two years to comply. Major capital projects—such as HVAC system replacements, electrification upgrades, and building envelope improvements—typically require 18–36 months from design through completion for large commercial buildings. A two-year compliance window is therefore not feasible for most properties that have not already initiated planning and investment.

To ensure successful implementation, **BOMA requests establishing a phased compliance period of at least five years from the date of BPS enactment**, regardless of the underlying Chapter 9 target. We welcome the opportunity to work with the Department to develop a timeline that is both ambitious and achievable.

## Flexibility Mechanisms and Incentives

BOMA San Francisco supports the City’s goal of net zero emissions by 2040. Achieving this goal will require meaningful flexibility and a clear understanding of the practical realities facing building owners. Reducing gas use in large commercial buildings often requires replacing boilers, domestic hot water systems, and other equipment with electric alternatives. For a typical office building, a full boiler-to-heat-pump conversion can cost between \$20–\$100 per square foot, depending on system complexity and required electrical upgrades. Hotels and other high-load buildings may face even higher costs. These capital investments are substantial and are typically passed through to tenants under cost sharing lease clauses.

As currently drafted, this legislation does not include offsetting mechanisms—such as carbon credits, alternative compliance pathways, or portfolio-based flexibility—and removes the prior Section 906 market-based compliance framework. Without these tools, building owners have limited options to meet targets in a cost-effective and operationally feasible manner. Our analysis of city benchmark data indicates that a significant majority of commercial buildings are not currently on a trajectory to meet the 20% reduction target by 2030, underscoring the urgency of meaningful incentives and technical assistance.

**To support successful implementation, we urge the Department to re-incorporate multiple compliance pathways, including portfolio-based approaches, recognition of early action, and other market-based mechanisms.** Timelines should reflect long-term capital planning cycles, and enforcement should account for good-faith efforts to comply.

Aligning policy requirements with the financial and operational realities of commercial real estate will be critical to achieving emissions reductions at scale.

These considerations are particularly important for small business tenants, who are often least equipped to absorb increased costs. Because most commercial buildings operate as pass-through entities, both capital and operating expenses are ultimately borne by tenants. As San Francisco works to revitalize its downtown, climate policy should avoid placing additional financial strain on the businesses the City is seeking to attract and retain.

Finally, we encourage the Department to explore incentive-based approaches to support compliance, as outlined in our June 2025 letter. This could include identifying and leveraging local, state, and federal funding opportunities for energy retrofits, as well as developing programs that reward early action. For example, Washington State's Early Adopter Incentive Program under its Clean Buildings Performance Standard provides financial support for buildings that achieve early compliance. We welcome the opportunity to partner with the Department to explore similar models in San Francisco.

### **Clarify the "18,000 Buildings" Metric**

Sec. 902(b)(2) offers an alternative compliance path: "decarbonizing the equivalent of 18,000 buildings." This metric is:

- New: It never appeared in the draft CAP or prior stakeholder discussions
- Undefined: There is no definition of what "decarbonized" means for a building
- Potentially citywide: It could be measured at the portfolio level rather than per building

As currently written, this provision creates uncertainty regarding how compliance would be measured and implemented. **We urge the Department to clearly define this metric and its intended application prior to release of the 2026 Climate Action Plan to ensure transparency and effective stakeholder engagement.**

### **Align San Francisco BPS with Statewide Metrics**

This legislation requires the Department to produce an updated Climate Action Plan by December 31, 2026, and grants permissive authority to "adopt rules and regulations" (Sec. 905(a)(4)). The Department will develop the 2026 CAP, which may include a Building Performance Standard ("BPS") as the State of California is developing a statewide BPS through the California Energy Commission ("CEC").

As San Francisco advances a local BPS, **we urge the Department to define the "building emissions" metric and align San Francisco's BPS with the State's expected total site Energy Use Intensity ("EUI") framework to avoid conflicting compliance requirements.**

The legislation references “building emissions” without defining the measurement metric. During the stakeholder process, the Department communicated a focus on gas-only emissions. The CEC is expected to recommend a total site EUI metric in its forthcoming report. These approaches are fundamentally different: a gas-only metric incentivizes electrification but does not account for electric efficiency, while a total EUI metric captures both. Without alignment, BOMA members could face duplicative or conflicting compliance obligations under local and state BPS programs.

Building owners require regulatory certainty to make long-term capital investment decisions. Aligning San Francisco’s BPS metric with the state’s anticipated approach would reduce complexity, avoid conflicting compliance signals, and create a more consistent regulatory environment. It would also recognize the significant electric-side efficiency investments already made by building owners, including lighting retrofits, controls upgrades, and Title 24-compliant tenant improvements, as well as ongoing contributions to grid decarbonization through CleanPowerSF and the obligation to purchase 100% renewable power.

We also request clarity on the emission factors that will be used to calculate “building emissions.” The CEC’s statewide BPS is expected to use grid-average emission factors consistent with EPA Portfolio Manager methodology. If San Francisco uses a different accounting approach – for example, crediting the City’s 100% renewable electricity ordinance and treating local electric consumption as zero-emission – the resulting compliance framework could diverge significantly from the state standard even if both nominally measure “total emissions.” We urge the Department to specify the emission factor methodology as part of the 2026 CAP to provide building owners with a clear and predictable compliance framework.

We also reiterate our request from the June 2025 letter that the CAP clearly specify the data sources used to determine compliance. Based on prior discussions, we understand that data collected under the Existing Commercial Buildings Energy Performance Ordinance through ENERGY STAR Portfolio Manager will serve as the basis, and we urge the Department to confirm this in the final Plan.

We welcome the new public dashboard requirement under Sec. 905(a)(2) and urge the Department to include building-level benchmarking data and clear progress metrics that allow building owners to track their standing relative to any future BPS targets.

Finally, we encourage the Department to provide regular benchmarking feedback to building owners, clearly communicate how performance targets will be calibrated over time, and coordinate closely with state agencies to streamline reporting requirements. Transparency and alignment will help ensure that benchmarking remains a constructive, predictable tool for improving building performance.

## Conclusion

BOMA San Francisco supports the goals of this legislation and the City's broader commitment to reducing greenhouse gas emissions. As the Department advances the 2026 Climate Action Plan and considers a Building Performance Standard, we ask that the baseline year, emissions metric, implementation timeline, and compliance flexibility be clearly defined, achievable, and aligned with state efforts. We have documented areas where this legislation diverges from positions discussed during the stakeholder process – not to oppose the legislation, but to ensure that these differences are addressed through continued collaboration as the Department moves toward implementation.

We remain committed to working in partnership with the Department and City leaders to develop practical, effective solutions that balance environmental goals with economic realities. By prioritizing collaboration, transparency, and flexibility, San Francisco can continue to lead on climate while supporting a resilient and competitive commercial real estate market.

We appreciate the opportunity to provide input and look forward to continued engagement on the development of the final 2026 Climate Action Plan and any future Building Performance Standard.

Sincerely,

A handwritten signature in black ink, appearing to read "John R. Bryant". The signature is stylized and cursive, with the first name "John" being the most prominent part.

John R. Bryant  
Chief Executive Officer  
BOMA San Francisco

**From:** [Nancy Haber](#)  
**To:** [Carroll, John \(BOS\)](#)  
**Cc:** [Lurie, Daniel \(MYR\)](#)  
**Subject:** File #260177, Land Use Committee April 6  
**Date:** Friday, April 3, 2026 4:52:47 PM

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This message is from outside the City email system. Do not open links or attachments from untrusted sources.

I am writing to express my support of the updated Climate Action Plan, and to thank Mayor Lurie and President Mandelman for sponsoring the ordinance to amend Chapter 9 of the Environment Code with this update. I urge the approval of the Land Use Committee and then the full Board of the 2026 Climate Action Plan (CAP), which has been carefully put together by the Environment Department with extensive stakeholder input considered.

The 2026 update to the Climate Action Plan is our roadmap to a healthier, cleaner, and more resilient city. This Plan aligns climate goals with the latest science, lays out specific strategies assigned to specific City departments to implement, and provides targets and accountability mechanisms to move the City towards its climate goals.

But implementing Chapter 9 and the Climate Action Plan won't be possible without the ongoing work and guidance of the Environment Department and the oversight of the Commission on the Environment. The City must adequately fund the Environment in the upcoming budget cycle to maintain the necessary staff to enact the updated Plan, must keep the Commission on the Environment in the Charter, and beyond that must look ahead for sources of the much greater funding needed to meet our climate goals.

San Francisco has been a leader in meeting our climate emergency. We must continue to lead now at this crucial time and into the future.

Thank you,

Nancy Haber  
District 7 resident  
SF Climate Emergency Coalition

**From:** [Susan Green](#)  
**To:** [Carroll, John \(BOS\)](#)  
**Cc:** [Lurie, Daniel \(MYR\)](#)  
**Subject:** File #260177\_Chpt 9 amendments to Enviro Code and funding the Climate Action Plan  
**Date:** Thursday, April 2, 2026 4:29:52 PM

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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 & Transportation Committee,

I live in District 8 and I am a member of the SF Climate Emergency Coalition. I'm writing to strongly urge the Land Use & Transportation Committee to move the proposed ordinance to amend Chapter 9 of the City's Environment Code forward to the full Board of Supervisors with a positive recommendation.

The revised Climate Action Plan (CAP) and amendments to Chapter 9 represent our guide to a healthier and more resilient city with cleaner air, no fossil fuel pollution, and a better quality of life for everyone. I appreciate that Mayor Lurie and Board President Mandelman have respectively sponsored and co-sponsored this ordinance. Now more than ever, with our federal government gutting climate and environmental protections, we need to take action locally to avoid exacerbating the already dangerous climate crisis we face.

That said, the revised CAP and amended Chapter 9 will remain just a vision of what we need to do, if we don't also **fund** the work that needs to get done to meet their goals.

In addition to supporting this legislation, please advocate for (1) adequate funding from the City's General Fund for the Environment Department so their climate staff can advance the CAP and coordinate that work across City departments, (2) keeping the Environment Commission in the Charter to maintain a citywide forum in which to discuss Chapter 9 issues, engage the public, and hold City departments accountable, and (3) creating and implementing a financial plan to dramatically scale up the funding needed to reach the City's 2040 net zero emissions goal.

Thank you for your support for meeting San Francisco's climate action goals.

Susan Green  
920 Diamond St, SF 94114

**From:** [Joni Eisen](#)  
**To:** [Carroll, John \(BOS\)](#); [Lurie, Daniel \(MYR\)](#)  
**Subject:** File #260177, Land Use Committee April 6  
**Date:** Thursday, April 2, 2026 12:33:44 PM

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This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Land Use Committee and Mayor Lurie,

Thank you, Mayor Lurie, for sponsoring this legislation to incorporate the newly-updated Climate Action Plan into Chapter 9 of the City's Environment Code. It's the right thing to do.

As a longtime artist and Potrero Hill resident, as well as a concerned grandparent, I am writing in awe of the incredible leadership and hard work that SF Environment Department (SFE) has demonstrated for years. Specifically, I urge the Committee's approval of the updated Climate Action Plan (CAP).

I must add, however, that adopting such a detailed and comprehensive Plan into the Environment Code will mean nothing without the means to implement it. If, as the current budget proposes, General Fund allocations to SFE are reduced to the point that the very staff positions uniquely equipped to do the work implementing the CAP (and overseeing that work across other departments) are eliminated, what is the point of a Climate Action Plan at all?

Our City must lead, not fall behind at this crucial time. Please, Mayor Lurie and Supervisors, be the leaders we need: advocate funding climate action now and into the future. Thank you.

Sincerely,

Joni Eisen  
District 10 resident

**From:** [Margaret Chen](#)  
**To:** [Carroll, John \(BOS\)](#)  
**Subject:** Writing you about File #260177  
**Date:** Wednesday, April 1, 2026 7:00:55 PM

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Dear Mr Carroll and members of the SF Land Use & Transportation Committee,

I am a long time SF resident, retired physician and Clinical Professor, emeritus at UCSF in the Department of Obstetrics, Gynecology, and Reproductive Sciences. I am spending my retirement advocating for climate health, because the future health of my grandchildren, your children and all children hinges on changing the devastating trajectory of climate chaos.

I am writing to support of the proposed legislation to update and amend Chapter 9.  
I want to thank you and Board President Mandelman for sponsoring and co-sponsoring this ordinance.

This Chapter 9 update is the roadmap that San Francisco needs to continue moving towards a **healthier** and more resilient city with cleaner air, lower fossil fuel pollution, and a better quality of life for all its residents. With the rollback of environmental regulations across the country, now more than ever San Francisco needs to lead.

I appreciate the detailed work that the SF Environment Department has done to update the CAP as mandated, including the extensive stakeholder input solicited and considered. The 2026 update to the Climate Action Plan aligns climate goals with the latest science and lays out specific strategies assigned to specific City Departments to implement, providing targets and accountability mechanisms to move the City towards our climate goals.

But implementing Chapter 9 and the Climate Action Plan won't be possible without the ongoing work and guidance of the Environment Department and the oversight of the Commission on the Environment.

**To that end, the City must:**

1. Adequately fund the Environment Department to enact the Climate Action Plan. SFE's Climate staff only do this specific work; they are the employees who have the experience and the expertise to guide the implementation of the CAP
2. Keep the Commission in the Charter and do not eliminate it. The Commission is the only citywide forum in which to discuss Chapter 9 issues, engage the public, and hold everyone accountable.
3. Solve these funding issues for the long-term. We need to support implementation of Chapter 9 by finding the funding not only for the ongoing work of the Environment Department staff but also the strategies and solutions outlined in the Plan to meet our climate goals.

With that, I strongly urge the members of the Land Use & Transportation Committee to move this ordinance to the full board with a positive recommendation because the health of all San Franciscans, now and in the future depends on it.

Thank you,  
Margie Chen MD  
Clinical Professor, emeritus  
UCSF, Department of Obstetrics, Gynecology, and Reproductive Sciences  
Climate Health Now, Statewide Leadership Team  
Climate Health • Civic Health, Co lead

**From:** [Julie Lindow](#)  
**To:** [Carroll, John \(BOS\)](#)  
**Cc:** [Lurie, Daniel \(MYR\)](#)  
**Subject:** Comments re File #260177: Support of the proposed legislation to update and amend Chapter 9  
**Date:** Wednesday, April 1, 2026 10:06:10 AM

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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 SF Land Use & Transportation Committee,

My name is Julie Lindow, and I live in District 5. I am the Associate Director of SF Bay Physicians for Social Responsibility.

I am writing to support of the proposed legislation to update and amend Chapter 9.

I want to thank Mayor Lurie and Board President Mandelman for sponsoring and co-sponsoring this ordinance.

This Chapter 9 update is the roadmap that San Francisco needs to continue moving toward a **healthier** and more resilient city with cleaner air, lower fossil fuel pollution, and a better quality of life for all its residents. With the rollback of environmental regulations across the country, now more than ever San Francisco needs to lead.

I appreciate the detailed work that the SF Environment Department has done to update the CAP as mandated, including the extensive stakeholder input solicited and considered. The 2026 update to the Climate Action Plan aligns climate goals with the latest science and lays out specific strategies assigned to specific City Departments to implement, providing targets and accountability mechanisms to move the City towards our climate goals.

But implementing Chapter 9 and the Climate Action Plan won't be possible without the ongoing work and guidance of the Environment Department and the oversight of the Commission on the Environment.

**To that end, the City must:**

1. Adequately fund the Environment Department to enact the Climate Action Plan. SFE's Climate staff only do this specific work; they are the employees who have the experience and the expertise to guide the implementation of the CAP
2. Keep the Commission in the Charter and do not eliminate it. The Commission is the only citywide forum in which to discuss Chapter 9 issues, engage the public, and hold everyone accountable.
3. Solve these funding issues for the long-term. We need to support implementation of Chapter 9 by finding the funding not only for the ongoing work of the Environment Department staff but also the strategies and solutions outlined in the Plan to meet our climate goals.

With that, I strongly urge the members of the Land Use & Transportation Committee to move this ordinance to the full board with a positive recommendation. Thank you.

Julie Lindow

[SF Bay Physicians for Social Responsibility.org](http://SF Bay Physicians for Social Responsibility.org)

Associate Director

[JulieLindow.com](http://JulieLindow.com)

415-710-4991

**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. 260177  
**Date:** Thursday, March 19, 2026 9:49:29 AM  
**Attachments:** [2 Letters Regarding File No. 260177.pdf](#)

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Hello,

Please see attached 2 letters regarding **File No. 260177**:

Ordinance amending the Environment Code to update the City's climate action goals and planning process, and to update City Departments' roles and responsibilities regarding the City's climate action goals; and affirming the Planning Department's determination under the California Environmental Quality Act.

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](mailto:BOS@sfgov.org) | [www.sfbos.org](http://www.sfbos.org)

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**From:** [Tenderloin Tree Campaign 2004](#)  
**To:** [Board of Supervisors \(BOS\)](#)  
**Cc:** [Carroll, John \(BOS\)](#); [Ionin, Jonas \(CPC\)](#)  
**Subject:** Response to Climate Action Plan Update file 260177  
**Date:** Saturday, March 14, 2026 2:28:58 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

The San Francisco Climate Action Plan (CAP) was originally released in 2021, setting ambitious targets to reduce greenhouse gas (GHG) emissions by 61% below 1990 levels by 2030 and achieve net-zero emissions by 2040. Since then, the city has made progress, including reducing emissions by 48% from 1990 levels by 2020 and achieving 100% renewable electricity supply by 2023. An update to the plan—referred to as the 2025 CAP Update—is in the works to guide actions through 2030, building on the 2021 version with a streamlined approach, enhanced transparency, and greater emphasis on racial and social equity, funding mechanisms, governance, and innovation. The update process incorporates public feedback and equity assessments, with the final version slated for publication in April 2026 (as of March 2026, a draft is available). Key emissions targets remain consistent with the 2021 plan, but the update adds more measurable, time-bound actions (e.g., specific deadlines like "by 2026" for policies and pilots) and reports on accomplishments since 2021.

### Structural Changes

- Sectors Expanded:** The 2021 CAP covered six sectors; the 2025 draft expands to seven, renaming some for clarity and adding Water Supply (previously a 2023 addendum to the 2021 plan). Transportation and Land Use is split into separate Transportation and Housing & Land Use focuses. Responsible Production & Consumption is rebranded as Circular Economy with an emphasis on waste reduction and embodied carbon.
- Equity and Implementation Focus:** Greater integration of racial/social equity reviews, public engagement, and funding strategies (e.g., forming interdepartmental groups for climate finance). The update includes a dashboard for tracking progress and stresses co-benefits like job creation, health improvements, and resilience.
- Timeline and Process:** The 2025 draft outlines a phased rollout: action proposals in late 2024–early 2025, equity/public reviews in spring–summer 2025, revisions in summer 2025, approvals in fall 2025, and full implementation/reporting from 2026–2030.

### Sector-Specific Changes

The table below compares key goals, strategies, and actions between the 2021 CAP and the 2025 draft update, highlighting additions, refinements, or shifts. Changes emphasize post-2021 accomplishments (e.g., all-electric ordinances, EV expansions) and new near-term deadlines for 2026–2030.

Sector (2021 Name → 2025 Name)	2021 Key Goals & Strategies	2025 Draft Changes/Additions	Notable Accomplishments & New Timelines
<b>Energy Supply</b> (unchanged)	100% renewable electricity by 2025; 100% renewable energy by 2040; invest in local renewables, grid flexibility, workforce; plan gas decommissioning. Focus on affordability and equity.	Expands requirements for large buildings (>250,000 sq ft by 2026, >50,000 sq ft by 2030); adds pilots for gas decommissioning by 2026; emphasizes district steam transition by 2040 and \$1.1B grid investments by 2034.	100% renewable electricity achieved by 2023; new actions like increasing SuperGreen enrollment to 20% by 2027 and 150 MW solar/battery by 2035.
<b>Building Operations</b> → <b>Buildings</b>	Zero emissions in new buildings by 2021, large commercial by 2035, all by 2040; electrify existing buildings; workforce training; low-GWP refrigerants.	Adds building performance policies for zero GHG by 2040 (adopt by 2026); streamlines permits (e.g., heat pumps by 2026); launches campaigns and bill credits by 2025–2027; expands refrigerant replacement programs.	All-electric new construction ordinance since 2021; new expansions like All-Electric Multifamily Program and assistance for large/affordable buildings by 2027. Reduce emissions 40% from 2022 by 2035. 100 miles of transit improvements; doubled EV
	80% low-carbon trips by		

<b>Transportation &amp; Land Use → Transportation</b>	2030; 25% EVs by 2030, 100% by 2040; build reliable transit, active networks; use pricing; reduce VMT.	Strategies still in development but emphasize equity in pricing/access; fund transit and shift from cars.	ownership/chargers since 2021; Caltrain/BART electrification. New focus on sustainable aviation fuels (100M gallons at SFO by 2030).
<b>Transportation &amp; Land Use → Housing &amp; Land Use (new split)</b>	Compact infill near transit; no direct GHG targets but enables reductions.	New goals: 82,000 new homes by 2030 (≥36,000 in well-resourced areas); zoning for 36,200 units by 2026; preserve 200 units/5,000 households by 2030; transform Downtown by 2027–2030.	9,943 homes built since 2021 (2,782 affordable); streamlined permits. Adds advocacy for lower insurance and public land prioritization for affordable units (500–2,000 by 2030).
<b>Responsible Production &amp; Consumption → Circular Economy</b>	Reduce waste generation 15% and disposal 50% below 2015 by 2030; halve food waste; reduce embodied carbon 40% by 2030; sustainable procurement.	Adds circular construction (amend codes by 2028, require deconstruction by 2028); food waste compliance (90% by 2026); reuse/repair events (20 by 2027, pilot services by 2030); aviation fuels (40% intrastate by 2030).	Kitchen Zero pilot; 18 repair clinics (20 more in 2025). New roadmap for net-zero embodied carbon by 2050 and Resource Center by 2030.
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<b>Healthy Ecosystems (unchanged)</b>	Continuous sequestration for net-zero; restore lands; urban forest expansion. No direct 2030 GHG target.	30% biodiverse green space by 2030 (or committed by 2040); every resident within 10-min walk to nature by 2040; plant 30,000 trees for 155,000 total by 2040; restore 10–20 acres parks by 2030; biodiversity corridors by 2030.	Carbon sequestration study; street tree nursery. New actions like daylighting creeks by 2030 and shoreline plan by 2030.

These updates reflect evolving priorities, such as integrating water resilience more fully and adding granular deadlines to accelerate implementation by 2026–2030

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Executive Committee

Tenderloin Tree Campaign

**From:** [Michael Nulty](#)  
**To:** [Board of Supervisors \(BOS\)](#)  
**Cc:** [Carroll, John \(BOS\)](#); [Ionin, Jonas \(CPC\)](#)  
**Subject:** Public Comment Response to Climate Action Plan Update file 260177  
**Date:** Saturday, March 14, 2026 6:18:49 PM

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The Alliance for a Better District 6 appreciates the opportunity to submit comments on the 2025 Climate Action Plan Update (referenced as file 260177 in our tracking). As an organization dedicated to improving the quality of urban life in San Francisco's District 6—encompassing the downtown core, Tenderloin, South of Market, and Civic Center areas—we strongly support the City's ongoing commitment to ambitious climate goals, including the reaffirmed targets of reducing greenhouse gas emissions by 61% below 1990 levels by 2030 and achieving net-zero by 2040.

We commend the progress highlighted in the draft, such as the 48% emissions reduction by 2020 and the achievement of 100% renewable electricity supply by 2023 through efforts like CleanPowerSF. The update's streamlined approach, with more measurable, time-bound actions (e.g., specific deadlines for policies, pilots, and implementation by 2026 and beyond), enhanced transparency, and emphasis on governance, innovation, and funding mechanisms, represents a positive evolution from the 2021 plan.

District 6 faces unique urban challenges that intersect with climate action priorities. Our dense, built-out neighborhood—with high concentrations of commercial buildings, multi-unit housing, limited green space, and vulnerable populations in areas like the Tenderloin—experiences disproportionate impacts from emissions sources in the buildings (44% of citywide emissions) and transportation (45%) sectors. We particularly value the draft's continued focus on:

- Electrifying buildings and transitioning away from natural gas, including equitable decommissioning plans and incentives for upgrades (e.g., expanding programs like E-ELEC and All-Electric Multifamily).
- Promoting low-carbon transportation modes, such as walking, biking, and transit, which align well with District 6's walkable/transit-rich character but require sustained investment in safe infrastructure amid ongoing recovery from pandemic-era shifts.
- Advancing racial and social equity through targeted assessments, ensuring that benefits like cleaner air, health improvements, job creation in clean energy, and resilience reach overburdened communities in our district.

To strengthen implementation in District 6 and downtown, we recommend the following additions or clarifications in the final April 2026 publication:

1. **Prioritize downtown-specific pilots and funding:** Include dedicated timelines

and resources for accelerating building electrification and energy efficiency retrofits in commercial high-rises and older multifamily stock common in District 6. This could build on existing accomplishments while addressing post-pandemic office vacancy and return-to-office dynamics to avoid penalizing early adopters.

2. **Enhance equity integration for vulnerable populations:** Expand actions to support resilience and access in high-density, low-income areas, such as improved cooling centers, energy burden relief for residents, and community-based workforce training for clean energy jobs that prioritize local hiring in District 6.
3. **Boost innovation and governance accountability:** Strengthen monitoring and reporting mechanisms with district-level progress dashboards (building on the existing public dashboard) to ensure transparency and allow residents/businesses in District 6 to track local impacts.
4. **Secure sustainable funding:** Given the plan's new emphasis on financing, advocate for stable, dedicated revenue streams to support these actions without overburdening ratepayers or small businesses in our commercial core.

Overall, the Alliance for a Better District 6 endorses the 2025 CAP Update draft as a robust framework for continued progress. We stand ready to collaborate with the San Francisco Environment Department and other stakeholders to ensure equitable, effective implementation that makes our downtown greener, healthier, and more resilient for all who live, work, and visit here.

Thank you for considering these comments. We look forward to the final plan in April 2026 and ongoing engagement.

Sincerely,

Michael Nulty  
Executive 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  
(415) 820-1412 - Tenderloin Futures Collaborative  
<http://abd6.cfsites.org/>

**From:** [Michael Nulty](#)  
**To:** [Board of Supervisors \(BOS\)](#)  
**Cc:** [Carroll, John \(BOS\)](#); [Ionin, Jonas \(CPC\)](#)  
**Subject:** Public Comment Response to Climate Action Plan Update file 260177  
**Date:** Saturday, March 14, 2026 6:18:54 PM

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Sincerely,

Michael Nulty  
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***Michael Nulty***

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**From:** [Tenderloin Tree Campaign 2004](#)  
**To:** [Board of Supervisors \(BOS\)](#)  
**Cc:** [Carroll, John \(BOS\)](#); [Ionin, Jonas \(CPC\)](#)  
**Subject:** Response to Climate Action Plan Update file 260177  
**Date:** Saturday, March 14, 2026 2:29:10 PM

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The San Francisco Climate Action Plan (CAP) was originally released in 2021, setting ambitious targets to reduce greenhouse gas (GHG) emissions by 61% below 1990 levels by 2030 and achieve net-zero emissions by 2040. Since then, the city has made progress, including reducing emissions by 48% from 1990 levels by 2020 and achieving 100% renewable electricity supply by 2023. An update to the plan—referred to as the 2025 CAP Update—is in the works to guide actions through 2030, building on the 2021 version with a streamlined approach, enhanced transparency, and greater emphasis on racial and social equity, funding mechanisms, governance, and innovation. The update process incorporates public feedback and equity assessments, with the final version slated for publication in April 2026 (as of March 2026, a draft is available). Key emissions targets remain consistent with the 2021 plan, but the update adds more measurable, time-bound actions (e.g., specific deadlines like "by 2026" for policies and pilots) and reports on accomplishments since 2021.

### Structural Changes

- Sectors Expanded:** The 2021 CAP covered six sectors; the 2025 draft expands to seven, renaming some for clarity and adding Water Supply (previously a 2023 addendum to the 2021 plan). Transportation and Land Use is split into separate Transportation and Housing & Land Use focuses. Responsible Production & Consumption is rebranded as Circular Economy with an emphasis on waste reduction and embodied carbon.
- Equity and Implementation Focus:** Greater integration of racial/social equity reviews, public engagement, and funding strategies (e.g., forming interdepartmental groups for climate finance). The update includes a dashboard for tracking progress and stresses co-benefits like job creation, health improvements, and resilience.
- Timeline and Process:** The 2025 draft outlines a phased rollout: action proposals in late 2024–early 2025, equity/public reviews in spring–summer 2025, revisions in summer 2025, approvals in fall 2025, and full implementation/reporting from 2026–2030.

### Sector-Specific Changes

The table below compares key goals, strategies, and actions between the 2021 CAP and the 2025 draft update, highlighting additions, refinements, or shifts. Changes emphasize post-2021 accomplishments (e.g., all-electric ordinances, EV expansions) and new near-term deadlines for 2026–2030.

Sector (2021 Name → 2025 Name)	2021 Key Goals & Strategies	2025 Draft Changes/Additions	Notable Accomplishments & New Timelines
<b>Energy Supply</b> (unchanged)	100% renewable electricity by 2025; 100% renewable energy by 2040; invest in local renewables, grid flexibility, workforce; plan gas decommissioning. Focus on affordability and equity.	Expands requirements for large buildings (>250,000 sq ft by 2026, >50,000 sq ft by 2030); adds pilots for gas decommissioning by 2026; emphasizes district steam transition by 2040 and \$1.1B grid investments by 2034.	100% renewable electricity achieved by 2023; new actions like increasing SuperGreen enrollment to 20% by 2027 and 150 MW solar/battery by 2035.
<b>Building Operations</b> → <b>Buildings</b>	Zero emissions in new buildings by 2021, large commercial by 2035, all by 2040; electrify existing buildings; workforce training; low-GWP refrigerants.	Adds building performance policies for zero GHG by 2040 (adopt by 2026); streamlines permits (e.g., heat pumps by 2026); launches campaigns and bill credits by 2025–2027; expands refrigerant replacement programs.	All-electric new construction ordinance since 2021; new expansions like All-Electric Multifamily Program and assistance for large/affordable buildings by 2027. Reduce emissions 40% from 2022 by 2035. 100 miles of transit improvements; doubled EV
	80% low-carbon trips by		

<b>Transportation &amp; Land Use → Transportation</b>	2030; 25% EVs by 2030, 100% by 2040; build reliable transit, active networks; use pricing; reduce VMT.	Strategies still in development but emphasize equity in pricing/access; fund transit and shift from cars.	ownership/chargers since 2021; Caltrain/BART electrification. New focus on sustainable aviation fuels (100M gallons at SFO by 2030).
<b>Transportation &amp; Land Use → Housing &amp; Land Use (new split)</b>	Compact infill near transit; no direct GHG targets but enables reductions.	New goals: 82,000 new homes by 2030 (≥36,000 in well-resourced areas); zoning for 36,200 units by 2026; preserve 200 units/5,000 households by 2030; transform Downtown by 2027–2030.	9,943 homes built since 2021 (2,782 affordable); streamlined permits. Adds advocacy for lower insurance and public land prioritization for affordable units (500–2,000 by 2030).
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Executive Committee

Tenderloin Tree Campaign

**From:** [Shaun Aukland](#)  
**To:** [Carroll, John \(BOS\)](#)  
**Cc:** [Melgar, Myrna \(BOS\)](#); [Chen, Chyanne \(BOS\)](#); [Mahmood, Bilal \(BOS\)](#); [Lurie, Daniel \(MYR\)](#)  
**Subject:** File 260177 (Climate Action Plan) - Close the Equity Loophole with an Amendment  
**Date:** Friday, March 6, 2026 9:07:10 AM  
**Attachments:** [image.png](#)  
[Planning and DPW Response to AG Bonta and Assemblymember Haney.pdf](#)  
[Follow Up with DPW Director Carla Short.pdf](#)  
[Bernal Cut Project.pdf](#)  
[Visitacion Valley Engage Green.pdf](#)  
[South Beach Rincon Mission Bay Letter.pdf](#)  
[Acterra Support.pdf](#)  
[SOMCAN Urgent Concerns.pdf](#)  
[University of California System - Urgent Need To Address Disparity.pdf](#)  
[Hayes Valley Letter.pdf](#)

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Dear Land Use Committee and Mayor Lurie,

As a South of Market resident and founder of [FairTrees.org](#), I am writing to request an urgent amendment to [File 260177](#) regarding the updated Climate Action Plan.

Currently, Section 904(a)(2) on Page 11 mandates that the plan incorporate "an equity framework." This vague language is a dangerous loophole that must be amended to explicitly require compliance with "the San Francisco [Environmental Justice Framework](#)" adopted in the General Plan, or a combination of the Environmental Justice Framework and existing canopy data.

Leaving this language ambiguous gives implementing departments the legal cover to treat environmental justice as an unenforceable suggestion. We have documented proof that this is exactly how the Department of Public Works currently operates:

**1. Open Refusal to be Bound by the EJ Framework:** In a February 5, 2026 response to an inquiry from Attorney General Rob Bonta and Assemblymember Matt Haney, the Planning Department and Public Works explicitly argued that the state "*does not require environmental justice policies to be regulatory or independently enforceable*". They view the existing framework as a non-binding guide, which is exactly why this new ordinance must legally compel them to follow it. See attached for this letter.

**2. Subjective Criteria Used to Withhold Infrastructure:** Supervisor Matt Dorsey recently issued a formal Letter of Inquiry exposing how Public Works uses subjective criteria and strict spatial rules to withhold green infrastructure from marginalized

communities. Rather than adopting a tiered equity model that budgets for necessary infrastructure changes, such as sidewalk cuts, the department uses these hurdles as an excuse to deny plantings. This administrative neglect has resulted in over 500 empty tree wells in SOMA alone. In [this document](#), they state "The Bureau of Urban Forestry estimates approximately 500 vacant tree planting sites in Eastern, Western and Central SoMa."

**3. Ignored Community Engagement:** In September 2025, FairTrees.org met with Public Works Director Carla Short and BUF Superintendent David Moore. During that meeting, Director Short acknowledged that the department currently lacks an operational equity framework. Despite her verbal commitment to collaborate with us on developing a tiered, data-driven prioritization tool modeled after the [Los Angeles Urban Forest Equity Collective](#), our subsequent follow-up communications were completely ignored (attached).

The results of this unchecked bureaucratic avoidance are stark. While the citywide canopy average sits at 12.8%, this extreme inequity is mirrored across the Environmental Justice communities, many of which are represented by this very committee:

- **The Tenderloin:** 2.6%
- **South of Market:** 2.7%
- **Bayview Hunters Point:** 4.2%
- **Outer Mission:** 5.5%
- **Excelsior:** 6.2%
- **Oceanview/Merced/Ingleside:** 6.7%
- **Japantown:** 7.6%

If this committee passes File 260177 without explicitly binding city departments to the San Francisco Environmental Justice Framework, you will codify the very loophole that allows Public Works to continually neglect our most vulnerable neighborhoods.

I urge you to amend Page 11 to explicitly name the San Francisco Environmental Justice Framework and to amend Page 13 to require implementing departments to use operationalized, tiered equity metrics for all infrastructure deployments.

Thank you for your time and your commitment to true environmental justice.

Sincerely,

Shaun Aukland  
FairTrees.org  
Resident of SOMA Environmental Justice Community

attached:

1. Planning Department & Public Works Response to Attorney General Rob Bonta and Assemblymember Matt Haney, disclaiming responsibility for following the EJ Framework
2. Email with Public Works regarding lack of an existing equity framework
3. Letters of Support from Neighborhoods and Organizations



Acterra: Action for a Healthy Planet  
3921 East Bayshore Rd. #210  
Palo Alto, CA 94303

September 30, 2025

Honorable Mayor Lurie,

I am writing to you from the nonprofit [Acterra: Action for a Healthy Planet](#). Our organization has a 55-year history supporting Bay Area communities and carrying out our mission: Bringing people together to create local solutions for a healthy planet. Resourcing, educating, and empowering communities to confront the urgent climate crisis is our central focus. We accomplish our work via our strong connections with residents, local governments, small businesses, community organizations, and educational institutions.

[HomeGrown Bay Area](#) is an Acterra initiative which focuses on increasing access to locally grown food through the model of [community-led urban food forests](#). Acterra's community food forest projects are being planned to offer critical benefits in urban areas that lack existing green space, and where communities are already disproportionately suffering environmental harm. Specifically, food forests:

- Follow permaculture principles and use a diverse array of densely planted, longer-lived species to mimic the complexity of natural systems;
- Benefit human health by encouraging time spent outdoors in physical activity, providing a source of nutrition, reducing air pollution, helping to contain flooding, mitigating the "urban heat island" effect, building strong community fabric, and supporting mental health through exposure to greenery.
- Represent an innovative tool for cities to promote public health gains, particularly as climate-fueled risks and damages are ever on the rise.

It is extremely important to try to fix the inequitable distribution of urban tree canopy to promote more equitable health outcomes. Acterra is proud to join a broader coalition that includes the UC Center for Climate, Health, and Equity and the Coalition for San Francisco Neighborhoods in calling for a San Francisco Tree Equity Ordinance to prioritize investments in under-resourced neighborhoods. This ordinance is a vital step toward greater climate resilience and a higher quality of life for all.

Thank you for your consideration and your dedication to furthering the wellbeing of residents in San Francisco.

Sincerely,

Lauren Weston  
Executive Director  
Acterra: Action for a Healthy Planet

Cc:  
Staci Slaughter, [Staci.Slaughter@sfgov.org](mailto:Staci.Slaughter@sfgov.org)  
Alicia John-Baptiste, [A.John-Baptiste@sfgov.org](mailto:A.John-Baptiste@sfgov.org)  
Carla Short, [Carla.Short@sfdpw.org](mailto:Carla.Short@sfdpw.org)  
David Moore, [David.Moore@sfdpw.org](mailto:David.Moore@sfdpw.org)

# Subject: Repeal of Public Works Order 187246



**Carol Hansen** <cookooducky@gmail.com>  
to daniel.lurie, staci.slaughter, a.john-baptiste ▾

Thu, Oct 9, 8:15 PM (8 days ago)

Greetings, Mayor Lurie,

We're writing today to voice our concern about the 2018 Public Works order 187246, which says if a street tree is removed, it can't be re-planted if the sidewalk is less than 7.5 feet wide. This would cover a very large portion of the smaller streets in our Glen Park neighborhood.

We are stewards on the Bernal Cut Project. We need to plant more, not fewer street trees. We ought to choose Calif Native shrubs and trees that can be grown in smaller spaces.

We're in a climate catastrophe. The last thing we should be doing is filling in empty tree wells with concrete.

We must expand habitat in all our open spaces, which includes tree wells. ADA compliance and street trees-shrubs can work hand-in-hand if the right plants are chosen.

Though Glen Park is not designated an Environmental Justice Community, it does have a large number of narrow sidewalks.

Please, please make it easier for the community to expand habitat in our San Francisco concrete jungle.

It's essential to see the beauty of nature where we navigate every day.

Street trees/shrubs are a vital link to the natural world. We need to choose the right ones in the right place. ADA compliance and habitat expansion are goals that can be accomplished together.

Best Regards,

-Carol Hansen and Paul Muldown  
Stewards, Bernal Cut Project

[www.bernalcut.org](http://www.bernalcut.org)



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## Follow-up: DPW Sidewalk Pilot & Equity Plan Meeting

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Shaun Aukland <shaun.aukland@gmail.com>

Tue, Sep 9, 2025 at 4:28 PM

To: "Short, Carla (DPW)" <Carla.Short@sfdpw.org>

Cc: "Swae, Jon (DPW)" <jon.swae@sfdpw.org>, "Moore, David (DPW)" <david.moore@sfdpw.org>, "alex@swcbd.org" <alex@swcbd.org>, "Buck, Chris (DPW)" <Chris.Buck@sfdpw.org>, "Lozano, Jesus (ENV)" <jesus.lozano@sfgov.org>, "ian.schneider@sfdpw.org" <ian.schneider@sfdpw.org>, Leah Edwards <leah.e.edwards@gmail.com>, Stuart Collins <collins.stu@gmail.com>, "Dahl, Bryan (BOS)" <bryan.dahl@sfgov.org>, reese.isbell@gmail.com

Dear Carla, David, and the Public Works Team,

Thank you again for your time and for the candid discussion last week. Carla, I agree with your observation that we may have entered the meeting with different expectations, and I am grateful for your commitment to begin working together on an equity plan for San Francisco's urban forest. We are very much looking forward to our next meeting and collaborating on this critical work.

As a productive next step, I wanted to share the specific examples of successful urban forest equity frameworks I mentioned. Seeing how other California cities have codified this work can provide a valuable foundation for our own efforts.

- **Los Angeles – Urban Forest Equity Collective:** This is a powerful model for its collaborative process. It successfully brought together city departments (LADWP, Public Works), community organizations, and academic partners from the UC system who provided essential GIS and data analysis. Their public-facing, data-driven prioritization tool is a benchmark for transparency and community engagement.
  - Some resources from it: [Website](#) | [Final Report](#) | [Public Census Tract Selection](#) (which became Public Works planting strategy | [Design Guidebook](#) (this is the paper copy I gave Carla)
- **Oakland – Prioritizing EJ Communities EJ-7.15:** Oakland's plan explicitly says "Prioritize tree canopy in EJ Communities with the least amount of canopy, making it a guiding principle for all urban forestry operations and partnerships."
  - Resources: [Website](#) | [Specific 7 pages from their plan](#)
- **Sacramento County – EJ-23-25:** "The County will achieve equitable tree canopy in EJ Communities. "Increase tree canopy coverage to at least 35 percent in all unincorporated County neighborhoods by 2040, especially those that are in Environmental Justice Communities.... Continue to support Sacramento's Tree Foundation's NeighborWoods program in order to help achieve 35% tree canopy coverage in Sacramento County Neighborhoods."
  - Resources: [screenshot](#), [full PDF page 51](#)

Reflecting on our conversation, I believe it would be helpful to clarify a key concept that may have caused a disconnect. We heard the policy goal of "planting every available space" mentioned several times. While we support maximizing our city's canopy, this approach highlights the crucial distinction between equality (providing the same to all) and equity (adjusting for imbalances).

The framework used by the Los Angeles Urban Forest Equity Collective is particularly useful here. It defines urban forest equity ([screenshot](#)) using three core principles:

- **Distributional Equity:** The fair distribution of trees and their benefits, targeted specifically to marginalized or disinvested communities.
- **Recognitional Equity:** The meaningful involvement of these communities, recognizing historical context in all planning and stewardship.
- **Procedural Equity:** Ensuring underserved communities have access to information and decision-making processes, with full transparency.

This framework makes it clear that when we begin with a landscape as inequitably distributed as ours -- where a neighborhood like SOMA has a 2.7% canopy compared to the citywide average of 12.8% -- an equal planting strategy unintentionally perpetuates that same inequity. True environmental justice, as defined by this model and in state grant-making, requires allocating resources disproportionately based on measured need.

This is precisely why the Los Angeles model is so compelling. By segmenting plantable spaces into Tiers (Tier 1: readily plantable, Tier 2: requires sidewalk cuts, Tier 3: requires infrastructure changes), it provides a clear, operational framework for investing the necessary resources in the communities that need them most, even when they may be more difficult and costly places to plant.

We are excited to build on the progress from our first meeting and develop a plan for San Francisco that is both ambitious and actionable. We look forward to scheduling our next discussion.

Best regards,

Shaun Aukland

On Wed, Aug 27, 2025 at 8:26 AM Short, Carla (DPW) <[Carla.Short@sfdpw.org](mailto:Carla.Short@sfdpw.org)> wrote:

Hello Shaun and Alex,

I will add you to our visitor log to check-in a security and then will badge you up to the 16<sup>th</sup> floor.

Thank you,

Myisha



September 3, 2025

Honorable Daniel Lurie, Mayor  
Honorable Bilal Mahmood, District 5 Supervisor  
**CITY AND COUNTY OF SAN FRANCISCO**  
1 Dr. Carlton B. Goodlet Place  
San Francisco, CA 94102

Dear Mayor Lurie and Supervisor Mahmood,

On behalf of the Hayes Valley Neighborhood Association (HVNA), we are writing to express our urgent concern regarding a city policy that is actively undermining our community's green spaces and long-standing efforts to beautify our neighborhood.

The Hayes Valley neighborhood has long been a leader in advocating for innovative urban greening, including the celebrated "[living alleys](#)" program that transformed our streets into vibrant public spaces. It is with great dismay that we have learned that a current city policy, Public Works Order 187246, is now working directly against these efforts.

This policy establishes a rule of non-replacement for trees on many of our historic, narrow sidewalks. As trees reach the end of their lives, they cannot be replaced, guaranteeing a net loss of our tree canopy. This is especially concerning given that Hayes Valley already has a below-average canopy of only 9.0%. Our analysis indicates that this single policy will result in the elimination of 10% of our neighborhood's trees over time.

This policy of managed decline is in direct conflict with the city's own goals, as outlined in the Urban Forest Plan and the legally binding Environmental Justice Framework. The benefits of a healthy tree canopy are essential to the quality of life for our residents, providing shade, cleaning our air, and enhancing the unique character of Hayes Valley.

To reverse this decline and align city policy with the needs of our community, we urge your offices to take the following immediate actions:

1. **Repeal or amend Public Works Order 187246** to eliminate the policy of non-replacement and commit to a 1-for-1 replacement standard for all neighborhood street trees.
2. **Fulfill the General Plan's Mandate** by developing and funding a proactive, data-driven plan to close the canopy gap in Hayes Valley, with transparent, neighborhood-specific targets for planting new trees and filling every empty tree well.

We have been learning about these city-wide impacts from SoMa resident Shaun Aukland, author of the "Concrete over Canopy" report, and would welcome a joint meeting to partner with your office on a path forward. Our community is ready to help.

Please feel free to reach out to me for further discussion.

Sincerely,

The Board of the Hayes Valley Neighborhood Association

A handwritten signature in black ink, appearing to read 'David Robinson', with a stylized flourish at the end.

David Robinson  
President  
[President@hayesvalleysf.org](mailto:President@hayesvalleysf.org)

400 Grove Street, Suite # 3  
San Francisco, CA 94102



49 South Van Ness Ave. Suite 1600  
San Francisco, CA 94103  
628.271.3160  
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49 South Van Ness Ave. Suite 1400  
San Francisco, CA 94103  
628.652.7600  
www.sfplanning.org

February 5, 2026

Rob Bonta, Attorney General of California  
1300 I Street  
Sacramento, CA 95814

Assemblymember Matt Haney  
District Office, 455 Golden Gate Avenue  
San Francisco, CA 94102

Subject: Inquiry into City and County of San Francisco's compliance with Senate Bill 1000 (SB 1000) and related environmental justice protections.

Dear Attorney General Bonta and Assemblymember Haney,

The City and County of San Francisco respectfully submits this response to Assemblymember Matt Haney's December 16, 2025, letter requesting that the Bureau of Environmental Justice investigate the City and County of San Francisco's compliance with Senate Bill 1000 (SB 1000) and related environmental justice protections.

This memorandum is intended to directly address the assertions and questions raised in the Assemblymember's correspondence.

### **1. Does San Francisco's Environmental Justice Framework comply with SB 1000?**

Yes. San Francisco's Environmental Justice Framework ("EJ Framework") meets the statutory requirements of SB 1000 and Government Code section 65302(h).

The San Francisco Board of Supervisors adopted the EJ Framework on May 9, 2023, and then Mayor London Breed signed the ordinance on May 19, 2023. As a result, the EJ Framework is incorporated by reference into the General Plan Introduction and constitutes a state-mandated environmental justice component of the General Plan.

SB 1000 explicitly allows jurisdictions to satisfy its requirements either through a standalone environmental justice element or through environmental justice goals, policies, and objectives integrated into other General Plan elements. San Francisco's approach reflects this flexibility and ensures that environmental justice considerations are embedded throughout citywide planning rather than siloed in a single General Plan element.

The EJ Framework represents over two and a half years of work and extensive collaboration among City agencies, including the San Francisco Department of Public Health, the San

Francisco Department of the Environment, the San Francisco Public Utilities Commission and community stakeholders. It includes an Environmental Justice Communities Map informed by state and local data and establishes citywide vision and priority statements across six policy areas adapted directly from SB 1000:

- Healthy and Resilient Environments
- Physical Activity and Healthy Public Facilities
- Healthy Food Access
- Safe, Healthy, and Affordable Homes
- Equitable and Green Jobs
- Empowered Neighborhoods

Compliance with SB 1000 has been reported to the State Office of Planning and Research through San Francisco's Annual Progress Reports beginning with the 2024 APR (covering calendar year 2023) and referenced in earlier reports during framework development.

## **2. Is the Environmental Justice Framework a non-binding or ineffective policy document?**

No. The characterization of the EJ Framework as “non-binding” in a manner that undermines SB 1000 is inaccurate.

As a General Plan policy framework adopted by the Board of Supervisors' ordinance, the EJ Framework serves as a guiding policy for City decision-making and prioritization across departments. SB 1000 does not require environmental justice policies to be regulatory or independently enforceable, nor does it mandate that jurisdictions abandon service delivery in non-environmental justice areas.

Rather, SB 1000 requires jurisdictions to identify objectives and policies to reduce compounded health risks in disadvantaged communities, promote civic engagement, and prioritize improvements and programs addressing the needs of those communities. San Francisco's EJ Framework satisfies these requirements and represents the City's first citywide policy focused on advancing environmental justice across all City agencies.

## **3. Are street trees or green infrastructure being withheld from Environmental Justice Communities based on subjective criteria such as “survivability” or vandalism?**

No. San Francisco Public Works' Bureau of Urban Forestry (BUF) does not withhold street trees from Environmental Justice Communities based on subjective or arbitrary criteria.

Tree planting feasibility is evaluated using objective, site-specific factors that apply citywide, including but not limited to Americans with Disabilities Act (ADA) compliance, proximity to

underground utilities, overhead obstructions, or surrounding infrastructure, available soil volume, and other environmental factors. These considerations are essential to ensuring public safety, accessibility, long-term tree survival, and responsible use of public funds.

Successful tree planting campaigns require not only viable site conditions, but also sufficient funding for establishment and maintenance, as well as meaningful community engagement and community buy-in. These best practices are consistent with peer-reviewed scientific research and guidance from the U.S. Forest Service, including recommendations outlined in “Beyond the Golden Shovel: Recommendations for a Successful Urban Tree Planting Initiative.”

BUF directly plants trees and supports partner-led planting efforts in disadvantaged communities throughout San Francisco, including within Assembly District 17.

#### **4. Is equity-focused funding being diverted away from Environmental Justice Communities or District 17?**

No. In fact, San Francisco Public Works has secured substantial equity-focused funding for projects located within District 17 as it contains many of San Francisco’s highest-rated equity priority communities. While San Francisco adopted the EJ Community Map in 2023 (see attachment titled “Environmental Justice Communities Map,” equity priorities may also be defined by grant funders according to their specific equity measurement mapping tools (examples: CalEnviroscreen 4.0 used for California State grants, Climate and Economic Justice Screening Tool used for Federal grants). By nature of the grant application and scoping process, equity-focused grant project areas typically align with the equity measuring tool preferred by the funding agency.

For the period between 2022 and 2029, approximately **\$18.5 million** has been secured in urban forestry-related grants, which largely fall in District 17—more than any other area of San Francisco (See attachment titled “Urban Forestry Grant Funding in District 17 (2022-2029)”). These funds include:

- **U.S. Forest Service Inflation Reduction Act Grant:** \$12,000,000
- **California Natural Resources Agency Grant:** \$456,000
- **SFCTA Proposition L Grant:** \$1,100,000
- **CAL FIRE Workforce Development Grant:** \$1,193,594
- **Caltrans Clean California Grant:** \$3,825,000

**Example:** On June 1, 2023, San Francisco Public Works applied for, and was subsequently awarded, a \$12 million Inflation Reduction Act grant from the U.S. Forest Service to support the planting and establishment of approximately 3,500 street trees in disadvantaged communities. Per federal grant guidelines, the City used the Federal Climate & Economic Justice Screening Tool (CEJST) 1.0 to define project boundaries, consistent with the Justice40 Initiative, and

further prioritized neighborhoods using a Heat Vulnerability Index developed by the San Francisco Department of Public Health (see attachment titled “Heat and Air Quality Resilience Mapping 2023”).

While the Planning Department’s EJ Communities Map and the federal CEJST boundaries do not perfectly align, the IRA grant project area remains fixed per the executed grant agreement, even after subsequent changes to federal equity tools.

**5. Are residents in disadvantaged communities required to pay out-of-pocket for street trees due to City inaction?**

No. This assertion is not accurate.

The City continues to provide publicly funded street tree planting in eligible locations, particularly in disadvantaged communities, and actively seeks grant funding to expand these efforts. While residents may voluntarily sponsor or request trees outside of publicly funded programs, this does not reflect a failure by the City to provide environmental health protections or a redirection of equity funds away from Environmental Justice Communities.

**6. Are Environmental Justice Communities being treated as “containment zones” for environmental and social burdens?**

No. The suggestion that Environmental Justice Communities are treated as “containment zones” is not supported by City policy or investment patterns.

San Francisco’s Environmental Justice Framework, General Plan policies, and capital investments are explicitly designed and laser focused to reduce cumulative health burdens, address historic inequities, and prioritize improvements and programs in communities facing disproportionate environmental health challenges.

**Conclusion**

San Francisco remains fully committed to compliance with SB 1000 and to advancing environmental justice through coordinated planning, investment, and community engagement. The City has adopted a legally compliant Environmental Justice Framework, secured significant equity-focused funding for disadvantaged communities, and continues to refine implementation practices using data-driven tools and interagency collaboration.

We respectfully submit this response to clarify the factual record and welcome any further dialogue with the Bureau of Environmental Justice.

Sincerely,



Carla Short  
Director, San Francisco Public Works  
[carla.short@sfdpw.org](mailto:carla.short@sfdpw.org)



Sarah Dennis Phillips  
Director, San Francisco Planning Department  
[sarah.dennis-phillips@sfgov.org](mailto:sarah.dennis-phillips@sfgov.org)

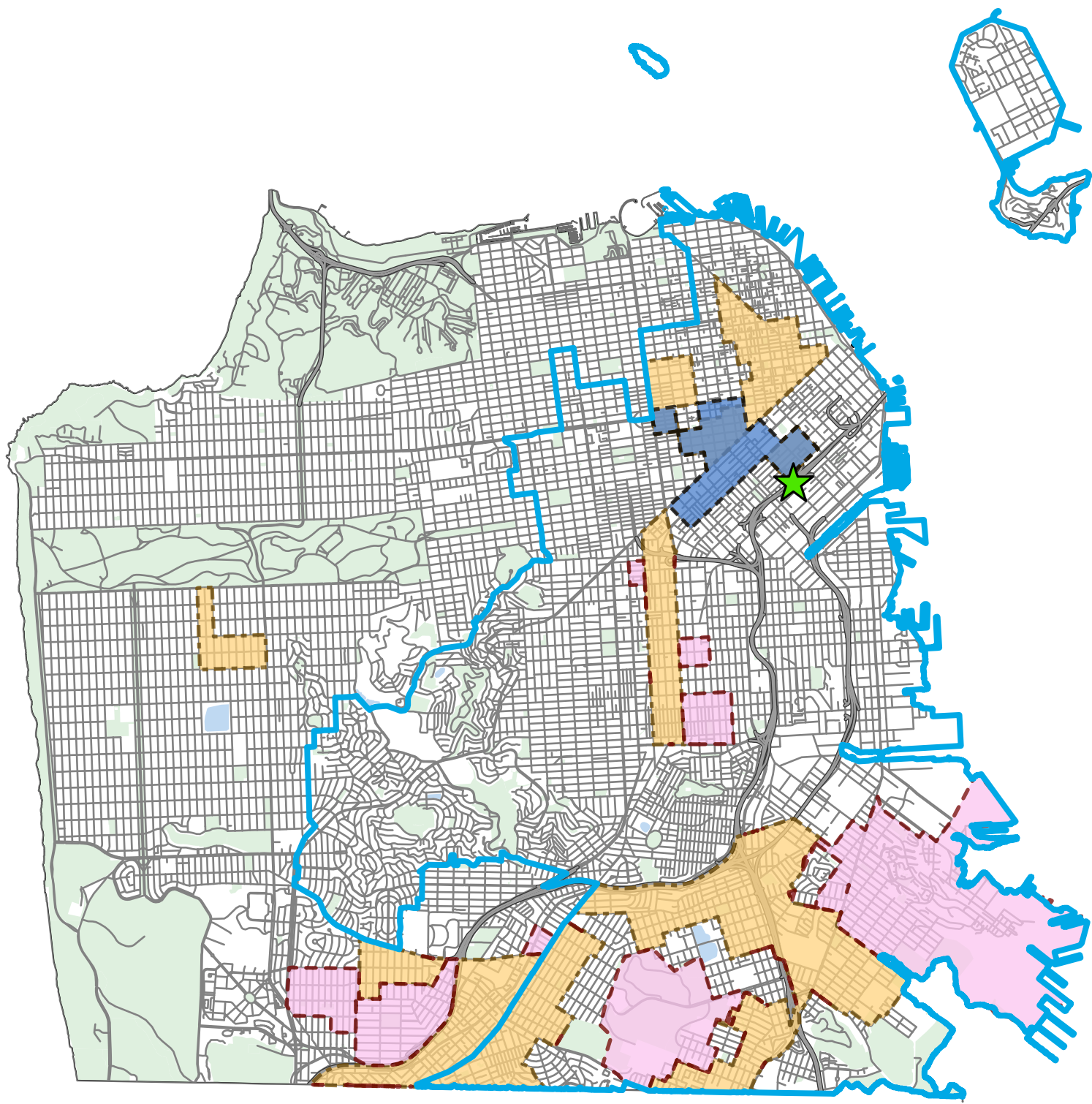
CC:






Mayor Daniel Lurie  
Supervisor Matt Dorsey  
City Attorney David Chiu

Attachments:

Urban Forestry Grant Funding in District 17 (2022-2029) Map  
Environmental Justice Communities Map  
Heat and Air Quality Resilience Mapping 2023

# Urban Forestry Grant Funding in District 17 (2022-2029)

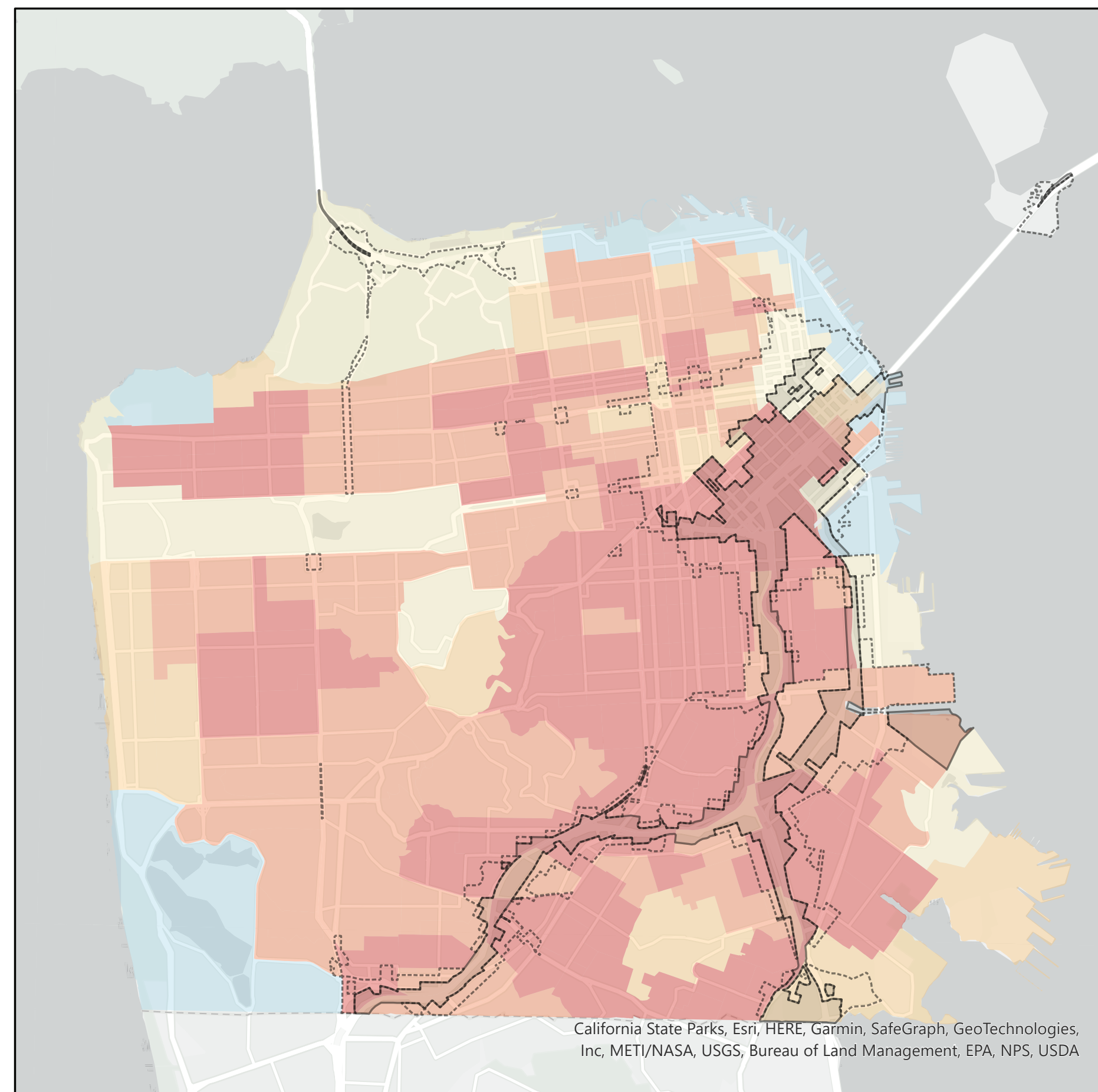


-  CA Assembly District 17
-  US Forest Service Inflation Reduction Act (IRA) Grant: \$12,000,000
-  California Natural Resources Agency (CNRA) Grant: \$456,000
-  San Francisco County Transportation Authority (SFCTA) Proposition L Grant: \$1,100,000
-  Street Tree Nursery:
  - CAL FIRE Urban & Community Forestry Grant: \$1,193,594
  - Caltrans Clean California Grant: \$3,825,000

# Heat and Air Quality Resilience Mapping 2023

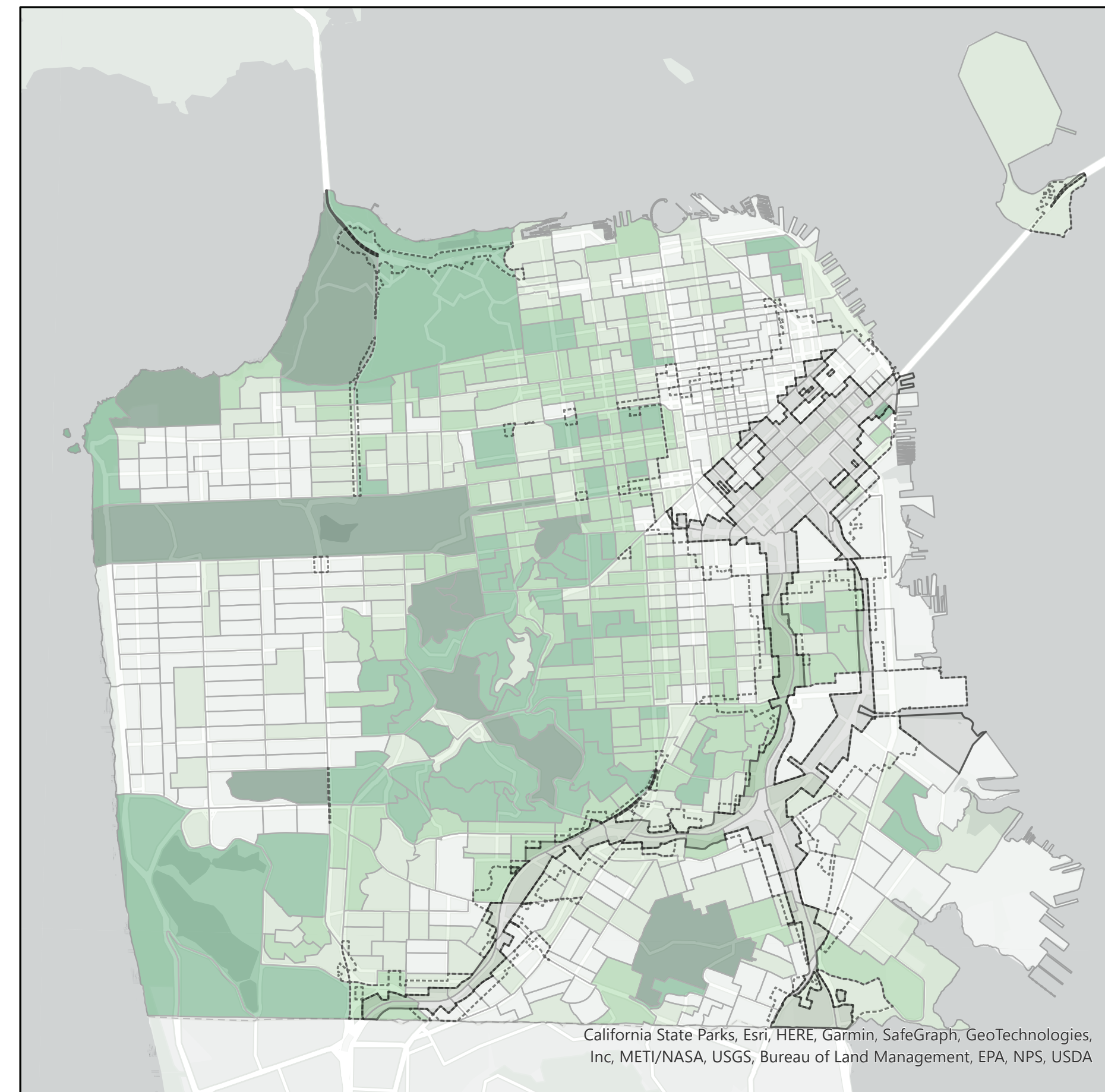
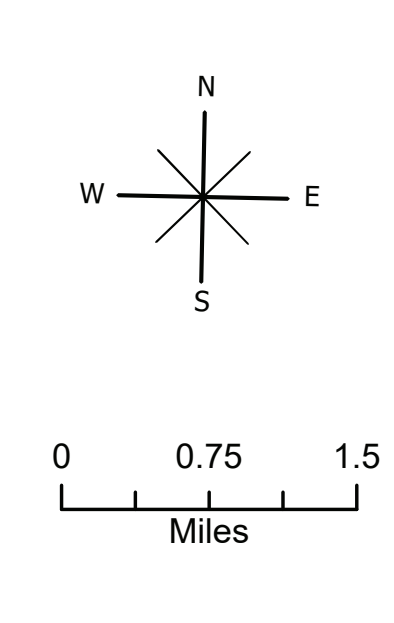
# Heat and Air Quality Resilience Mapping

## Citywide Exposure



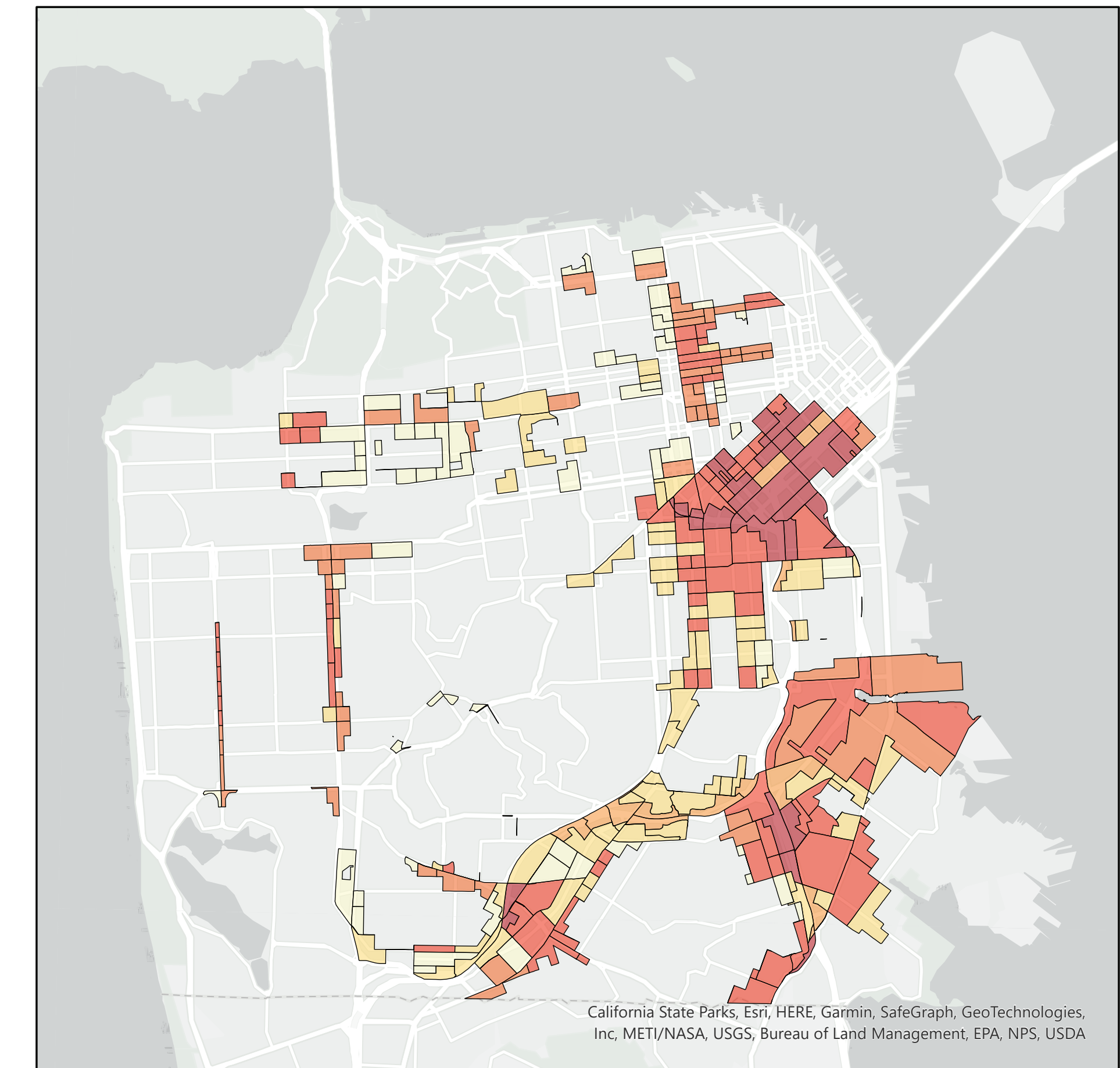
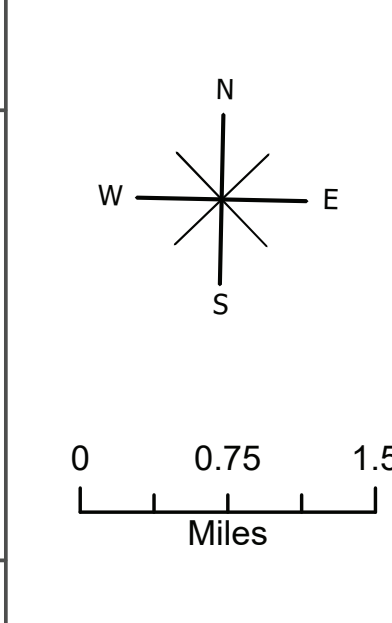
California State Parks, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, USDA

Heat and Pollution Exposure	
<p><b>September 2nd, 2017 Heat Dome Temperatures</b></p> <ul style="list-style-type: none"> <li>97 - 100</li> <li>101 - 107</li> <li>108 - 111</li> <li>112 - 114</li> <li>115 - 119</li> </ul>	<p><b>Average Surface Temperature in Degrees Fahrenheit</b></p>
<p><b>Mean Total Amount of Particulate Matter Under 2.5 PPM</b></p> <ul style="list-style-type: none"> <li>Medium Pollution (9.8-11.3 Average PM)</li> <li>High Pollution (11.4-19 Average PM)</li> </ul>	<p><b>Air Quality</b></p>
Credits : NASA ASTER and San Francisco Department of Public Health	
2023	



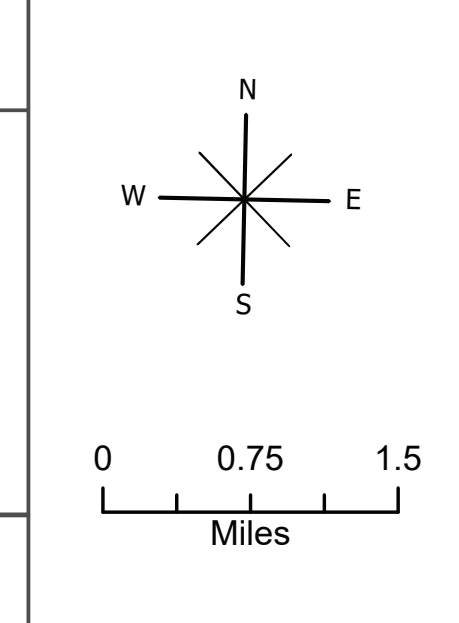
California State Parks, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, USDA

Pollution and Tree Canopy Coverage	
<p><b>Air Quality</b></p> <ul style="list-style-type: none"> <li>Medium Pollution (9.8-11.3 Average PM)</li> <li>High Pollution (11.4-19 Average PM)</li> </ul>	
<p><b>Percentage Tree Canopy Coverage</b></p> <ul style="list-style-type: none"> <li>0-5%</li> <li>6-10%</li> <li>11%-16%</li> <li>16%-31%</li> <li>32%-60%</li> </ul>	
Credits : San Francisco Department of Urban Forestry and San Francisco Department of Public Health	
2023	



California State Parks, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, USDA

Heat and Pollution Exposure with Tree Canopy Coverage	
<ul style="list-style-type: none"> <li>5-10% Tree Canopy Coverage with Some Exposure</li> <li>5-10% Tree Canopy Coverage with More Exposure</li> <li>5-10% Tree Canopy Coverage with Most Exposure</li> <li>0-5% Tree Canopy Coverage with Some Exposure</li> <li>0-5% Tree Canopy Coverage with More Exposure</li> <li>0-5% Tree Canopy Coverage with Most Exposure</li> </ul>	<p><b>Exposure to Pollution with a Particle Size Below 2.5PPM</b></p> <p><b>Temperature Data From September 2nd, 2017 Heat Dome</b></p>
Credits : NASA ASTER, San Francisco Department of Public Health	
2023	



The first map in this series identifies where in the city heat waves are most pronounced and where air pollution is most pronounced.

The air pollution we are measuring is Particulate Matter Under 2.5 Parts Per Million, also known as fine particulates. This kind of particulate matter is created by vehicle exhaust, burning of gas or other fuel, and fires. Breathing in an unhealthy concentration of fine particulates can increase the risk for health problems like asthma and heart disease.

Heat waves can lead to heat stroke in vulnerable populations, including the elderly and can exacerbate existing health conditions like cardiovascular diseases, respiratory disorders, kidney diseases, and diabetes (CDC).

The second map in this series visualizes tree canopy coverage in comparison to the highest concentrations of Fine Particulate Matter.

One way to combat Fine Particulate Matter is with plants, they can disperse pollution and catch particulates before they get to humans. Tree canopy coverage is a measure of the density of our urban canopy.

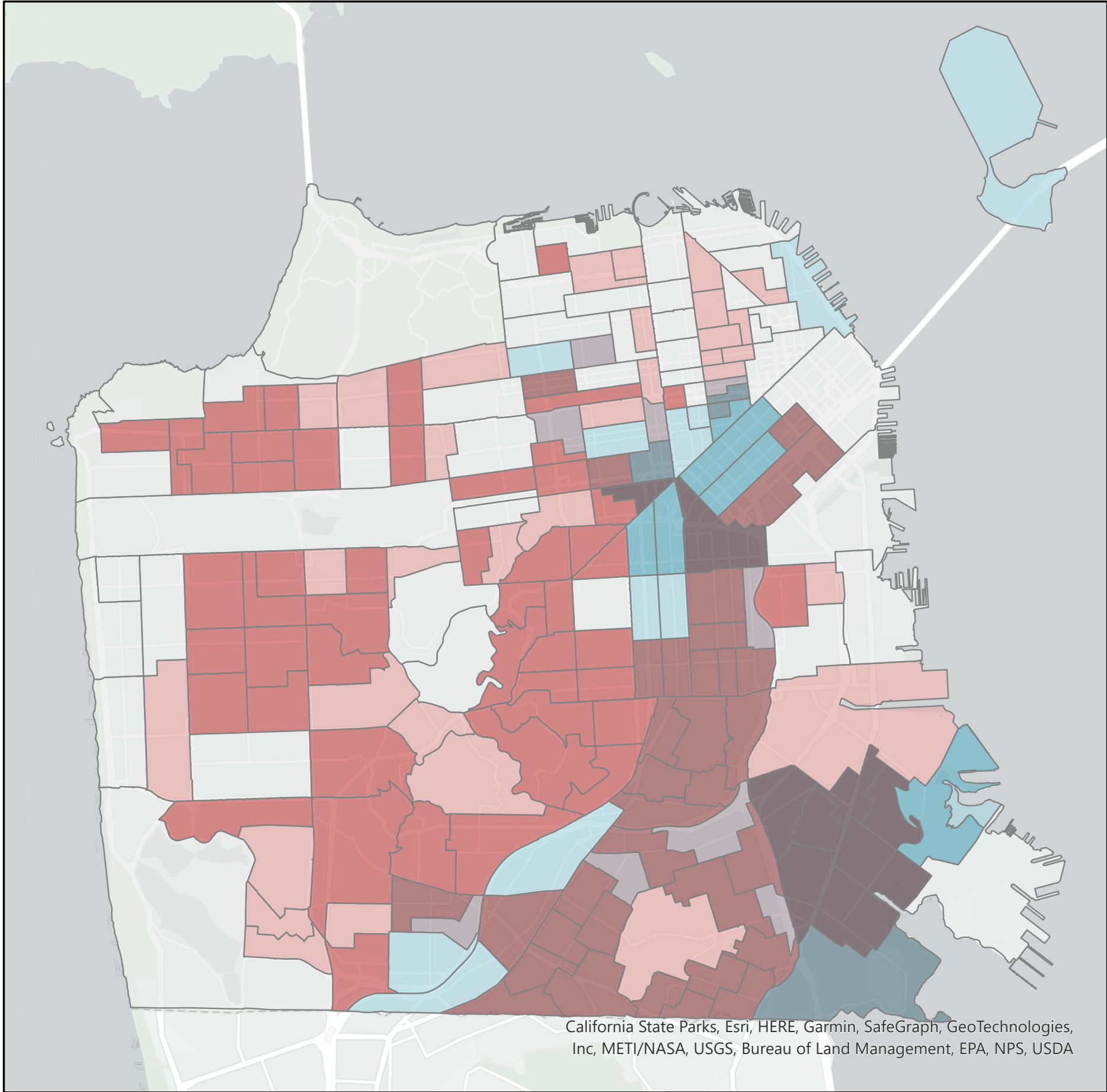
Places exposed to the highest density of Fine Particulate Matter do not have the highest tree canopy coverage in San Francisco.

The third map in this series combines the first two maps to find out where in the city is most exposed to extreme heat wave temperatures and high pollution. The areas with the lowest tree canopy coverage are layered over that.

We can begin to see which areas of San Francisco would most benefit from more trees with this map. The darkest red represents places with the greatest exposure to both heat and pollution with the lowest tree canopy density.

# Heat and Air Quality Resilience Mapping

Health Focus: Diabetes



<b>Heat Wave Temperatures and Diabetes Hospitalizations</b>		
<ul style="list-style-type: none"> <li>Diabetes Hospitalizations</li> <li>Average Surface Temperature</li> <li>High</li> <li>Low</li> <li>LowHigh</li> </ul>	<p>Heat Wave values from September 2nd, 2017 Historic Heat Wave Data</p> <p>Hospitalizations due to Diabetes per 10K People</p>	
<small>Credits : NASA ASTER and San Francisco Department of Public Health</small>		<small>2023</small>



<b>Focus Areas Based on Diabetes Hospitalizations</b>		
<ul style="list-style-type: none"> <li>0-5% Tree Canopy Coverage, Highest Poverty</li> <li>5-10% Tree Canopy Coverage, Highest Poverty</li> <li>0-5% Tree Canopy Coverage</li> <li>5-10% Tree Canopy Coverage</li> </ul>	<p>All target areas had medium to highest exposure to high temperatures and high Particulate Matter. Temperatures ranged between 112-119 degrees and Mean Average Particulate Matter between 9-19 PPM. They also had diabetes hospitalizations between 12.23-32 people per 10K residents. All areas had low tree canopy coverage ranging from 0-10% coverage.</p>	
<small>Credits : San Francisco Department of Urban Forestry and San Francisco Department of Public Health</small>		<small>2023</small>

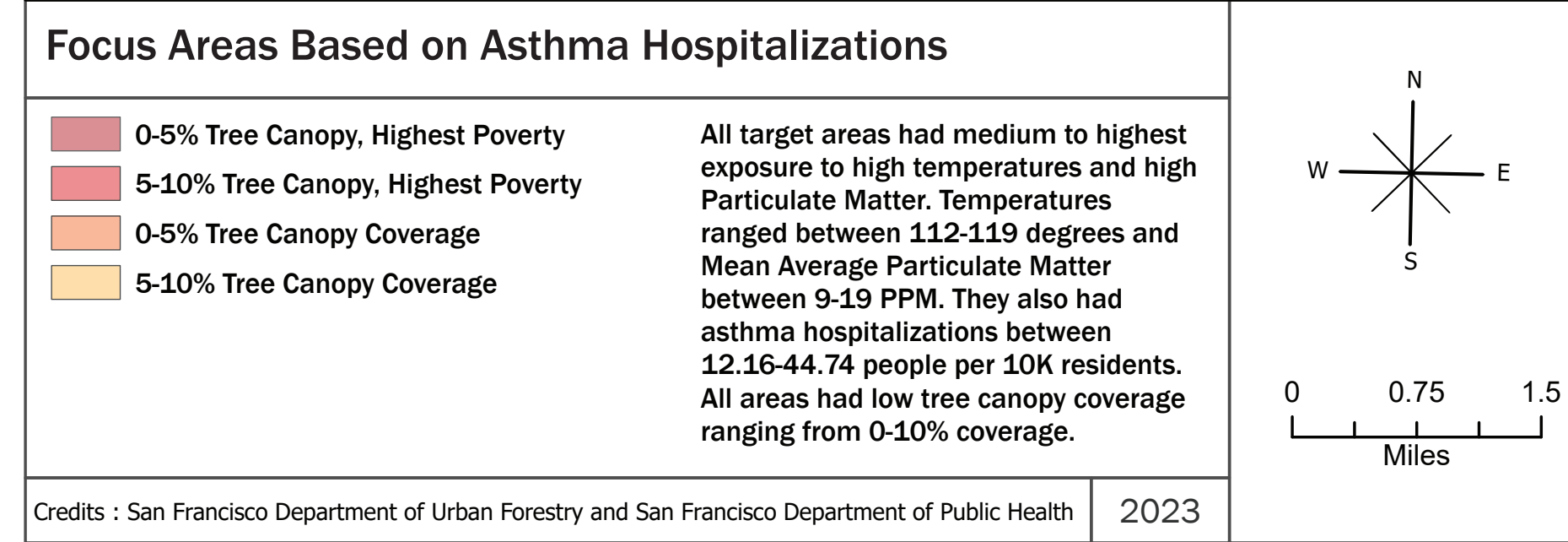
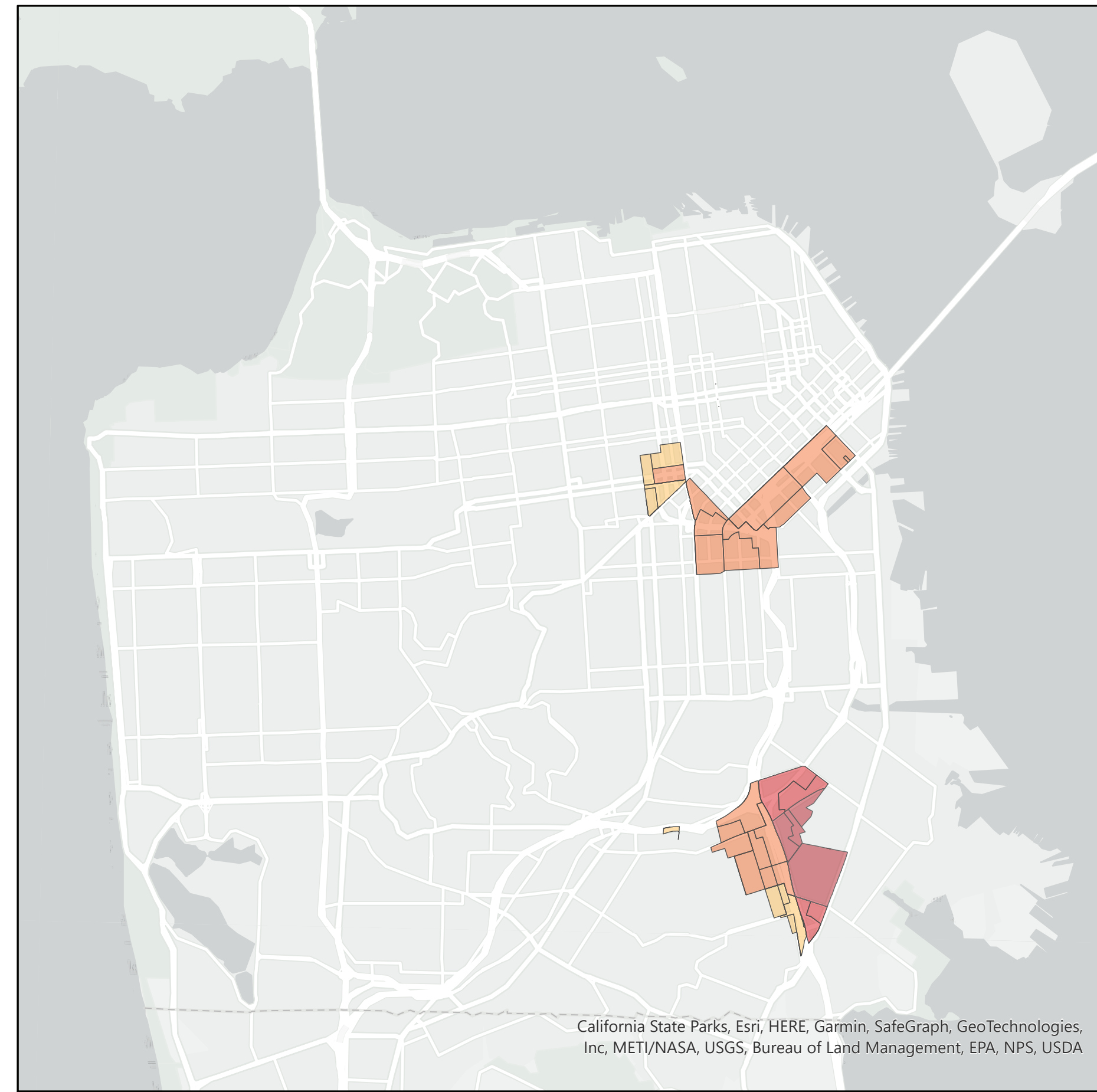
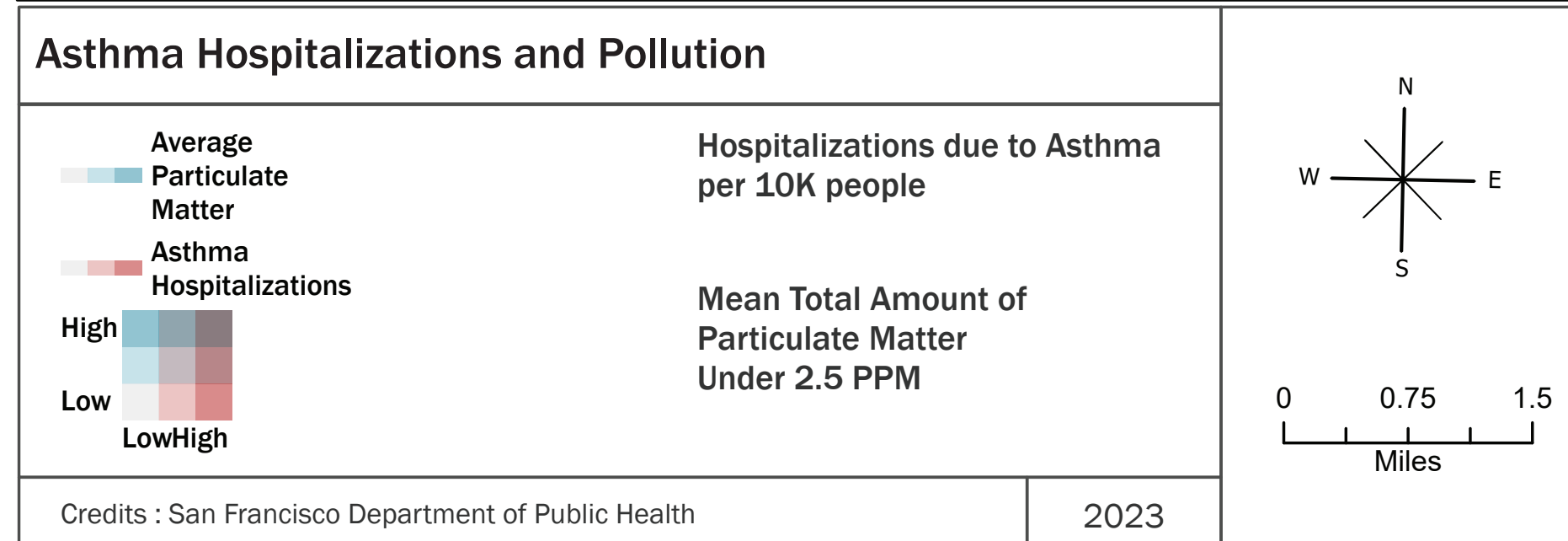
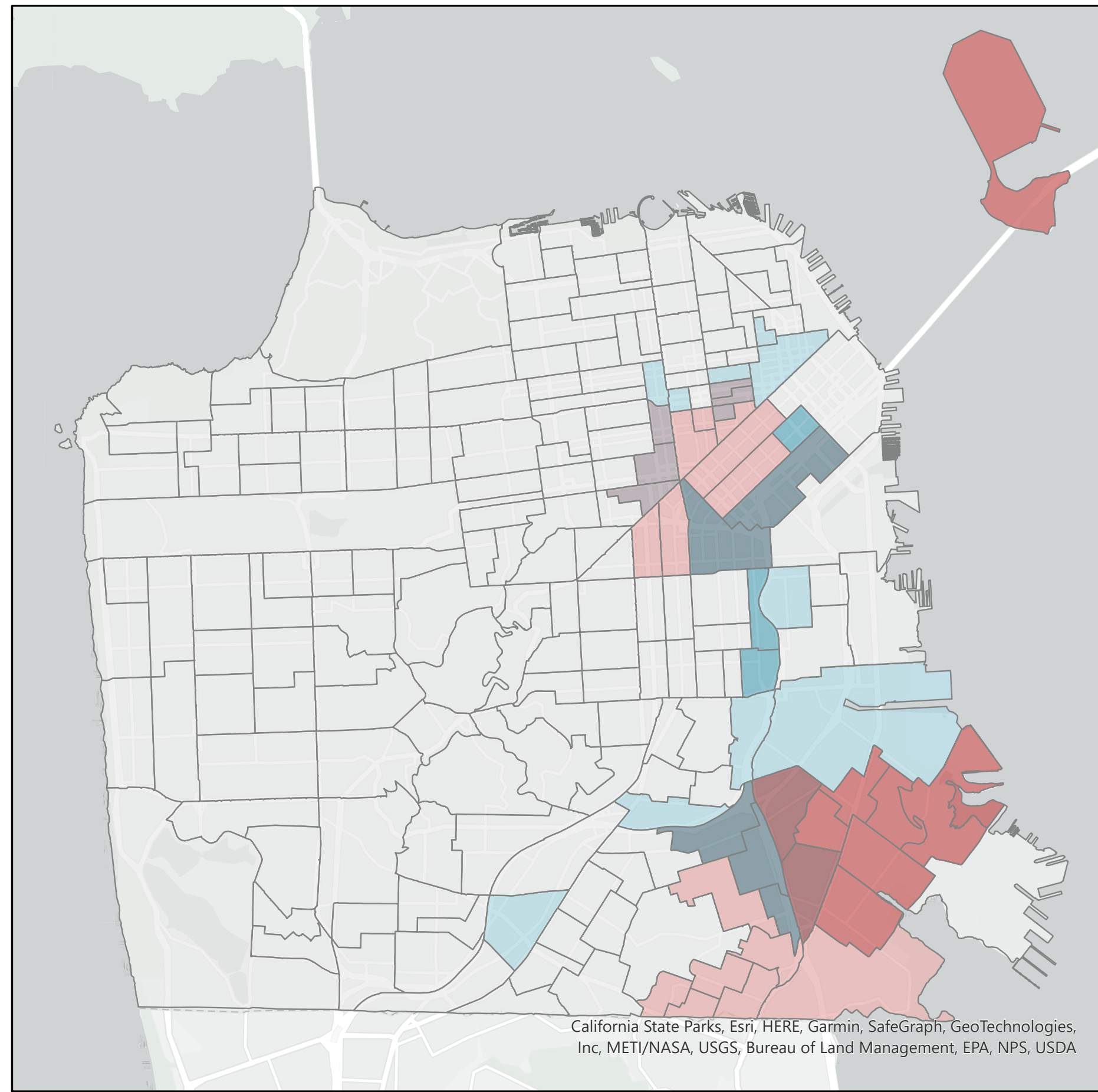
We know that heat waves can exacerbate symptoms of diabetes and lead to hospitalizations for those who cannot manage their diabetes.

The neighborhoods in purple are places where high heat wave temperatures and high diabetes hospitalizations co-occur. Other neighborhoods in the city may have residents with diabetes, but the hospitalization data shows us where people are not able to manage the symptoms of diabetes in a heat event.

By combining the data of areas with the lowest tree canopy, highest temperatures, highest pollution exposure, highest diabetes hospitalizations and highest poverty, we can identify which neighborhood needs to be prioritized for tree planting.

# Heat and Air Quality Resilience Mapping

Health Focus: Asthma



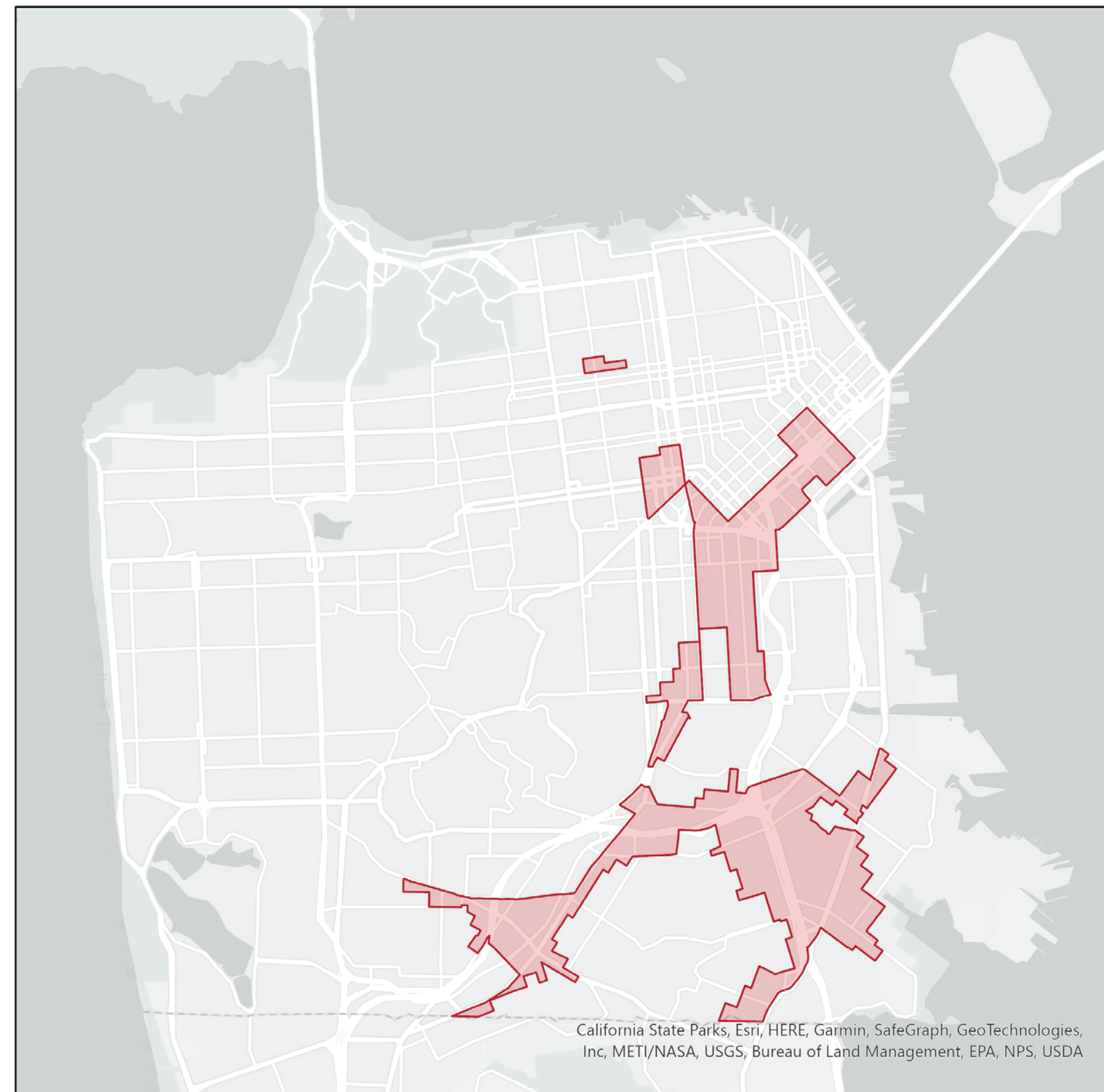
We know that particulate matter exposure can exacerbate symptoms of asthma and lead to hospitalizations for those who cannot manage their asthma at home.

The neighborhoods in purple are places where the highest concentrations of fine particulate matter and high asthma hospitalizations co-occur. Other neighborhoods in the city may have residents with asthma, but the hospitalization data shows us where people are not able to manage the symptoms of asthma.

By combining the data of areas with the lowest tree canopy, highest temperatures, highest pollution exposure, highest asthma hospitalizations and highest poverty, we can identify which neighborhood needs to be prioritized for tree planting.

# Heat and Air Quality Resilience Mapping

## Priority Areas and Tree Planting

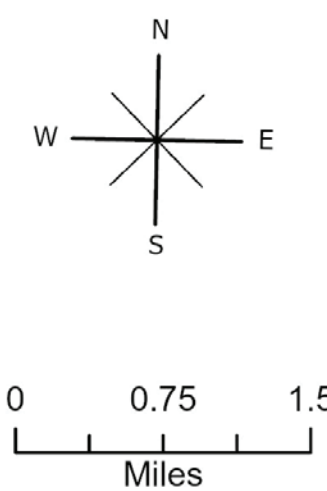


California State Parks, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, USDA

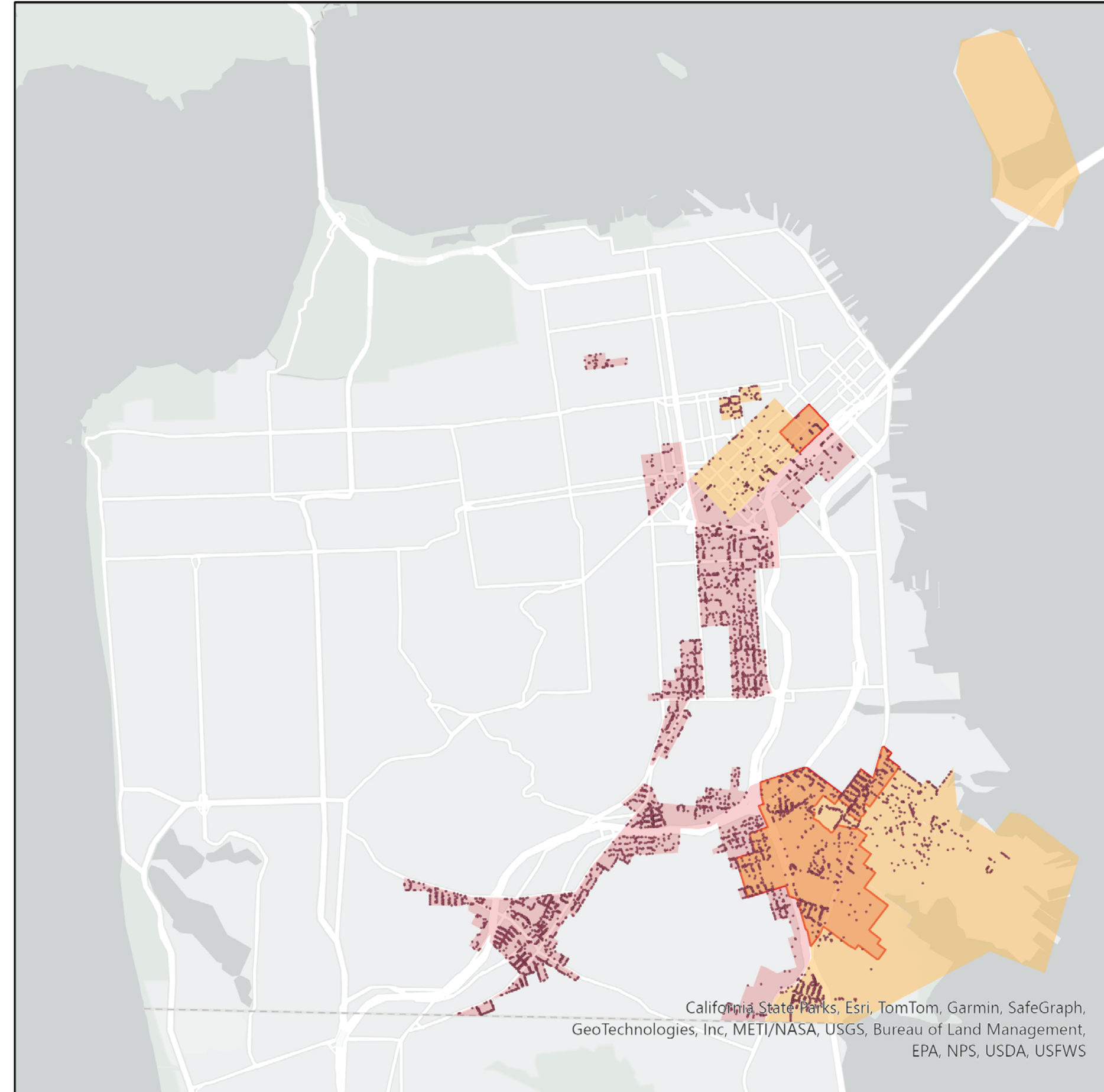
### HAQR Tree Planting Priority Area

Priority Area

All priority areas had medium to highest exposure to high temperatures and high Particulate Matter. Temperatures ranged between 112-119 degrees and Mean Average Particulate Matter between 9-19 PPM. All areas had low tree canopy coverage ranging from 0-10% coverage. All priority areas had medium to high hospitalizations due to diabetes or asthma.



Credits : San Francisco Department of Urban Forestry and San Francisco Department of Public Health | 2023



California State Parks, Esri, TomTom, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, USDA, USFWS

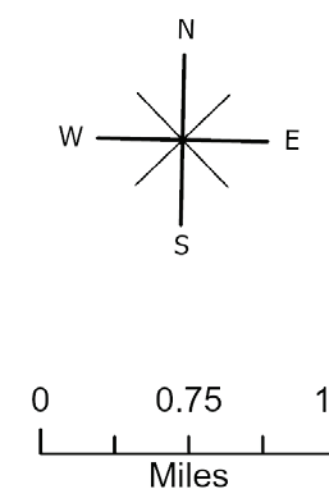
### Priority Areas and Empty Tree Wells

HAQR Identified Priority Area  
 Cal EnviroScreen Disadvantaged Communities  
 Cal Enviro Screen and HAQR Identified Priority Areas Overlap  
 Empty or Potential Tree Wells in Identified Areas

1053 empty or potential tree wells in super priority area.

2,123 empty or potential tree wells in Cal EnviroScreen Priority Area

5, 237 empty or potential tree wells in HAQR Priority Area.



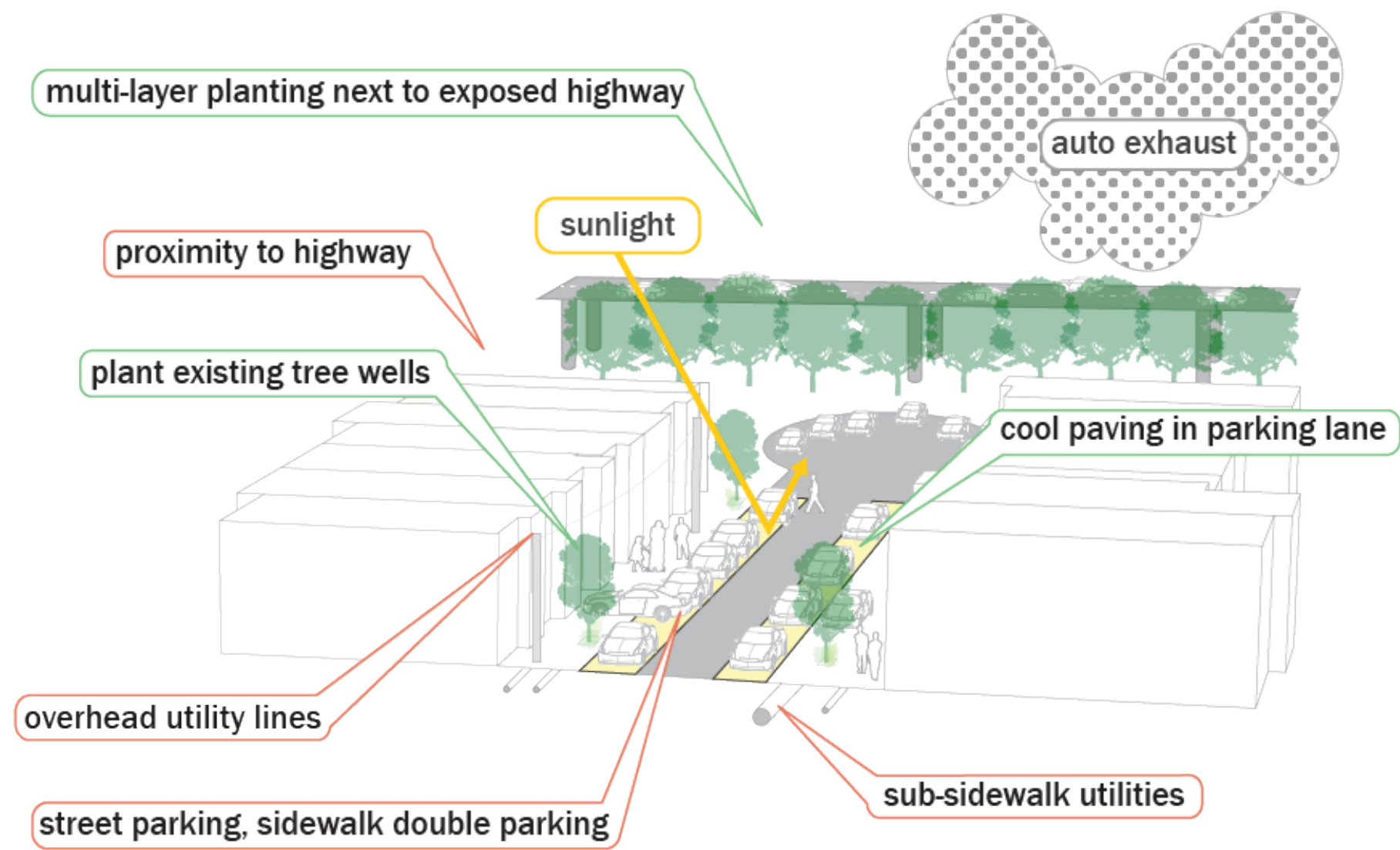
Credits : San Francisco Department of Urban Forestry and San Francisco Department of Public Health | 2024

Combining both the Asthma Focus Areas and the Diabetes Focus Area, we can create an outline of the areas throughout the city that would be best served by a denser tree canopy.

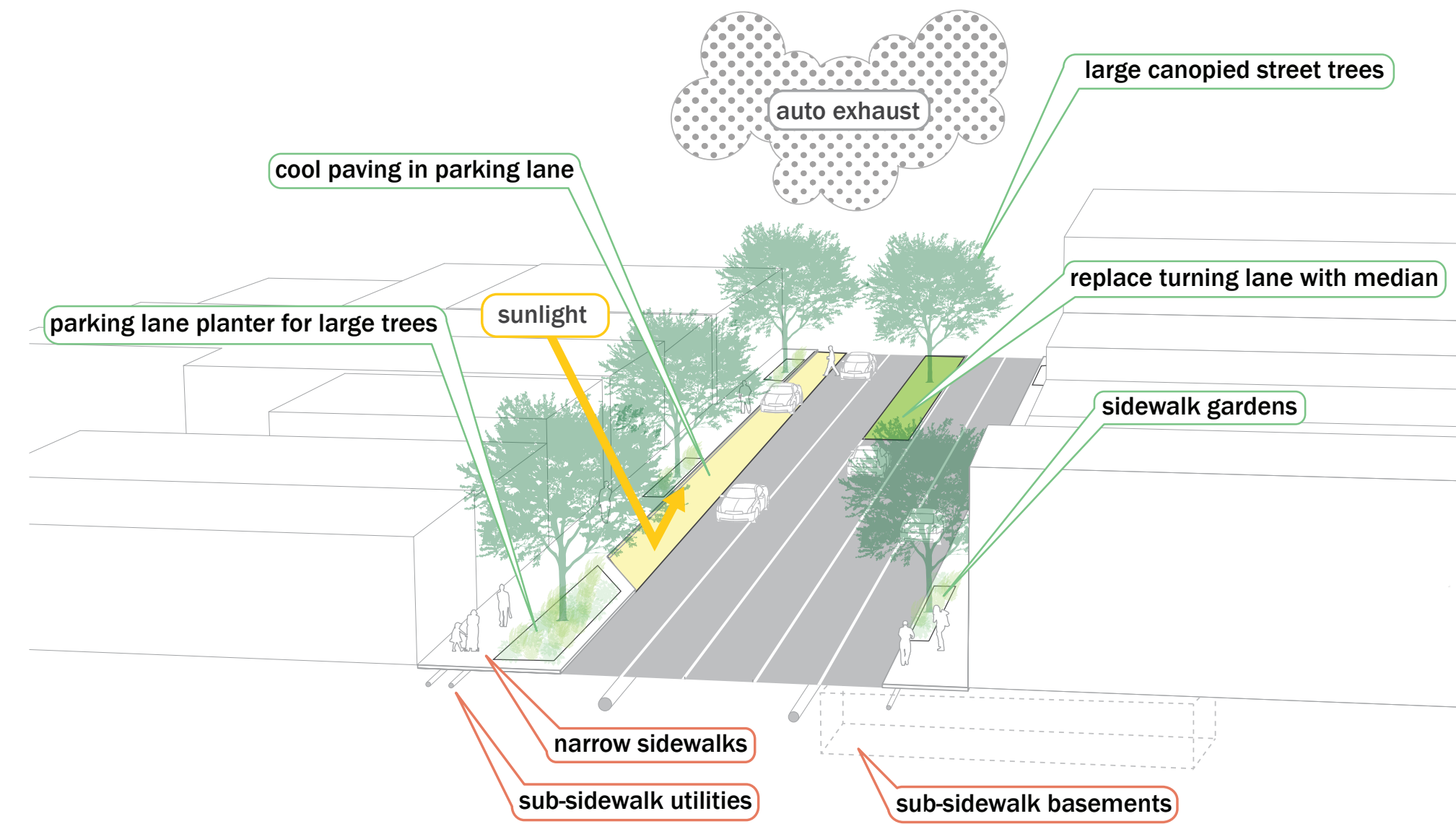
**Identifying places for new tree plantings.**  
 The Bureau of Urban Forestry's recent acquisition of a grant funding street tree planting across the city meant we needed to prioritize where in the city would be most impacted by those trees, as well as how many potential trees could go into these areas. We can quantify the cost of planting and maintaining these identified tree wells.

# Urban Typologies in Identified Priority Zones

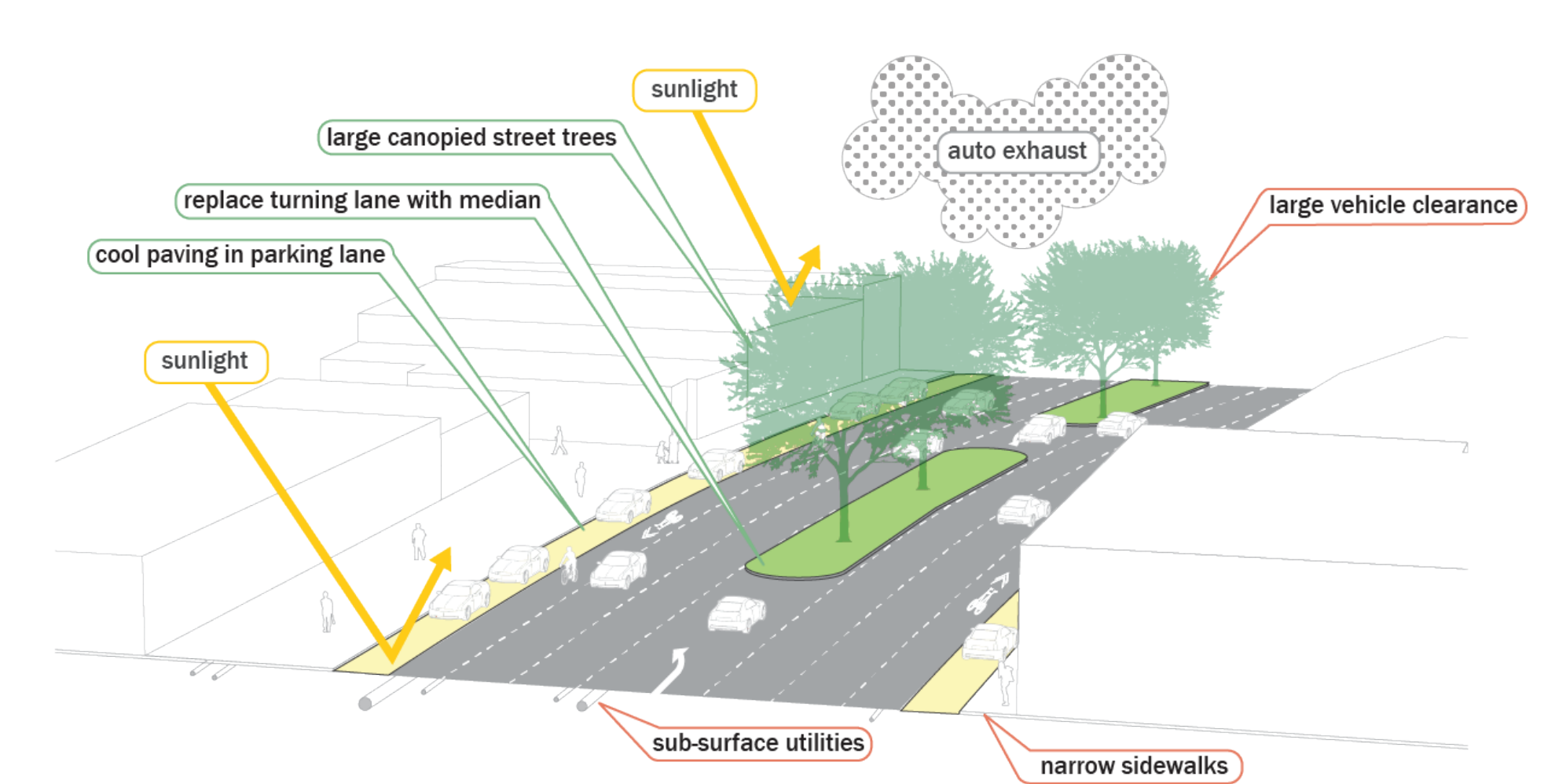
## Silver Terrace: Residential Typology



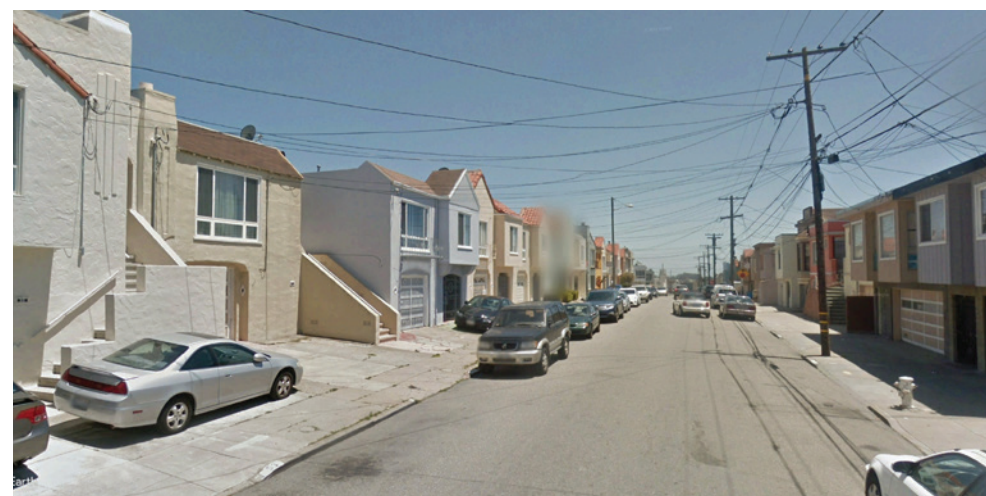
## SoMa: Urban Typology



## Bayview: Industrial Typology



## Existing Conditions



Scotia Ave & Quint St

Elmira St & Augusta St

### OPPORTUNITIES:

- Plantings in residential areas have a direct impact on residents, can reduce electric bills, and improve health outcomes.
- Roads tend to be narrower and traffic volumes low.
- Residential areas have more "eyes on the street" and residents can more actively assist in ensuring long-term tree health.

### CONSTRAINTS:

- Many residential areas have overhead utility lines that limit the size of trees that can be planted.
- Narrower sidewalks also limit the size of trees that can be planted.
- Parking is often happening in a non-standard manner due to unmet housing and transportation needs.
- Some residential areas are adjacent to Caltrans right-of-way that is not under City control.

### RECOMMENDATIONS:

- Select a palette of smaller trees that can do well under utility lines and in smaller tree basins.
- Plant large tree species wherever possible.
- Enlarge tree basins wherever possible or use chicanes to add trees and slow traffic.
- Explore school yard greening with SFUSD to increase tree canopy and reduce pavement.
- Support MTA's Community Mobility planning to ensure resident's have access to the transportation they need for daily life to reduce car use.
- Support citywide housing initiatives to increase affordable housing that can decrease crowded living conditions which also causes multiple cars per household.
- Partner with Caltrans to explore greening in priority zones within their right-of-way.

## Existing Conditions



8th St & Folsom St

Bryant St & Morris St

### OPPORTUNITIES:

- Large right-of-way
- Less overhead utilities.

### CONSTRAINTS:

- High traffic volumes
- Narrow sidewalks
- Sub-sidewalk basements and major underground utilities more frequently found in these corridors.

### RECOMMENDATIONS:

- Plant trees wherever possible along the curbside.
- Create additional space for trees using bulbouts.
- Study the potential of adding a central median to accommodate large shade trees.

## Existing Conditions



Cesar Chavez St & Kansas St

Bayshore Boulevard & Oakdale Ave

### OPPORTUNITIES:

- Large right-of-way
- Less overhead utilities.
- Often overlaps with bicycle infrastructure that could use improvement.

### CONSTRAINTS:

- High traffic volumes
- Narrow sidewalks
- Sub-sidewalk basements and major underground utilities more frequently found in these corridors.

### RECOMMENDATIONS:

- Plant trees wherever possible along the curbside.
- Explore how improved bicycle and pedestrian infrastructure could be combined with additional tree planting to create safer streets for all.
- Study the potential of adding central medians to accommodate large shade trees and create pedestrian refuge at crossings.

# Heat and Air Quality Mapping Methodology

## Heat and Pollution Exposure:

The heat data in the heat and pollution map was sourced from the NASA Aster Data (SFDPH). The classes were created using Natural Breaks and are as follows:

97-100 Degrees Fahrenheit  
101-107 Degrees Fahrenheit  
108-111 Degrees Fahrenheit  
112-114 Degrees Fahrenheit  
115-119 Degrees Fahrenheit

The pollution data was created using the 2019 Bay Area Air Quality Management District Data, the classes are sorted as follows:

7.8-8.7 PM  
8.8-9.8 PM  
9.81-11.4 PM  
11.41-14 PM  
14.1-19 PM

The two pollution categories were generalized using the bottom three classes.

High Pollution: 11.41-19 PM  
Medium Pollution: 9.81-11.4 PM

## Tree Canopy And Pollution

The tree canopy coverage layer was sourced from a 2018 Forest Service Canopy Raster, ran through raster to polygon tool in ArcGIS Pro and is sorted via Census Block group, it was sorted using Natural Breaks.

The classes for the data are as follows:

0-5%  
6-10%  
11-16%  
16-31%  
32-60%

Then the two pollution categories from **Heat and Pollution Exposure** were added:

High Pollution: 11.41-19 PM  
Medium Pollution: 9.81-11.4 PM

## Heat and Pollution Exposure Combined with Tree Canopy

To accurately capture the true need of communities, this map combines the previous heat and pollution map with the current tree canopy coverage of the city.

The hottest areas (those with temperature measurements between 112-119 degrees during the September 2nd, 2017 heat wave) and the highest pollution scores (places with a mean value between 9-19) were overlaid and intersected.

Then, a tree canopy coverage percentage map using census tracts was overlaid. The two designated lowest canopy zones either had 0-5% tree canopy coverage or 5-10% tree canopy coverage. An important distinction was that overall tree canopy was chosen, not street tree canopy. We did not want to discredit the impact canopy from large parks had on certain neighborhoods.

Areas across the city are impacted by heat, pollution and low tree canopy, but the impacts of heat and pollution are less manageable by certain groups depending on a multitude of factors (See Map 1, Heat Vulnerability Index). The goal of this study is to identify places that are disproportionately impacted by environmental impacts

## Heat Wave Temperatures and Diabetes Hospitalizations

This map was created with the Diabetes Hospitalizations per 10,000 People using the San Francisco Department of Public Health Data. The Average Surface Temperature data was from the San Francisco Department of Public Health Data set as well and refers to the September 2nd, 2017 Heat Wave Data collected by the NASA ASTER Radiometer.

The bivariate colors are classified to reflect the class divisions from earlier heat and pollution map.

Temperature  
Low: 0-111  
Medium: 111.1-114  
High: 114.1-119

Diabetes Hospitalizations  
Low: 0-12.22  
Medium: 12.23-20.6  
High: 20.7-32

## Asthma Hospitalizations and Average Particulate Matter

This map uses the Average Particulate Matter measurements from SFDPH. The Particulate Matter map from the Heat and Pollution Map is sorted into census blocks, this map has particulate matter sorted into census tracts so it can be used in conjunction with Asthma Hospitalizations per 10K People which were sorted by census tracts as well.

### Asthma Hospitalizations

Low: 0-12.15

Medium:12.16-18.53

High:18.54-44.74

### Average Particulate Matter

Low: 0-9.7

Medium: 9.8-11.41

High: 11.42-13.6

## Asthma Focus Area Map:

To prioritize neighborhoods that are suffering the impacts of heat and pollution disproportionately, this map selects areas using the lowest tree canopy coverage, highest pollution, highest heat wave data, and medium to high asthma hospitalizations. Then poverty is overlaid to find who has the least resources to address these problems.

This map uses the two lowest categories of tree canopy coverage from the Tree Canopy And Pollution Map page. Tree Canopy Coverage was either

0-5%

5-10%

The Mean Average Particulate Matter fell into one of these categories:

High Pollution: 11.41-19 PM

Medium Pollution: 9.81-11.4

The Heat Wave Temperature fell into one of two categories:

112-114 Degrees

115-119 Degrees

The Asthma Hospitalizations followed the categories laid out in the Asthma Hospitalizations and Average Particulate Matter Map.

Medium:12.16-18.53

High:18.54-44.74

Poverty data as defined by SFDPH as "Percent of population with an income under 400% of the federal poverty rate by census tract, 2017-2021." It was sorted into classes using Normal Breaks, then the High Class ranking was used in this map.

### Poverty:

Low: 0-47.08%

Medium: 47.09%-65.12%

High: 65.13-100%

**Diabetes Focus Area Map:**

To prioritize neighborhoods that are suffering the impacts of heat and pollution disproportionately, this map selects areas using the lowest tree canopy coverage, highest pollution, highest heat wave data, and medium to high diabetes hospitalizations. Then poverty is overlaid to find who has the least resources to address these problems.

This map uses the two lowest categories of tree canopy coverage from the Tree Canopy Additions page. Tree Canopy Coverage was either

0-5%

5-10%

The Mean Average Particulate Matter fell into one of these categories:

High Pollution: 11.41-19 PM

Medium Pollution: 9.81-11.4

The Heat Wave Temperature fell into one of two categories:

112-114 Degrees

115-119 Degrees

The Diabetes Hospitalizations followed the categories laid out in the Heat Wave Temperatures and Diabetes Hospitalizations map.

Medium: 12.23-20.6

High: 20.7-32

Poverty data as defined by SFDPH as “Percent of population with an income under 400% of the federal poverty rate by census tract, 2017-2021.” See the Heat and Poverty map for classification and histogram.

High: 65.13-100%

**HAQR Tree Planting Priority Area:**

This map combines the outline of all areas from the Diabetes Focus Area Map and the Asthma Focus Area Map to define what areas should be prioritized for tree planting.

**Priority Areas and Empty Tree Wells:**

Uses the HAQR Tree Planting Priority Area layer combined with the CalEnviroscreen 2022 Disadvantaged Communities shapefile. Adds the Bureau of Urban Forestry 2023 Empty and Potential Tree Well layer.

# Heat and Air Quality Mapping Sources

## Poverty data:

Definition: Percent population with an income under 400% of the federal poverty rate

Data source: U.S. Census Bureau's 2017 – 2021 American Community Survey 5-year estimates

[Visualizing climate health impacts in San Francisco | San Francisco \(sf.gov\)](#)

## Tree Canopy Coverage:

2018 United States Forest Service Canopy Raster

<https://data.fs.usda.gov/geodata/rastergateway/tree-canopycover/#table1>

## Asthma Hospitalizations per 10K People:

Population with asthma and chronic obstructive pulmonary disease (COPD)

Definition: Age-adjusted rate of ED visits for asthma and COPD per 10,000 residents

Data source: California Department of Health Care Access and Information, Emergency Department data, 2013 – 2017

[Visualizing climate health impacts in San Francisco | San Francisco \(sf.gov\)](#)

## Diabetes Hospitalizations per 10K People:

Definition: Age-adjusted rate of ED visits for diabetes per 10,000 residents

Data source: California Department of Health Care Access and Information, Emergency Department data, 2013 – 2017

[Visualizing climate health impacts in San Francisco | San Francisco \(sf.gov\)](#)

## PM 2.5 Parts Per Million:

Definition: Annual average PM2.5 concentration in micrograms per meters cubed

Data source: San Francisco Department of Public Health, and San Francisco Planning Department, The San Francisco Citywide Health Risk Assessment: Technical Support Documentation, September 2020

[Visualizing climate health impacts in San Francisco | San Francisco \(sf.gov\)](#)

## Heat Wave Data:

Surface temperature was collected using land surface kinetic temperature data from NASA's Advanced Spaceborne Thermal Emission and Reflection Radiometer (ASTER) satellite for September 2, 2017, a record-breaking heat wave in the San Francisco Bay Area.

<https://sf.gov/data/visualizing-climate-health-impacts-san-francisco>

## Enviroscreen Data:

SB 535 Disadvantaged Communities (2022 Update)

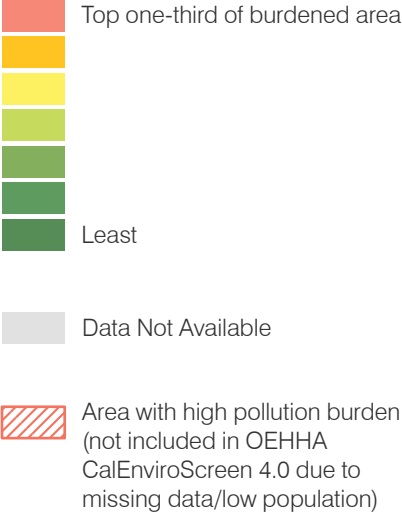
[SB 535 Disadvantaged Communities | OEHHA \(ca.gov\)](#)

## Empty Treewells and Potential Tree Wells:

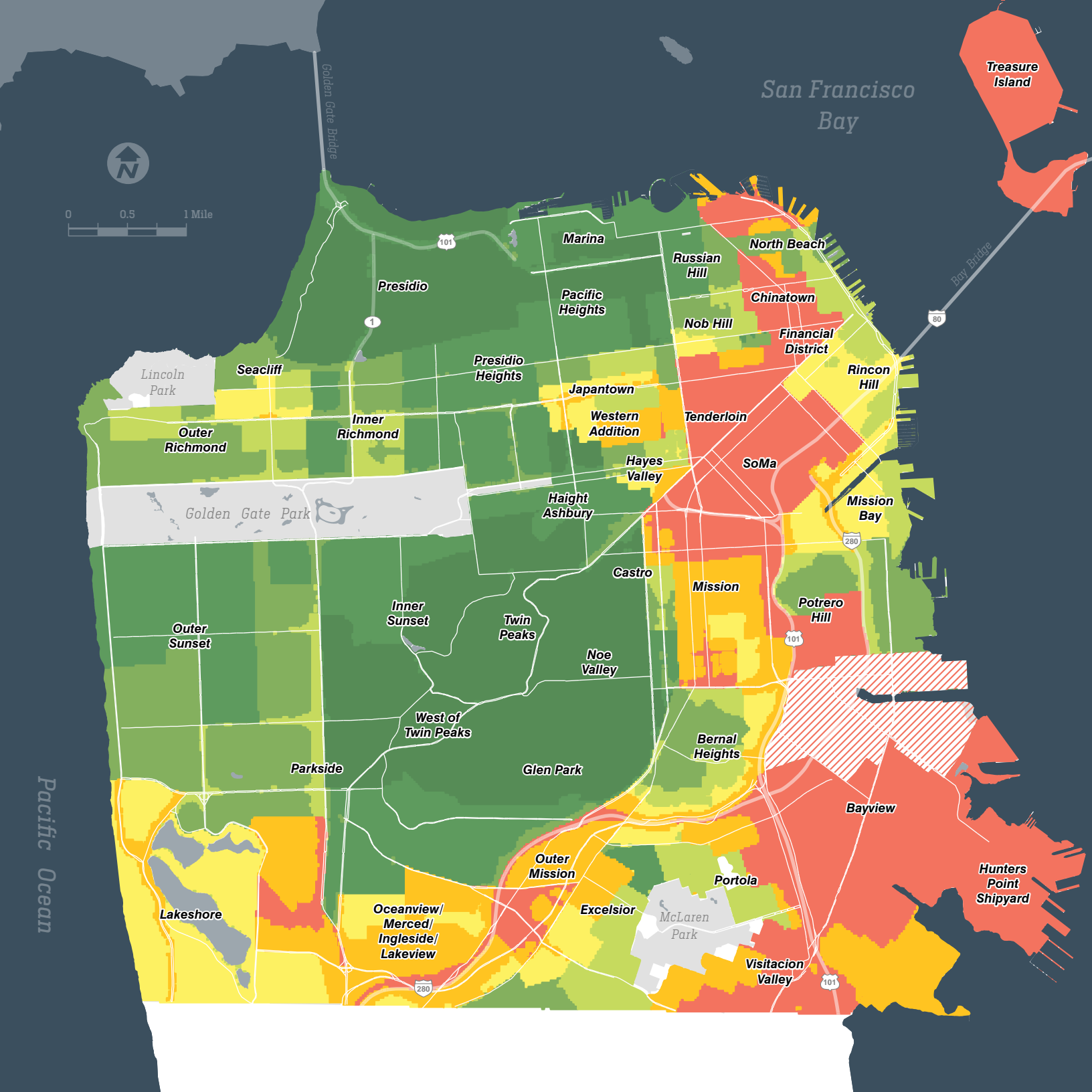
2023 Bureau of Urban Forestry Internal File

# Environmental Justice Communities

## Environmental Justice Burden



NOTE: This map was created to meet the requirements of CA Senate Bill 1000. The legislation requires that municipalities identify where "Disadvantaged Communities" are located, defined as areas facing elevated pollution burden coupled with a high incidence of low-income residents. This map is based on OEHHA's CalEnviroScreen 4.0 Map, modified to incorporate additional local data on pollution burden and socioeconomic disadvantage.



**October 7, 2025**

Mayor Daniel Lurie  
Office of the Mayor  
City Hall, Room 200  
San Francisco, CA 94102  
[Daniel.Lurie@sfgov.org](mailto:Daniel.Lurie@sfgov.org)

**Subject: An Urgent Call for Environmental Justice and the Repeal of Public Works Order 187246**

Dear Mayor Lurie,

For over two decades, the South of Market Community Action Network (SOMCAN) has been advocating and organizing Filipino families, seniors, tenants, and workers in the South of Market (SOMA). We write to you today about a physical, daily, and systemic injustice being inflicted on our community.

The lack of tree canopy in SOMA is a public health crisis, and our community is at its center. SOMA has a tree canopy of just 2.7%, a fraction of the city's 12.8% average. This is not just an aesthetic preference – it is a severe health inequity.

As our 2023 report “[Urban Air Pollution Impacts on Health, Wellness, and Safety](#)” details, our community lives in a state of extreme environmental burden. We are a designated Environmental Justice community with one of the city’s highest pollution burdens. Residents of SOMA are exposed to substantial air pollution due to its proximity to Interstate 80, Interstate 280, and Highway 101, and in 2020, SOMA had the highest yearly average particulate matter concentrations out of any neighborhood in San Francisco. Many of the alleyways where our families live are included in the SOMA Youth and Family Special Use District, which was created in 2008 to “protect and enhance the health and environment of youth and families.” For our youth and families, trees are not a luxury but essential public health infrastructure.

We have learned through the recent “[Concrete Over Canopy](#)” report that the city is actively making this crisis worse in two ways:

1. **A Toxic Policy:** [Public Works Order 187246](#) is guaranteeing the net loss of our few remaining trees, ordering our empty tree wells to be filled with concrete.
2. **Misspent Funds:** A \$12 million federal grant, money that was intended to help disadvantaged communities like ours, was diverted away from in-need census tracts in SOMA, the Tenderloin, and the Bayview.

This is a profound moral failure. The city is systematically removing our community's trees while giving away the money that was meant to plant them. For this reason, the city's current policy regarding tree canopy coverage is not just a failure – it is a severe environmental injustice.

This neglect for our neighborhood must end. SOMCAN joins a growing city-wide coalition, including the SOMA West Neighborhood Association, Hayes Valley Neighborhood Association, the Coalition for San Francisco Neighborhoods (CSFN), and the UCSF Center for Climate, Health, and Equity, to advocate for the following:

- We endorse the findings of the “Concrete Over Canopy” report.
- We demand the immediate repeal of Public Works Order 187246.
- We demand the passage of a “San Francisco Tree Equity Ordinance” that legally mandates the city close the canopy gap in SOMA and all other Environmental Justice communities.

Our community has borne the brunt of the city's environmental burdens for decades. We refuse to continue bearing the burden of environmental neglect. We expect your immediate action.

Sincerely,



Angelica Cabande

Executive Director

South of Market Community Action Network (SOMCAN)

CC:

Supervisor Matt Dorsey, [Matt.Dorsey@sfgov.org](mailto:Matt.Dorsey@sfgov.org)

Supervisor Bilal Mahmood, [Bilal.Mahmood@sfgov.org](mailto:Bilal.Mahmood@sfgov.org)

Supervisor Jackie Fielder, [Jackie.Fielder@sfgov.org](mailto:Jackie.Fielder@sfgov.org)

Carla Short, Director of San Francisco Public Works, [Carla.Short@sfdpw.org](mailto:Carla.Short@sfdpw.org)

Jesus Lozano, Urban Forestry Council Coordinator, [Jesus.Lozano@sfgov.org](mailto:Jesus.Lozano@sfgov.org)

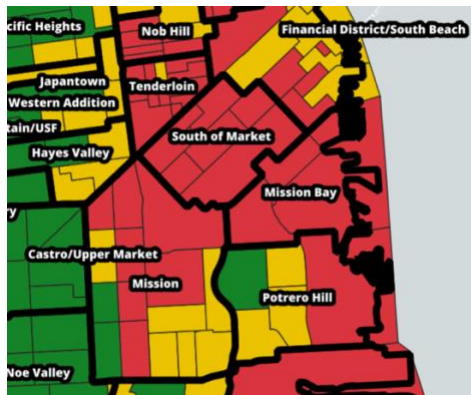
23 September 2025

San Francisco Tree Equity Ordinance Request

Honorable Mayor Lurie, Supervisor Dorsey and Urban Forestry Council Members,

On Friday, 9/26/25, Shaun Aukland will make a presentation to the Urban Forestry Council (Agenda Item 6) on urban forestry policies and tree distribution outcomes that highlights the disparity in urban canopy cover across neighborhoods throughout the city and will propose that the city develop a new ordinance that addresses tree canopy equity, targeting first designated environmental justice communities (EJCs) and then neighborhoods ranked in the bottom 1/3 of the city's rankings, which includes our area. We, the South Beach| Rincon|Mission Bay Neighborhood Association board, are writing to support this request.

With portions of South Beach and ALL of Mission Bay among the lowest rated for canopy cover—Mission Bay clocks in at only 3.2% as compared to the city average of 12.8%--we empathize with the even more disadvantaged EJCs and seek redress once their canopies are boosted. See a portion of the lowest ranking canopy areas below, in red.



For its substance, clarity and documentation, we endorse the SoMa West NA letter issued on this matter, attached for reference.

Sincerely,

The South Beach | Rincon | Mission Bay Neighborhood Association Board

Alice Rogers, President

Gary Pegueros, Vice President /Secretary

Michael Adams, Director

Bruce Agid, Director

Shelley Costantini, Director

Mike Linksvayer, Director



September 14, 2025

The Hon. Daniel Lurie  
Office of the Mayor  
City Hall, Room 200  
San Francisco, CA

Re: A Call for Tree Equity for SOMA West and the City's Environmental Justice Communities

Mayor Lurie,

The SOMA West Neighborhood Association applauds the new direction in local governance that uses a data-driven approach to correct long standing neighborhood inequities. We believe the time has come to similarly extend this principle of restorative justice to our City's urban forest.

Recent legislation has established a clear and most welcome precedent. Supervisor Mahmood's One City Shelter Act acknowledges that a few neighborhoods, including SOMA, have shouldered a disproportionate share of the city's homelessness crisis.<sup>1</sup> Additionally, your own office's Family Zoning Plan recognizes that new housing has been concentrated in eastern neighborhoods while well-resourced areas have been insulated from growth.<sup>2</sup> Both initiatives seek to create a more balanced and equitable system.

This new political consensus finally concedes as unjust the treatment of neighborhoods like ours as "containment zones" for the city's challenges. Further, state legislation like Senate Bill 1000, which mandates that cities redress neighborhood environmental inequities, and Assembly Bill 2251, which calls for a 10% expansion of the urban canopy, adds legal weight to this moral imperative. This commitment to fairness must now also extend to the fundamental right to a healthy environment and the benefits of a robust urban tree canopy.

### **SOMA West's Canopy Deficit: A Public Health Emergency**

While our neighborhood absorbed a 39% population increase in the last decade, we have been starved of the environmental infrastructure to support this density. The lack of tree canopy in SOMA West is an environmental and public health emergency.

Trees are critical public health infrastructure. They filter harmful air pollutants like PM2.5, which are linked to asthma and heart attacks, and they cool surface temperatures during heat waves. We endorse the findings of Shaun Aukland’s August 2025 report, [Concrete Over Canopy: How San Francisco is Failing Its Environmental Justice Communities](#). The report provides irrefutable evidence that the City has failed to prioritize communities in need and is not assigning funding and resources with equity in mind for what is needed to close the gap on tree canopies throughout the City.

SOMA West has a tree canopy cover of a mere 2.7%, a fraction of the 12.8% average citywide.<sup>3</sup> This is not an aesthetic concern; it is a direct threat to our community’s health. As the data below shows, SOMA West is an officially designated Environmental Justice Community (EJC) facing severe, overlapping environmental and health risks.

Metric	SOMA West Status	City/State Benchmark	Source
Tree Canopy	2.7% (Very Low)	12.8% (SF Average)	US Forestry Lidar Scan
10-Year Population Growth	+39%	+2.3% (SF Average)	US Census
Pollution Burden	Top 10%	City Percentile	CalEPA
EnviroScreen Score	Top 7%	City Percentile	CalEnviroScreen 4.0
Air Pollutant Zone	Included in APEZ	N/A	SFDPH
Health Vulnerability	High	City-wide Index	SFDPH HVI
Planning Designation	Designated EJC	N/A	SF Planning

While SOMA is one of the communities facing tree inequity, we are far from the only one. Much of the eastern part of San Francisco faces similar challenges with low canopy cover and are designated as *Environmental Justice Communities (EJC)*.<sup>6</sup> We seek not just to address the wrongs in SOMA, but in all underserved communities in San Francisco. Without policy guidance, municipal departments often focus tree resources on neighborhoods where it is easy to plant, rather than where it’s most needed. While understandable given limited resources, this strategy can lead to a profound canopy equity gap such as what we are currently experiencing in San Francisco.

### The Solution: A San Francisco Tree Equity Ordinance

Existing policies and departmental discretion are insufficient. The best way to guarantee the just and equitable distribution of our urban forest is through new, legally binding legislation. We urge you to champion a San Francisco Tree Equity Ordinance. This ordinance must be a permanent, structural solution that includes the following principles:

1. **Equity-Driven:** Legally mandate that a disproportionate percentage of the City’s annual tree budget and resources be directed to designated EJC’s until canopy gaps are demonstrably closed.
2. **Outcome-Based:** Establish clear, neighborhood specific canopy targets and timelines,

such as reducing the canopy gap between each EJC and the citywide average by 50% within ten years. Mandate resources are increased for EJC's that continue to fall below their target canopy.

3. **Funded and Sustainable:** Create a permanent, dedicated funding stream for planting and maintaining trees in EJC's, making this a core service of the City.

Our SOMA West community is not asking for anything more than seeking fairness for our neighborhood's residents, small businesses, hoteliers, tech innovators, artists, non-profits, and multi-generational families that is consistent with the policy changes soundly emanating from your administration. We would welcome the opportunity to meet with you to discuss this proposal further and stand ready to partner in building a healthier, more equitable San Francisco for all.

Sincerely,

SOMA West Neighborhood Association

cc: Supervisor Matt Dorsey  
Supervisor Bilal Mahmood  
Supervisor Jackie Fielder  
Carla Short, Director of San Francisco Public Works

#### Sources

1. *SF advances 'One City Shelter Act' ordinance* - Local News Matters, July 31, 2025, <https://localnewsmatters.org/2025/07/31/sf-advances-one-city-shelter-act-ordinance/>
2. San Francisco Family Zoning Plan | SF Planning, accessed September 7, 2025, <https://sfplanning.org/sf-family-zoning-plan>
3. Concrete Over Canopy - How San Francisco Is Failing Its Environmental Justice Communities - Shaun Aukland, August 17, 2025, [sftrees.short.gy/equity](https://sftrees.short.gy/equity)
4. Air Pollutant Exposure Zone | DataSF, accessed September 7, 2025, <https://data.sfgov.org/Geographic-Locations-and-Boundaries/Air-Pollutant-Exposure-Zone/t65d-x6p8>
5. *6 Ways Urban Trees Benefit Our Climate and Health* - Conservation Law Foundation, August 4, 2023, <https://www.clf.org/blog/urban-trees-benefit-our-climate-and-health/>
6. SF Environmental Justice Communities Map: Technical Documentation | SF Planning, March 2023, [https://www.sf.gov/sites/default/files/2024-02/exhibitg\\_23\\_03\\_10\\_ejc\\_map\\_technical\\_documentation\\_trasmittal\\_w\\_app.pdf](https://www.sf.gov/sites/default/files/2024-02/exhibitg_23_03_10_ejc_map_technical_documentation_trasmittal_w_app.pdf)



September 23, 2025

Mayor Daniel Lurie  
City Hall, Room 200  
1 Dr. Carlton B. Goodlett Place  
San Francisco, CA 94102  
[daniel.lurie@sfgov.org](mailto:daniel.lurie@sfgov.org)

RE: San Francisco Urban Tree Canopy and Public Health

Dear Mayor Lurie,

We are writing to provide a summary of contemporary evidence on the impacts of the urban forest on human health. This effort is grounded in a robust body of scientific evidence, including research published in the *International Journal of Environmental Research and Public Health* (2020; 17:4371), which demonstrates the profound benefits of urban tree cover for public health and the urgent need to address disparities in access.

Urban tree canopies provide measurable improvements in physical and mental health. Trees reduce exposure to harmful air pollution, mitigate urban heat islands (i.e., a metropolitan area that is significantly warmer than its surrounding rural areas due to human activities, dense development, and materials like concrete and asphalt that absorb and retain heat, leading to higher temperatures), promote physical activity, and lower the risk of cardiovascular and respiratory disease. They also contribute to mental well-being by reducing stress, fostering social cohesion, and improving overall quality of life. These ecosystem services translate into substantial public-health gains and reduced healthcare costs, particularly as cities face the accelerating impacts of climate change.

Yet, as the research underscores, tree canopy is not equitably distributed. Wealthier neighborhoods typically benefit from significantly greater tree cover, while lower-

income communities—often with higher proportions of marginalized populations—experience more concrete, fewer green spaces, and the health burdens that result. This inequitable distribution exacerbates existing health disparities, leaving vulnerable communities disproportionately exposed to extreme heat, pollution, and related health risks.

Initiatives and efforts that directly address these inequities prioritize the restoration of tree canopy in under-resourced neighborhoods. Such investments in environmental sustainability are vital steps toward health equity and climate resilience.

By expanding tree canopy where it is most needed, cities can create healthier, more resilient, and more just urban communities.

Sincerely,

Arianne Teherani, PhD  
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Visitacion Valley Engage Green  
anne@visvalleygreenway.org  
www.visitacionvalleyengagegreen.com

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Dear Mayor Lurie and Supervisor Walton,

I am writing on behalf of Visitacion Valley Engage Green (VVEG) to express our enthusiastic and urgent support for the proposed Tree Equity Ordinance. For decades, our volunteer group and other neighborhood groups have worked to transform neglected public land into the Visitacion Valley Greenway, a vibrant community space for gardening, education, and the arts. We have seen firsthand how greening can build community and improve the lives of our residents. This ordinance represents a critical and long-overdue step to systemically address the environmental inequities that our neighborhood, and others like it, continue to face.

The need for this legislation in Visitacion Valley is undeniable. New data shows our neighborhood has a tree canopy cover of only 4.7%, which is less than half of the city-wide average of 12.8%. This is not merely an aesthetic issue, it is a matter of public health and justice. As a designated Environmental Justice Community, our residents are disproportionately burdened by environmental hazards that a healthy urban forest helps to mitigate. The fact that four of our five census tracts would qualify as "High Priority" for planting under the ordinance's data-driven methodology underscores the severity of this canopy gap.

This is not a new problem, nor is it a new goal for the city. For nearly two decades, San Francisco has acknowledged these inequities in its own planning documents. The 2006 Urban Forest Plan identified implementing "major tree planting programs targeting underserved neighborhoods in order to achieve greater environmental equity and accessibility" as a "highest, most immediate priority". The 2014 Urban Forest Plan again set a goal to "pursue an expanded and equitable distribution of trees". Yet, in the many years since these plans were published, the canopy gap has not closed. Good intentions and aspirational goals have not been enough. We need legislation that mandates a data-driven model to direct resources to the communities that have been historically overlooked, and this ordinance does exactly that.

For years, VVEG and our partners have worked tirelessly, patchworking together grants and volunteer hours to bring more green space to our community. This ordinance would provide the systemic support and city-wide commitment needed to truly make our neighborhoods whole.

We urge you to give this ordinance your full support and to champion its passage. It is a powerful tool to build a healthier, more resilient, and more equitable San Francisco for all.

Thank you for your leadership and your consideration.

Sincerely,

Anne Seeman  
Visitacion Valley Engage Green (VVEG)