

FILE NO: 200071

Petitions and Communications received from January 6, 2020, through January 20, 2020 for reference by the President to Committee considering related matters, or to be ordered filed by the Clerk on January 28, 2020.

Personal information that is provided in communications to the Board of Supervisors is subject to disclosure under the California Public Records Act and the San Francisco Sunshine Ordinance. Personal information will not be redacted.

From the office of the Mayor, pursuant to Charter, Section 3.100(18), making the following (re)appointments: Copy: Each Supervisor. (1)

Our City Our Home Oversight Committee

**Ken Reggio** - term ending April 22, 2022

**Lena Miller** - term ending April 22, 2022

**Brett Andrews** - term ending April 22, 2022

Fire Commission

**Katherine Feinstein** - term ending January 15, 2024

**Jose Anthony “Tony” Rodriguez Jr.** - term ending January 15, 2024

**Stephen Nakajo** - term ending January 15, 2024 (reappointment)

Human Rights Commission

**Irene Yee Riley** - term ending September 2, 2023

**Lyn-Tise Jones** - term ending September 2, 2023

From the Ethics Commission, pursuant to Charter, Section 15.102, submitting newly adopted regulations. Copy: Each Supervisor. (2)

From the Office of the City Attorney, pursuant to Charter, Section 13.103.5, making the following reappointment to the Elections Commission: Copy: Each Supervisor. (3)

**Roger Donaldson** – term ending January 1, 2025

From the Office of the Controller, City Services Auditor, submitting the field follow-up of the 2016 audit of the Human Services Agency’s Oversight of Arriba Juntos. Copy: Each Supervisor. (4)

From the Office of Economic and Workforce Development, pursuant to Administrative Code, Chapter 82.9(f), submitting the Annual Report for the San Francisco Local Hiring Policy for Construction. Copy: Each Supervisor. (5)

From the Office of the Treasurer and Tax Collector, pursuant to California State Government Code, Section 53646, submitting the CCSF Pooled Investment Report, December 2019. Copy: Each Supervisor. (6)

From the Office of the Controller, City Services Auditor, submitting the Evaluation of the Stay Over Program at Buena Vista Horace Mann School. Copy: Each Supervisor. (7)

From the Office of the Controller, City Services Auditor, submitting a report of the audit of the City and County of San Francisco's 2016 Public Health and Safety General Obligation Go Bond Program. Copy: Each Supervisor. (8)

From the President of the Board of Supervisors, calling for a special meeting of the Board of Supervisors on January 21, 2020, to discuss Planning Code, Zoning Map - Establishing 12 Named Neighborhood Commercial Districts. File No. 191260. Copy: Each Supervisor. (9)

From California Fish and Game Commission, submitting three notices of regulatory action. 3 letters. Copy: Each Supervisor. (10)

From Human Services Agency, pursuant to Resolution No. 460-19, submitting a report dated December 31, 2019. Copy: Each Supervisor. (11)

From Sue Vaughan, regarding Lime scooters being used by middle school students. Copy: Each Supervisor. (12)

From Aaron Goodman, regarding lack of protective gear for Department of Public Health employees who work at public facilities. Copy: Each Supervisor. (13)

From Aaron Goodman, regarding lane changes to deal with construction and delivery trucks. Copy: Each Supervisor. (14)

From concern citizen, regarding a new location for a permittee's medical cannabis dispensary permit. File No. 190973. Copy: Each Supervisor. (15)

From concerned citizens, regarding adopted Resolution for new, existing and revised designations of Priority Development Areas (PDA's). 2 letters. File No. 191120. Copy: Each Supervisor. (16)

From concerned citizens, regarding proposed changes to Golden Gate Park. 2 letters. Copy: Each Supervisor. (17)

From concerned citizens, regarding San Francisco Police Department staffing levels. 6 letters. Copy: Each Supervisor. (18)

From the California Public Utilities Commission, submitting notice of a project from Verizon Wireless. Copy: Each Supervisor. (19)

From concerned citizens, regarding the homeless crisis in San Francisco. 2 letters. Copy: Each Supervisor. (20)

From Jewish Family and Community Services, East Bay, regarding Resolution No. 004-20, supporting the resettlement of refugees within the City, and concurring in the Mayor's consent to accept refugees in the City under the United States Department of State's Reception and Replacement Program. File No. 191301. Copy: Each Supervisor. (21)

From Paul McGavin, My Street, My Choice, regarding setting a maximum effective radiated power pollution limit in San Francisco. Copy: Each Supervisor. (22)

From Allen Jones, regarding the closing of SF Juvenile Justice Center. Copy: Each Supervisor. (23)

**From:** [Mchugh, Eileen \(BOS\)](#)  
**To:** [BOS-Supervisors](#); [BOS-Legislative Aides](#); [BOS-Administrative Aides](#)  
**Cc:** [Calvillo, Angela \(BOS\)](#); [Somera, Alisa \(BOS\)](#); [Young, Victor \(BOS\)](#); [Karunaratne, Kanishka \(MYR\)](#); [PEARSON, ANNE \(CAT\)](#)  
**Subject:** TIME SENSITIVE: Mayoral Appointments - Our City Our Home Oversight Committee  
**Date:** Thursday, January 16, 2020 7:12:00 PM  
**Attachments:** [Clerk's Memo 1.16.20.pdf](#)  
[Andrews.pdf](#)  
[Reggio.pdf](#)  
[Miller.pdf](#)

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Hello,

The Office of the Mayor has submitted the attached appointment packages, pursuant to Charter, Section 3.100(18). Please see the attached memo from the Clerk of the Board for more information and instructions.

Thank you,

Eileen McHugh  
Executive Assistant  
Board of Supervisors  
1 Dr. Carlton B. Goodlett Place, City Hall, Room 244  
San Francisco, CA 94102-4689  
Phone: (415) 554-7703 | Fax: (415) 554-5163  
[eileen.e.mchugh@sfgov.org](mailto:eileen.e.mchugh@sfgov.org) | [www.sfbos.org](http://www.sfbos.org)

BOARD of SUPERVISORS



City Hall  
1 Dr. Carlton B. Goodlett Place, Room 244  
San Francisco 94102-4689  
Tel. No. 554-5184  
Fax No. 554-5163  
TDD/TTY No. 554-5227

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MEMORANDUM

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Date: January 16, 2020  
To: Members, Board of Supervisors  
From: *ACC* Angela Calvillo, Clerk of the Board  
Subject: Mayoral Appointments - Our City Our Home Oversight Committee

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On January 16, 2020, the Mayor submitted the following complete appointment packages pursuant to Charter, Section 3.100(18). Appointments in this category are effective immediately unless rejected by a two-thirds vote of the Board of Supervisors.

- **Ken Reggio** - term ending April 22, 2022
- **Lena Miller** - term ending April 22, 2022
- **Brett Andrews** - term ending April 22, 2022

Pursuant to Board Rule 2.18.3, a Supervisor may request a hearing on a Mayoral appointment by notifying the Clerk in writing.

Upon receipt of such notice, the Clerk shall refer the appointment to the Rules Committee so that the Board may consider the appointment and act within 30 days of the appointment as provided in Charter, Section 3.100(18).

If you are interested in requesting a hearing on any of these appointments, please notify me in writing by **12:00 p.m. on Wednesday, January 22, 2020.**

c: Hillary Ronen - Rules Committee Chair  
Alisa Somera - Legislative Deputy  
Victor Young - Rules Clerk  
Anne Pearson - Deputy City Attorney  
Kanishka Cheng - Mayor's Director of Commission Affairs

OFFICE OF THE MAYOR  
SAN FRANCISCO



LONDON N. BREED  
MAYOR

## Notice of Appointment

December 26, 2019

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

RECEIVED  
BOARD OF SUPERVISORS  
SAN FRANCISCO  
2020 JAN 16 PM 2:55  
BY [Signature]

Honorable Board of Supervisors:

Pursuant to Charter §3.100(18), of the City and County of San Francisco, I make the following appointment:

**Ken Reggio** to Seat 1 of the Our City Our Home Oversight Committee for a three year term ending April 22, 2022.

I am confident that Mr. Reggio will serve our community well. Attached are their qualifications to serve, which demonstrate how their appointment represents the communities of interest, neighborhoods and diverse populations of the City and County of San Francisco.

Should you have any question about this appointment, please contact my Director of Commission Affairs, Kanishka Karunaratne Cheng, at 415.554.6696.

A handwritten signature in blue ink that reads "London N. Breed".

London N. Breed  
Mayor

OFFICE OF THE MAYOR  
SAN FRANCISCO



LONDON N. BREED  
MAYOR

### Notice of Appointment

January 13, 2020

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

RECEIVED  
BOARD OF SUPERVISORS  
SAN FRANCISCO  
2020 JAN 16 PM 2:58  
WV

Honorable Board of Supervisors:

Pursuant to Charter §3.100(18), of the City and County of San Francisco, I make the following appointment:

**Lena Miller** to Seat 3 of the Our City Our Home Oversight Committee for a three year term ending April 22, 2022.

I am confident that Ms. Miller will serve our community well. Attached are their qualifications to serve, which demonstrate how their appointment represents the communities of interest, neighborhoods and diverse populations of the City and County of San Francisco.

Should you have any question about this appointment, please contact my Director of Commission Affairs, Kanishka Karunaratne Cheng, at 415.554.6696.

A handwritten signature in blue ink that reads "London Breed".

London N. Breed  
Mayor

OFFICE OF THE MAYOR  
SAN FRANCISCO



LONDON N. BREED  
MAYOR

## Notice of Appointment

January 13, 2020

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



Honorable Board of Supervisors:

Pursuant to Charter §3.100(18), of the City and County of San Francisco, I make the following appointment:

**Brett Andrews** to Seat 5 of the Our City Our Home Oversight Committee for a three year term ending April 22, 2022.

I am confident that Mr. Andrews will serve our community well. Attached are their qualifications to serve, which demonstrate how their appointment represents the communities of interest, neighborhoods and diverse populations of the City and County of San Francisco.

Should you have any question about this appointment, please contact my Director of Commission Affairs, Kanishka Karunaratne Cheng, at 415.554.6696.

A handwritten signature in blue ink that reads "London Breed".

London N. Breed  
Mayor

**From:** [Mchugh, Eileen \(BOS\)](#)  
**To:** [BOS-Supervisors](#); [BOS-Legislative Aides](#); [BOS-Administrative Aides](#)  
**Cc:** [Calvillo, Angela \(BOS\)](#); [Somera, Alisa \(BOS\)](#); [Young, Victor \(BOS\)](#); [PEARSON, ANNE \(CAT\)](#); [Karunaratne, Kanishka \(MYR\)](#); [Peacock, Rebecca \(MYR\)](#)  
**Subject:** TIME SENSITIVE: Mayoral (Re)appointments - Fire Commission  
**Date:** Wednesday, January 15, 2020 3:26:00 PM  
**Attachments:** [Clerk's Memo 1.15.20.pdf](#)  
[Feinstein.pdf](#)  
[Rodriguez.pdf](#)  
[Nakajo.pdf](#)

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Hello,

The Office of the Mayor has submitted the attached complete (re)appointment packages pursuant to Charter, Section 3.100(18). Please see the memo from the Clerk of the Board for more information and instructions.

Thank you,

Eileen McHugh  
Executive Assistant  
Board of Supervisors  
1 Dr. Carlton B. Goodlett Place, City Hall, Room 244  
San Francisco, CA 94102-4689  
Phone: (415) 554-7703 | Fax: (415) 554-5163  
[eileen.e.mchugh@sfgov.org](mailto:eileen.e.mchugh@sfgov.org) | [www.sfbos.org](http://www.sfbos.org)

BOARD of SUPERVISORS



City Hall  
1 Dr. Carlton B. Goodlett Place, Room 244  
San Francisco 94102-4689  
Tel. No. 554-5184  
Fax No. 554-5163  
TDD/TTY No. 554-5227

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MEMORANDUM

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Date: January 15, 2020  
To: Members, Board of Supervisors  
From: *ACC* Angela Calvillo, Clerk of the Board  
Subject: Mayoral (Re)appointments - Fire Commission

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On January 15, 2020, the Mayor submitted the following complete (re)appointment packages pursuant to Charter, Section 3.100(18). Appointments in this category are effective immediately unless rejected by a two-thirds vote of the Board of Supervisors.

- **Katherine Feinstein** - term ending January 15, 2024
- **Jose Anthony "Tony" Rodriguez Jr.** - term ending January 15, 2024
- **Stephen Nakajo** - term ending January 15, 2024 (reappointment)

Pursuant to Board Rule 2.18.3, a Supervisor may request a hearing on a Mayoral appointment by notifying the Clerk in writing.

Upon receipt of such notice, the Clerk shall refer the appointment to the Rules Committee so that the Board may consider the appointment and act within 30 days of the appointment as provided in Charter, Section 3.100(18).

If you are interested in requesting a hearing on any of these (re)appointments, please notify me in writing by **12:00 p.m. on Wednesday, January 22, 2020.**

c: Hillary Ronen - Rules Committee Chair  
Alisa Somera - Legislative Deputy  
Victor Young - Rules Clerk  
Anne Pearson - Deputy City Attorney  
Kanishka Cheng - Mayor's Director of Commission Affairs

OFFICE OF THE MAYOR  
SAN FRANCISCO



LONDON N. BREED  
MAYOR

### Notice of Appointment

January 15, 2020

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

RECEIVED  
BOARD OF SUPERVISORS  
SAN FRANCISCO  
2020 JAN 15 PM 3:10  
BY [Signature]

Honorable Board of Supervisors:

Pursuant to Charter Section 3.100(18), of the City and County of San Francisco, I make the following appointment:

**Katherine Feinstein** to the Fire Commission fulfilling the term ending January 15, 2024, to the seat formerly held by Joe Alioto Veronese.

I am confident that Ms. Feinstein will serve our community well. Attached are their qualifications to serve, which demonstrate how their appointment represents the communities of interest, neighborhoods and diverse populations of the City and County of San Francisco.

Should you have any question about this appointment, please contact my Director of Commission Affairs, Kanishka Karunaratne Cheng, at 415.554.6696

A handwritten signature in blue ink that reads "London Breed".

London N. Breed  
Mayor, City and County of San Francisco

OFFICE OF THE MAYOR  
SAN FRANCISCO



LONDON N. BREED  
MAYOR

### Notice of Appointment

January 15, 2020

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

RECEIVED  
BOARD OF SUPERVISORS  
SAN FRANCISCO  
2020 JAN 15 PM 2:32

Honorable Board of Supervisors:

Pursuant to Charter Section 3.100(18), of the City and County of San Francisco, I make the following appointment:

**Jose Anthony "Tony" Rodriguez Jr.** to the Fire Commission for a four year term ending January 15, 2024, replacing Michael Hardeman.

I am confident that Mr. Rodriguez will serve our community well. Attached are their qualifications to serve, which demonstrate how their appointment represents the communities of interest, neighborhoods and diverse populations of the City and County of San Francisco.

Should you have any question about this appointment, please contact my Director of Commission Affairs, Kanishka Karunaratne Cheng, at 415.554.6696

A handwritten signature in blue ink that reads "London Breed".

London N. Breed  
Mayor, City and County of San Francisco

OFFICE OF THE MAYOR  
SAN FRANCISCO



LONDON N. BREED  
MAYOR

## Notice of Reappointment

January 15, 2020

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

RECEIVED  
BOARD OF SUPERVISORS  
SAN FRANCISCO  
2020 JAN 15 PM 2:32  
W

Honorable Board of Supervisors:

Pursuant to Charter Section 3.100(18), of the City and County of San Francisco, I make the following reappointment:

**Stephen Nakajo** to the Fire Commission for a four year term ending January 15, 2024.

I am confident that Mr. Nakajo will serve our community well. Attached are their qualifications to serve, which demonstrate how their appointment represents the communities of interest, neighborhoods and diverse populations of the City and County of San Francisco.

Should you have any question about this appointment, please contact my Director of Commission Affairs, Kanishka Karunaratne Cheng, at 415.554.6696

A handwritten signature in blue ink, appearing to read "London N. Breed".

London N. Breed  
Mayor, City and County of San Francisco

**From:** [Mchugh, Eileen \(BOS\)](#)  
**To:** [BOS-Supervisors](#); [BOS-Legislative Aides](#); [BOS-Administrative Aides](#)  
**Cc:** [Calvillo, Angela \(BOS\)](#); [Somera, Alisa \(BOS\)](#); [Young, Victor \(BOS\)](#); [BOS Legislation, \(BOS\)](#); [PEARSON, ANNE \(CAT\)](#); [Karunaratne, Kanishka \(MYR\)](#); [Peacock, Rebecca \(MYR\)](#)  
**Subject:** TIME SENSITIVE: Mayoral Appointments - Human Rights Commission  
**Date:** Tuesday, January 14, 2020 6:35:00 PM  
**Attachments:** [Clerk's Memo 1.14.20.pdf](#)  
[Riley.pdf](#)  
[Jones.pdf](#)

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Hello,

The Office of the Mayor has submitted the attached complete appointment packages, pursuant to Charter, Section 3.100(18). Please see the memo from the Clerk of the Board for more information and instructions.

Thank you,

Eileen McHugh  
Executive Assistant  
Board of Supervisors  
1 Dr. Carlton B. Goodlett Place, City Hall, Room 244  
San Francisco, CA 94102-4689  
Phone: (415) 554-7703 | Fax: (415) 554-5163  
[eileen.e.mchugh@sfgov.org](mailto:eileen.e.mchugh@sfgov.org) | [www.sfbos.org](http://www.sfbos.org)

BOARD of SUPERVISORS



City Hall  
1 Dr. Carlton B. Goodlett Place, Room 244  
San Francisco 94102-4689  
Tel. No. 554-5184  
Fax No. 554-5163  
TDD/TTY No. 554-5227

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MEMORANDUM

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Date: January 14, 2020  
To: Members, Board of Supervisors  
From: *ACC* Angela Calvillo, Clerk of the Board  
Subject: Mayoral Appointments - Human Rights Commission

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On January 14, 2020, the Mayor submitted the following complete appointment packages pursuant to Charter, Section 3.100(18). Appointments in this category are effective immediately unless rejected by a two-thirds vote of the Board of Supervisors.

- Irene Yee Riley - term ending September 2, 2023
- Lyn-Tise Jones - term ending September 2, 2023

Pursuant to Board Rule 2.18.3, a Supervisor may request a hearing on a Mayoral appointment by notifying the Clerk in writing.

Upon receipt of such notice, the Clerk shall refer the appointment to the Rules Committee so that the Board may consider the appointment and act within 30 days of the appointment as provided in Charter, Section 3.100(18).

If you are interested in requesting a hearing on either of these appointments, please notify me in writing by **12:00 p.m. on Wednesday, January 22, 2020.**

c: Hillary Ronen - Rules Committee Chair  
Alisa Somera - Legislative Deputy  
Victor Young - Rules Clerk  
Anne Pearson - Deputy City Attorney  
Kanishka Cheng - Mayor's Director of Commission Affairs

OFFICE OF THE MAYOR  
SAN FRANCISCO



LONDON N. BREED  
MAYOR

### Notice of Appointment

January 13, 2020

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

Honorable Board of Supervisors:

Pursuant to Charter Section 3.100(18), of the City and County of San Francisco, I make the following appointment:

**Irene Yee Riley** to the Human Rights Commission for a four year term ending September 2, 2023, succeeding Maya Karwande.

I am confident that Ms. Riley will serve our community well. Attached are their qualifications to serve, which demonstrate how their appointment represents the communities of interest, neighborhoods and diverse populations of the City and County of San Francisco.

Should you have any question about this appointment, please contact my Director of Commission Affairs, Kanishka Karunaratne Cheng, at 415.554.6696

Sincerely,

A handwritten signature in blue ink that reads "London Breed".

London N. Breed  
Mayor, City and County of San Francisco

RECEIVED  
BOARD OF SUPERVISORS  
SAN FRANCISCO  
2020 JAN 14 PM 4:47  
OK

OFFICE OF THE MAYOR  
SAN FRANCISCO



LONDON N. BREED  
MAYOR

### Notice of Appointment

January 13, 2020

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

RECEIVED  
BOARD OF SUPERVISORS  
SAN FRANCISCO  
2020 JAN 14 PM 4:47  
EW

Honorable Board of Supervisors:

Pursuant to Charter Section 3.100(18), of the City and County of San Francisco, I make the following appointment:

**Lyn-Tise Jones** to the Human Rights Commission for a four year term ending September 2, 2023, succeeding Susan Christian.

I am confident that Ms. Jones will serve our community well. Attached are their qualifications to serve, which demonstrate how their appointment represents the communities of interest, neighborhoods and diverse populations of the City and County of San Francisco.

Should you have any question about this appointment, please contact my Director of Commission Affairs, Kanishka Karunaratne Cheng, at 415.554.6696

Sincerely,

A handwritten signature in blue ink that reads "London Breed".

London N. Breed  
Mayor, City and County of San Francisco

**From:** [Mchugh, Eileen \(BOS\)](#)  
**To:** [BOS-Supervisors](#); [BOS-Legislative Aides](#); [BOS-Administrative Aides](#)  
**Cc:** [Calvillo, Angela \(BOS\)](#); [Somera, Alisa \(BOS\)](#); [PEARSON, ANNE \(CAT\)](#)  
**Subject:** TIME SENSITIVE: Ethics Regulations Approved  
**Date:** Friday, January 17, 2020 6:04:00 PM  
**Attachments:** [Clerk's Memo 1.17.20.pdf](#)  
[ETH Regulations Transmittal Letter \(E-Filing\) 1.17.2020.pdf](#)  
[Ethics E-Filing Regulations \(Clean\).pdf](#)  
[Ethics E-Filing Regulations \(Redline\).pdf](#)  
[Ethics Form 700 E-Filing Regulations MEMO.pdf](#)

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Hello,

The Office of the Clerk of the Board is in receipt of the attached recently approved regulations from the Ethics Commission, pursuant to Charter, Section 15.102 . Please see the attached memo from the Clerk of the Board for more information and instructions.

Thank you,

Eileen McHugh  
Executive Assistant  
Board of Supervisors  
1 Dr. Carlton B. Goodlett Place, City Hall, Room 244  
San Francisco, CA 94102-4689  
Phone: (415) 554-7703 | Fax: (415) 554-5163  
[eileen.e.mchugh@sfgov.org](mailto:eileen.e.mchugh@sfgov.org) | [www.sfbos.org](http://www.sfbos.org)

BOARD of SUPERVISORS



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San Francisco 94102-4689  
Tel. No. 554-5184  
Fax No. 554-5163  
TDD/TTY No. 544-5227

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MEMORANDUM

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Date: January 17, 2020  
To: Members, Board of Supervisors  
From:  Angela Calvillo, Clerk of the Board  
Subject: Recently Approved Regulations by the Ethics Commission

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At its regular meeting on January 17, 2019, the Ethics Commission adopted new regulations. Per the requirements of Charter, Sec. 15.102, the Commission is required to transmit to the Board of Supervisors regulations it adopts within 24 hours of their adoption. The Commission adopted regulations to:

1. Require that City employees required to file the Form 700 Statement of Economic Interests do so in electronic format using the Ethics Commission's online disclosure system beginning January 1, 2021; and
2. Create processes for implementing and administering the electronic filing of the Form 700 by City employees.

The San Francisco Charter, Section 15.102, provides that a regulation adopted by the Ethics Commission shall become effective 60 days after the date of its adoption unless before the expiration of this 60-day period, **March 17, 2020**, two-thirds of all members (eight votes) of the Board of Supervisors vote to disapprove the rule or regulation.

If you wish to hold a hearing on any of these matters, please notify me in writing by **5:00pm, Friday, January 31, 2020.**

c: Alisa Somera - Legislative Deputy  
Patrick Ford - Senior Policy Analyst  
Anne Pearson - Deputy City Attorney



# ETHICS COMMISSION CITY AND COUNTY OF SAN FRANCISCO

DAINA CHIU  
CHAIR

NOREEN AMBROSE  
VICE-CHAIR

YVONNE LEE  
COMMISSIONER

FERN M. SMITH  
COMMISSIONER

LATEEF H. GRAY  
COMMISSIONER

LEEANN PELHAM  
EXECUTIVE DIRECTOR

January 17, 2020

Honorable Members  
San Francisco Board of Supervisors  
Attention: Angela Calvillo  
Clerk of the Board of Supervisors  
City Hall, Room 244  
1 Dr. Carlton B. Goodlett Place  
San Francisco, CA 94102

**Re: Ethics Commission Approved Regulations**

Dear Members of the Board:

Charter Sec. 15.102, in part, provides that a regulation adopted by the Ethics Commission “shall become effective 60 days after the date of its adoption unless before the expiration of this 60-day period two-thirds of all members of the Board of Supervisors vote to veto the rule or regulation.” This letter transmits regulations adopted by the Ethics Commission at its meeting on Friday, January 17, 2020. The regulations do the following:

1. Require that City employees required to file the Form 700 Statement of Economic Interests do so in electronic format using the Ethics Commission’s online disclosure system beginning January 1, 2021; and
2. Create processes for implementing and administering the electronic filing of the Form 700 by City employees.

The regulations were developed with public input and review, including opportunities to provide feedback at the Ethics Commission’s regularly scheduled January meeting.

If you have any questions about the attached regulations, please feel free to contact Senior Policy and Legislative Affairs Counsel Patrick Ford or me at (415) 252-3100.

Sincerely,  
*LeeAnn Pelham*  
LeeAnn Pelham  
Executive Director

Attachments

**Proposed Amendments to Regulations Supporting Campaign and Governmental Conduct Code  
Section 3.1-100 et seq**

**Regulation 3.1-102-1**

Effective January 1, 2021, all persons identified in Sections 3.1-103(d) or 3.1-108 of the Campaign and Governmental Conduct Code shall file assuming office, annual, and leaving office Form 700 Statements of Economic Interests in an electronic format prescribed by the Ethics Commission. The Ethics Commission is not the filing officer for such persons. The person's department head or the executive director of the person's agency is the filing officer for such persons.

**Regulation 3.1-103-1**

All persons listed in Section 3.1-103(a) and (b) of the Campaign and Governmental Conduct Code shall file assuming office, annual, and leaving office Form 700 Statements of Economic Interests with the Ethics Commission in an electronic format prescribed by the Ethics Commission. The Ethics Commission is the filing officer for such persons.

**Regulation 3.1-103-2**

(a) Any person required to file the Form 700 Statement of Economic Interest in electronic format shall provide the following to that person's filing officer or that filing officer's designee:

1. A current and unique City, County, State of California, Federal, or other local government agency email address;
2. The name of the filer's agency, department, or a current business mailing address;
3. A current and active daytime telephone number, which may be a work number;
4. Any other information required by the Ethics Commission consistent with the purposes and provisions of Article III, Chapter 1 of the Campaign and Governmental Conduct Code.

(b) For any person identified in Sections 3.1-103(d) or 3.1-108 of the Campaign and Governmental Conduct Code, the person's filing officer must notify the person of the requirements of subsections (a) and (c) of this regulation within 5 calendar days of the person assuming office.

(c) Any person required to file the Form 700 in electronic format must provide the information required in subsection (a) of this regulation to the person's filing officer within 15 calendar days of the person assuming office. If an email address is not provided to the filer by the filer's government agency within 15 calendar days of assuming office, the filer shall provide the filing officer with a personal email address for the purposes of filing the Form 700 until the filer has been provided with an email address by the filer's government agency. A filer shall inform their filing officer within 15 calendar days whenever a change is made to the information required in subsection (a). For all persons identified in Sections 3.1-103(d) or 3.1-108 of the Campaign and Governmental Conduct Code, the requirements of subsections (a)–(c) of this regulation become effective September 1, 2020. Any person identified in Sections 3.1-103(d) or 3.1-108 of the Campaign and Governmental Conduct Code who assumed office prior to

September 1, 2020 shall provide the information required in subsection (a) of this regulation to the person's filing officer upon request.

(d) Within 5 calendar days of the receipt of the information provided by a filer under subsection (a), a filing officer shall use the information to create an electronic filing account for the filer in the electronic filing system designated by the Ethics Commission and shall provide the filer with the information necessary to access the account. The requirements of this subsection (d) shall become effective January 1, 2021.

**Regulation 3.1-103-3**

A person required to file a Form 700 Statement of Economic Interests in electronic format may make a written request to the Executive Director of the Ethics Commission to seek permission to file an original paper copy instead of filing in electronic format. The person must submit the request at least 15 calendar days prior to the deadline for filing the Form 700 Statement of Economic Interests, and the request must provide the compelling reasons why the request should be granted. The Executive Director may grant or deny the request in his or her discretion.

**Proposed Amendments to Regulations Supporting Campaign and Governmental Conduct Code  
Section 3.1-100 et seq**

**Regulation 3.1-102-1**

Effective January 1, 2021, all persons identified in Sections 3.1-103(d) or 3.1-108 of the Campaign and Governmental Conduct Code shall file assuming office, annual, and leaving office Form 700 Statements of Economic Interests in an electronic format prescribed by the Ethics Commission. The Ethics Commission is not the filing officer for such persons. The person's department head or the executive director of the person's agency is the filing officer for such persons.

**Regulation 3.1-103-1**

Effective January 1, 2014, all persons listed in Section 3.1-103(a) and (b) of the Campaign and Governmental Conduct Code shall file assuming office, annual, and leaving office Form 700 Statements of Economic Interests with the Ethics Commission in an electronic format prescribed by the Ethics Commission. The Ethics Commission is the filing officer for such persons.

**Regulation 3.1-103-2**

(a) Any person required to file the Form 700 Statement of Economic Interest in electronic format shall provide the following to the Ethics Commission that person's filing officer or that filing officer's designee:

1. A current and unique City, County, State of California, Federal, or other local government agency email address;
2. The name of the filer's agency, department, or a current business mailing address;
3. A current and active daytime telephone number, which may be a work number;
4. Any other information required by the Ethics Commission consistent with the purposes and provisions of Article III, Chapter 1 of the Conflict of Interest Campaign and Governmental Conduct Code.

Information required in (1) (4) above must be provided to the Ethics Commission by the filer or his or her Filing Officer within 15 days of the filer assuming office. If an email address is not provided to the filer by the filer's government agency within 15 days of assuming office, the filer or his or her Filing Officer shall, within 30 days of assuming office, notify the Ethics Commission and the department head of the filer's agency. A filer shall inform their Filing Officer and the Ethics Commission within 15 calendar days whenever a change is made to the information required above.

(b) For any person identified in Sections 3.1-103(d) or 3.1-108 of the Campaign and Governmental Conduct Code, the person's filing officer must notify the person of the requirements of subsections (a) and (c) of this regulation within 5 calendar days of the person assuming office.

(c) Any person required to file the Form 700 in electronic format must provide the information required in subsection (a) of this regulation to the person's filing officer within 15 calendar days of the person assuming office. If an email address is not provided to the filer by the filer's government agency within

15 calendar days of assuming office, the filer shall provide the filing officer with a personal email address for the purposes of filing the Form 700 until the filer has been provided with an email address by the filer's government agency. A filer shall inform their filing officer within 15 calendar days whenever a change is made to the information required in subsection (a). For all persons identified in Sections 3.1-103(d) or 3.1-108 of the Campaign and Governmental Conduct Code, the requirements of subsections (a)–(c) of this regulation become effective September 1, 2020. Any person identified in Sections 3.1-103(d) or 3.1-108 of the Campaign and Governmental Conduct Code who assumed office prior to September 1, 2020 shall provide the information required in subsection (a) of this regulation to the person's filing officer upon request.

(d) Within 5 calendar days of the receipt of the information provided by a filer under subsection (a), a filing officer shall use the information to create an electronic filing account for the filer in the electronic filing system designated by the Ethics Commission and shall provide the filer with the information necessary to access the account. The requirements of this subsection (d) shall become effective January 1, 2021.

### **Regulation 3.1-103-3**

A person required to file a Form 700 Statements of Economic Interests in electronic format may make a written request to the Executive Director of the Ethics Commission to seek permission to file an original paper copy instead of filing in electronic format. The person must submit the request at least 15 calendar days prior to the deadline for filing the Form 700 Statement of Economic Interests, and the request must provide the compelling reasons why the request should be granted. The Executive Director may grant or deny the request in his or her discretion.



# ETHICS COMMISSION

## CITY AND COUNTY OF SAN FRANCISCO

DAINA CHIU  
CHAIR

NOREEN AMBROSE  
VICE-CHAIR

YVONNE LEE  
COMMISSIONER

FERN M. SMITH  
COMMISSIONER

LATEEF H. GRAY  
COMMISSIONER

LEEANN PELHAM  
EXECUTIVE DIRECTOR

Date: January 13, 2020

To: Members of the Ethics Commission

From: Pat Ford, Senior Policy and Legislative Affairs Counsel

Re: **AGENDA ITEM 7 – Discussion and Possible Action on Proposed Amendments to Regulations Related to Article III, Chapter 1 of the Campaign and Governmental Conduct Code**

---

**Summary:** This memo presents a proposed set of amendments to the regulations supporting the Campaign and Governmental Conduct Code (Attachment 1). These amendments would institute universal electronic filing of the Form 700 Statement of Economic Interests and would establish procedures for the administration of electronic filing systems.

**Action Requested:** That the Commission discuss and approve the proposed amendments.

Attached to this memorandum as Attachment 1 is a set of proposed amendments to the regulations supporting Article III, Chapter I of the Campaign and Governmental Conduct Code. Section I explains the purpose of the regulation amendments, which is to mandate that all City employees who are required to file the Form 700 Statement of Economic Interests do so in an electronic format prescribed by the Commission. Section II summarizes the separate amendments contained in Attachment 1.

A public notice announcing the potential regulation amendments was published on January 7<sup>th</sup>. This satisfies the ten-day notice requirement for proposed regulations contained in Charter section 4.104. Additionally, Staff have met and conferred with employee bargaining units regarding the impacts of electronic filing on City employees. This process was concluded on November 22, 2019. The Commission is therefore able to approve the amendments at the present meeting if it so chooses.

### I. Form 700 Statement of Economic Interests – Electronic Filing Project

#### A. Background

The Form 700 Statement of Economic Interests is a form promulgated by the California Fair Political Practices Commission that is used to publicly disclose personal financial interests of the filer, including income, investments, real estate, and gifts. All elected officials, board and commission members, department heads, and certain designated employees of the City must

file the Form 700 once upon assuming office, once annually, and once upon leaving office.<sup>1</sup> The primary purposes of disclosing personal financial interests are (1) to prevent any potential conflicts of interest from arising, and (2) to ensure that any conflicts of interest that do arise are known to regulators and to the public.

B. Electronic Filing

Under current regulations, elected officials, board and commission members, and department heads must file the Form 700 electronically using the Commission’s NetFile system.<sup>2</sup> To enable this, filers are provided with a NetFile user account. An electronic filer submits the Form 700 by logging into NetFile, entering the required information into the online interface, and clicking “submit.”

On the other hand, City employees who are required to file the Form 700 do so using a paper form that is filed with the filers’ departments. Employee filers must either print a hard copy of the Form 700 and fill it out by hand, or they must use their computers to enter their information into a PDF version of the form and then print the form out. Once the employee signs the paper form, he or she must submit it to the department’s designated filing officer. Filing officers must keep track of all employee filers in their respective departments, remind those filers to submit the form, keep track of which filers have filed the form, and report any non-filers to the Ethics Commission. Filing officers must also archive all employee filings so that they can be produced in response to a public record request.

Electronic filing has many advantages over paper filing. First, the information disclosed on an electronically filed form is much more readily accessible to the public; electronic filing allows data to be fed directly into an online database that can be easily filtered, searched, and downloaded. Paper forms that are on file with departments are only accessible by requesting the form from the filer’s department. This makes it impracticable to perform extensive searches of filings. Secondly, the filing experience is easier and faster for electronic filers. NetFile is more flexible than a paper form, allowing filers to add additional pages where necessary. NetFile also remembers prior submissions, which allows annual filers to simply review the prior year’s filing, make edits for any changes that occurred during the last year, and resubmit. Third, once implemented, electronic filing will be more streamlined and easier to administer Citywide than the current paper-based system. Filing officers will have fewer manual tasks to perform, and it will be easier to track filing deadlines and compliance rates. Electronic filing is also more environmentally friendly by reducing the City’s overall use of paper.

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<sup>1</sup> California law requires certain local officials (and any candidate for such offices) to file the Form 700. These officials are the Mayor, members of the Board of Supervisors, Treasurer, City Attorney, District Attorney, City Administrator, and members of the Planning Commission. Cal. Gov. Code §§ 87200, 87201 (2020). Additionally, California law requires that local jurisdictions identify any additional offices or positions “which involve the making or participation in the making of decisions which may foreseeably have a material effect on any financial interest” and require those individuals to file the Form 700 as well. Cal. Gov. Code § 87302(a) (2020).

<sup>2</sup> Campaign and Governmental Conduct Code Regulation 3.1-103-1.

Electronic filing is becoming the trend for Form 700 filing throughout the state. Forty-two of California’s fifty-eight counties have been approved by the state to use an electronic filing system for the Form 700, as have 132 cities, which include many of the larger municipalities in the state.<sup>3</sup>

Since 2014, San Francisco has mandated electronic filing of the Form 700 for elected officials, board and commission members, and department heads, of which there are roughly 500. The shift to electronic filing for this subset of filers has improved the availability of the disclosures and has made the filing process easier. At this time, Staff urges the Commission to approve the attached regulations, which would require City employees who must file the Form 700 to begin using the same electronic filing system that is in use by officials and department heads. Moving employee filers, of which there are roughly 3,500, to electronic filing will create a single, standardized filing process for City officials and employees and will maximize the benefits discussed above.

## II. Summary of Regulation Amendments

Table II.A below summarizes the separate regulation amendments contained in Attachment 1 and explains the role each amendment would play in the implementation of universal electronic filing.

**Table II.A – Form 700 E-Filing – Summary of Implementing Regulations**

Number	Type	Purpose
3.1-102-1	New	<p>This regulation would mandate that all City employees and consultants who are required by the Campaign and Governmental Conduct Code to file the Form 700 must file the form electronically. Staff would clarify through guidance materials that the electronic filing must be completed using the Commission’s NetFile system. This subsection contains an operative date of January 1, 2021, meaning that any Form 700 filing made after that date must be submitted through NetFile. Until that time, current paper filers will continue to file in paper form.</p> <p>The regulation also clarifies that, although employee filers will no longer be submitting paper forms to their department’s filing officer, the filing officer will still be an individual in the employee’s department (and the Ethics Commission will not become the employee’s filing officer). This is relevant to other regulations, which explain the duties of the filing officer in regards to setting up electronic filer accounts.</p>
3.1-103-1	Update	<p>This existing regulation requires electronic filing for all elected officers, board and commission members, and department heads. The amendment would remove the effective date, which was January 1, 2014, and would clarify that the Ethics Commission will continue to be the filing officer for this group of filers.</p>

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<sup>3</sup> See Fair Political Practices Commission, Form 700 Electronic Filing for an Agency's Internal Filers, *available at* <http://www.fppc.ca.gov/learn/guidance-for-filing-officers-/form-700-electronic-filing.html>.

3.1-103-2(a)	Update	This existing regulation requires all electronic filers to provide the contact information necessary to set up the filer’s electronic filing account in NetFile. The amendment clarifies that filers must provide this information to their filing officer. The filing officer may or may not be the Ethics Commission, depending on to which category the filer belongs (see Regulations 3.1-102-1 and 3.1-103-1 above).
3.1-103-2(b)	New	This language would require filing officers to notify any new filer within the filing officer’s pool of filers that the filer needs to provide contact information so that an electronic filing account may be set up for the filer. This notice would have to be given within five days of the new filer beginning work for the City.
3.1-103-2(c)	Update	This language, a version of which already exists in Regulation 3.1-103-2, specifies the deadline for new filers to provide contact information necessary to set up an electronic filing account. This subsection also includes an operative date for subsections (a) through (c) of September 1, 2020. This operative date means that filers will not need to begin providing contact information to their filing officers until later this year. That will allow Staff several months to create guidance materials and prepare filing officers for the new system. The regulation also distinguishes between employees who began work prior to September 1, 2020 (for whom contact information will already be available in NetFile at that time) and employees who will begin work after that date (for whom contact information will need to be collected on an ongoing basis).
3.1-103-2(d)	New	<p>This language would require filing officers to use the contact information received from filers to create NetFile accounts for the filers. The deadline for this task would be five days after receiving the information from the filer. The deadlines in subsections (a) through (c) are designed to result in the creation of an electronic filing account for each filer within twenty days of the filer beginning work. This would grant the filer at least ten days to then file the form before the deadline, which is thirty days after beginning work.</p> <p>This subsection contains an operative date of January 1, 2021 because filing officers will not need to create any filer accounts until after that time. Until January 1, 2021, Commission Staff will create filer accounts for all filers who are currently working for the City at that time.</p>
3.1-103-3	Update	This existing regulation creates a process for filers to request a waiver from the electronic filing requirement. The amendment fixes a typo in the text of the regulation.

**From:** [Mchugh, Eileen \(BOS\)](#)  
**To:** [BOS-Supervisors](#); [BOS-Legislative Aides](#); [BOS-Administrative Aides](#)  
**Cc:** [Calvillo, Angela \(BOS\)](#); [Somera, Alisa \(BOS\)](#); [Young, Victor \(BOS\)](#)  
**Subject:** FW: Reappointment of Roger Donaldson to the Elections Commission  
**Date:** Thursday, January 9, 2020 5:26:00 PM  
**Attachments:** [donaldson.pdf](#)

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Hello Supervisors,

Please see the attached memo from City Attorney, Dennis Herrera, reappointing Roger Donaldson to the Elections Commission, pursuant to Charter, Section 13.103.5.

Thank you,

Eileen McHugh  
Executive Assistant  
Board of Supervisors  
1 Dr. Carlton B. Goodlett Place, City Hall, Room 244  
San Francisco, CA 94102-4689  
Phone: (415) 554-7703 | Fax: (415) 554-5163  
[eileen.e.mchugh@sfgov.org](mailto:eileen.e.mchugh@sfgov.org) | [www.sfbos.org](http://www.sfbos.org)

---

**From:** Shen, Andrew (CAT) <Andrew.Shen@sfcityatty.org>  
**Sent:** Wednesday, January 8, 2020 3:30 PM  
**To:** Arntz, John (REG) <john.arntz@sfgov.org>; Donaldson, Roger (REG) <roger.donaldson@sfgov.org>  
**Cc:** Karunaratne, Kanishka (MYR) <kanishka.cheng@sfgov.org>; Raju, Manohar (PDR) <manohar.raju@sfgov.org>; Burke, Robyn (DAT) <robyn.burke@sfgov.org>; Cisneros, Jose (TTX) <jose.cisneros@sfgov.org>; 'cascoe@sfusd.edu' <cascoe@sfusd.edu>; Calvillo, Angela (BOS) <angela.calvillo@sfgov.org>; Rea, Diane (ADM) <diane.rea@sfgov.org>; MALDONADO, JENICA (CAT) <Jenica.Maldonado@sfcityatty.org>  
**Subject:** Reappointment of Roger Donaldson to the Elections Commission

Dear Director Arntz and Commissioner Donaldson,

Pursuant to the attached letter, City Attorney Dennis Herrera has reappointed Roger Donaldson for a five-year term on the San Francisco Elections Commission, to expire on January 1, 2025.

Thank you.

**Andrew Shen**  
Deputy City Attorney

Office of City Attorney Dennis Herrera  
(415) 554-4780  
[www.sfcityattorney.org](http://www.sfcityattorney.org)  
Find us on: [Facebook](#) [Twitter](#) [Instagram](#)

CITY AND COUNTY OF SAN FRANCISCO

OFFICE OF THE CITY ATTORNEY



DENNIS J. HERRERA  
City Attorney

DIRECT DIAL: (415) 554-4748  
E-MAIL: brittany.feitelberg@sfcityattly.org

January 2, 2020

John Arntz  
Director  
San Francisco Department of Elections  
City Hall, Room 48  
San Francisco, CA 94102

Re: Appointment of Roger Donaldson to the San Francisco Elections Commission

Dear Director Arntz:

Today, under Charter Section 13.103.5, I re-appointed Roger Donaldson to serve a full five-year term as a member of the San Francisco Elections Commission. As required by the Charter, Mr. Donaldson has a background in elections law. Mr. Donaldson's term will expire on January 1, 2025.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Herrera", written over a circular stamp or seal.

Dennis J. Herrera  
City Attorney

cc: Mayor London M. Breed  
Public Defender Manohar Raju  
District Attorney Suzy Loftus  
Treasurer Jose Cisneros  
Executive Assistant to the SFUSD Board of Education, Esther Casco  
Clerk to the Board of Supervisors, Angela Calvillo  
County Clerk, Diane Rea

**From:** [Reports, Controller \(CON\)](#)  
**To:** [Calvillo, Angela \(BOS\)](#); [Mchugh, Eileen \(BOS\)](#); [BOS-Supervisors](#); [BOS-Legislative Aides](#); [Elsbernd, Sean \(MYR\)](#); [Bruss, Andrea \(MYR\)](#); [Kirkpatrick, Kelly \(MYR\)](#); [Cretan, Jeff \(MYR\)](#); [Kittler, Sophia \(MYR\)](#); [Anatolia Lubos; pkilkenny@sftc.org](#); [Rose, Harvey \(BUD\)](#); [Newman, Debra \(BUD\)](#); [Campbell, Severin \(BUD\)](#); [Docs, SF \(LIB\)](#); [CON-EVERYONE](#); [Kaplan, Daniel \(HSA\)](#); [Simmons, Noelle \(HSA\)](#); [Tsutakawa, John \(HSA\)](#); [Gray, Candace \(HSA\)](#); [Iwasaki, Christina \(HSA\)](#); [Lugo, Tony \(HSA\)](#)  
**Subject:** Issued: Field Follow-up of the 2016 Audit of the Human Services Agency's Oversight of Arriba Juntos  
**Date:** Thursday, January 9, 2020 1:04:37 PM

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The Office of the Controller's City Services Auditor (CSA) today issued a memorandum on its assessment of corrective actions that the Human Services Agency (Human Services) has taken in response to CSA's 2016 report assessing Human Services' oversight of Arriba Juntos. The follow-up found that all recommendations have been fully implemented and are considered closed.

To view the full memorandum, please visit our website at:  
<http://openbook.sfgov.org/webreports/details3.aspx?id=2787>

This is a send-only e-mail address. For questions about the memorandum, please contact Acting Chief Audit Executive Mark de la Rosa at [mark.p.delarosa@sfgov.org](mailto:mark.p.delarosa@sfgov.org) or 415-554-7574 or the CSA Audits Division at 415-554-7469.

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# OFFICE OF THE CONTROLLER

## CITY AND COUNTY OF SAN FRANCISCO

Ben Rosenfield  
Controller

Todd Rydstrom  
Deputy Controller

## FIELD FOLLOW-UP MEMORANDUM

**TO:** Trent Rhorer, Executive Director  
Human Services Agency

**FROM:** Mark de la Rosa, Acting Chief Audit Executive   
Audits Division, City Services Auditor

**DATE:** January 9, 2020

**SUBJECT:** **Field Follow-up of the 2016 Audit of the Human Services Agency's Oversight of Arriba Juntos**

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### SUMMARY

The City and County of San Francisco (City) Office of the Controller's City Services Auditor (CSA) issued a report in August 2016, *San Francisco Human Services Agency: Oversight of Arriba Juntos Grants Needs Improvement to Better Ensure Delivery of Services*. CSA has completed a field follow-up to determine the corrective actions that the Human Services Agency (Human Services) has taken in response to the report. The report contains 11 recommendations, 10 of which have been implemented and 1 of which involves processes that are no longer applicable. All 11 recommendations are now closed.

### BACKGROUND, OBJECTIVE & METHODOLOGY

#### Background

In 2016, at the request of CSA, Sjoberg Evashenk Consulting audited Human Services' grant management practices related to Arriba Juntos, a nonprofit, community-based organization that for years has provided services to San Francisco residents under grant agreements with Human Services. Arriba Juntos provides a variety of job readiness training, job placement, and education programs through multiple agreements with the City. The 2016 audit included a focus on Human Services' oversight and monitoring of each of the Arriba Juntos programs required by the grant agreement.

The audit found that Human Services needed increased and more consistent communication among its staff and needed to further develop its oversight and monitoring practices. It also found that Human Services needed to ensure Arriba Juntos consistently meets program performance goals, tracks performance indicators more effectively, and better documents its program outreach and recruitment activities.

## Objective

The objective of this field follow-up was to determine whether Human Services has taken the corrective actions recommended in CSA's August 24, 2016, audit report on Human Services' oversight of Arriba Juntos. Consistent with Government Auditing Standards, Section 9.08, promulgated by the U.S. Government Accountability Office, the purposes of audit reports include facilitating follow-up to determine whether appropriate corrective actions have been taken.

This field follow-up is a nonaudit service. Government Auditing Standards do not cover nonaudit services, which are defined as professional services other than audits or attestation engagements. Therefore, Human Services is responsible for the substantive outcomes of the work performed during this follow-up and is responsible to be in a position, in fact and appearance, to make an informed judgment on the results of the nonaudit service.

## Methodology

To conduct this field follow-up, CSA:

- Obtained documentary evidence from Human Services.
- Interviewed Human Services staff to understand and verify the status and nature of the corrective actions taken.
- Verified the status of the recommendations that Human Services had reported as implemented.

## RESULTS

Human Services has fulfilled the intent of all 11 recommendations made in CSA's 2016 audit report regarding oversight of Arriba Juntos, which are now considered closed. One of the recommendations is no longer applicable because it pertains to grant programs that are now inactive. The following exhibit summarizes the status of the recommendations.

## Implemented and Closed Recommendations

Recommendation	Conclusion
Human Services Agency should:	
<p>1. Require Arriba Juntos to track and maintain the names of each client identified as a performance outcome on monthly performance reports submitted to Human Services for each grant program, such as enrollment, completion, and placement outcomes.</p>	<p>Arriba Juntos's grant agreements require it to submit monthly summary reports and individual participant reports to Human Services. These reports include the name of each client and track each client's program enrollment, completion, and placement outcomes. These reports are maintained through Human Services' Launchpad database (Launchpad).</p>
<p>2. Conduct ongoing evaluations comparing reported performance outcomes to minimum performance goals detailed in each program agreement to monitor Arriba Juntos's progress toward meeting performance goals. Document and discuss results with Arriba Juntos and determine appropriate follow-up.</p>	<p>Human Services conducts ongoing evaluations to confirm that Arriba Juntos is meeting minimum performance goals. Following these evaluations, Human Services provides monitoring results letters to Arriba Juntos and schedules meetings to discuss the results with Arriba Juntos.</p>
<p>3. At least annually, obtain a detailed listing of referrals sent to each program by applicable Human Services eligibility workers, employment specialists, or other staff authorized to refer clients into grant programs. Detailed referral information should include the name of the person referred, program referred to, and referral date. Track and assess individual program referrals to the individual program goals, calculate fallout rates for each program, and evaluate the reasonableness of performance measures. Periodically discuss results with Arriba Juntos.</p>	<p>Human Services tracks referrals through master rosters in Launchpad. These rosters contain detailed referral information, such as the name of the person referred and the program to which the person was referred. Human Services uses a Microsoft Power BI (business intelligence) dashboard that traces referrals to program outcomes, such as the number of program enrollments, completions, and job placements that resulted from each referral. Human Services also has implemented procedures by which authorized staff must approve referral requests. The monitoring results Human Services provides to Arriba Juntos include how referrals are affecting program outcomes. Although Human Services does not calculate fallout rates on the Power BI dashboard, Human Services employment specialists closely track individual clients who are referred to but do not enroll in programs.</p>

Recommendation	Conclusion
Human Services Agency should:	
<p>4. Periodically review program agreements to ensure performance goals align with Human Services' expectations and that performance goals may be realistically achieved. Update agreements as required to reflect current needs and objectives.</p>	<p>Human Services annually reviews and, when necessary, updates program agreements by adjusting performance goals.</p>
<p>5. Ensure Arriba Juntos consistently monitors client absences to identify clients needing to make up missed hours, develops a mechanism to record and track when clients make up missing attendance hours, evaluates each client's total program attendance hours to determine program progress toward meeting minimum hour requirements, and incorporates oversight and monitoring practices that reinforce existing attendance log procedures to ensure logs are filled out as intended.</p>	<p>Arriba Juntos tracks client attendance through weekly sign-in sheets, which detail when clients are absent for classes or workshops. Human Services also has implemented monitoring and oversight protocols that help ensure attendance logs are filled out properly.</p> <p>Using Launchpad, Human Services can track detailed client attendance information, such as the number of hours completed, absences, absence explanations, and the number of excused absence hours. Besides Launchpad, Human Services reports that it uses systems such as CalWIN<sup>1</sup> and spreadsheets in SharePoint to evaluate clients' progress toward meeting hourly program attendance requirements. With information from these sources, Human Services can effectively identify clients who need to make up missed hours.</p>
<p>6. Require Arriba Juntos to develop a centralized filing system for program documents. Client files, program monitoring and tracking reports, attendance logs, and other applicable program documents should be maintained in a central location to prevent any changes in program staff from impeding access to current and historical client records.</p>	<p>Arriba Juntos now uses Launchpad to track client information and client attendance and can use it to run performance reports for its grant programs. Program monitors can log and review information in Launchpad as needed to verify that Arriba Juntos is meeting program objectives.</p>

<sup>1</sup> California Work Opportunity and Responsibility to Kids Information Network.

Recommendation	Conclusion
Human Services Agency should:	
7. Ensure Arriba Juntos incorporates a process for consistently verifying that sufficient documentation that supports reported performance outcomes has been obtained and placed in client files.	Human Services implemented policies and procedures for Arriba Juntos to review client files and ensure they contain key documents that support performance outcomes. Arriba Juntos uses checklists to verify that sufficient documentation is included in client files.
8. Require Arriba Juntos to incorporate a formal method for tracking its outreach efforts, including outreach frequency and the names of organizations or community events visited, and broaden the demographic information captured from each client to include data that would demonstrate outreach efforts made to target populations listed in program agreements.	<p>Human Services has procedures that track outreach efforts based on their frequency, the type of outreach effort, and the organization or community event that Arriba Juntos visits or attends.</p> <p>The part of this recommendation related to demographic information is no longer applicable because the grant programs that this recommendation pertains to are now inactive. However, CSA recommends Human Services to create processes that tracks unique demographic information in the given case future grant programs would deem it necessary.</p>
9. Develop more rigorous annual program examinations to better substantiate the success of each program. Annual program examinations should include validating the accuracy of reported outcomes, evaluating overall program administration, and conducting walkthroughs of program facilities.	Human Services has implemented program monitoring policies that require annual walkthroughs of program facilities to confirm Arriba Juntos's progress towards meeting performance goals. During each walkthrough, Human Services validates the accuracy of reported program outcomes by reviewing participant files and evaluates program administration by gauging the program's quality.
10. Ensure its employment specialists communicate with other Human Services staff to confirm sufficient program funding is available before referring clients to various programs.	Human Services has active communication among its staff regarding budget modifications for specific grant programs. It updated the roles and responsibilities of community services monitors to act as primary contacts for program liaisons. Program liaisons manage participant referrals and coordinate services between Human Services and providers like Arriba Juntos. Because both community services monitors and program liaisons are involved in managing referrals and contracts, this assignment of responsibility assures that Human Services employees communicate with each other when funding concerns could limit referrals.

Recommendation	Conclusion
Human Services Agency should:	
11. Incorporate invoice reviews by program managers, in addition to fiscal staff, to ensure appropriate performance achievement by Arriba Juntos before invoice approval and payment.	Human Services requires its program managers to review and approve Arriba Juntos invoices before they are paid. Program managers oversee Arriba Juntos's program activities and performance, so are in the best position to know whether an invoice is accurate and reasonable. They also provide feedback to Arriba Juntos on its progress toward meeting its performance goals for the program seeking invoice approval.

CSA extends its appreciation to you and your staff who assisted with this review. If you have any questions or concerns, please call me at (415) 554-7574 or e-mail me at [mark.p.delarosa@sfgov.org](mailto:mark.p.delarosa@sfgov.org).

cc: Human Services Agency

Daniel Kaplan  
 Noelle Simmons  
 Tony Lugo  
 Christina Iwasaki  
 John Tsutakawa  
 Candace Gray

Controller

Ben Rosenfield  
 Todd Rydstrom  
 Steve Flaherty  
 Nicole Kelley  
 Mark Tipton  
 Amanda Kelley  
 Juan Pacheco

Board of Supervisors  
 Budget Analyst  
 Citizens Audit Review Board  
 City Attorney  
 Civil Grand Jury  
 Mayor  
 Public Library

# Attachment: Department Response

**City and County of San Francisco**



*London Breed, Mayor*

**Human Services Agency**

Department of Human Services  
Department of Disability and Aging Services  
Office of Early Care and Education

*Trent Rhorer, Executive Director*

January 2, 2020

Mark de La Rosa, Acting Chief Audit Executive  
City Hall, Room 476  
1 Dr. Carlton B. Goodlett Place  
San Francisco, CA 94102

**SUBJECT:** Field Follow-up of the 2016 Audit of the Human Services Agency's Oversight of Arriba Juntos Response

Dear Mr. de la Rosa,

Human Services Agency has received and reviewed the final draft audit report related to the compliance audit of our agency's contracts with Arriba Juntos. We have no changes to the draft. This letter is to confirm that we agree with the audit results. Please note we have implemented all the specific actions as recommended in the audit.

Thank you for the time and effort spent by the City Services Auditor staff on this audit.

If you have any questions, please contact Candace Gray at 415-557-6546.

Sincerely,

A handwritten signature in black ink that reads "Daniel B. Kaplan".

Daniel B. Kaplan  
Deputy Director for Finance and Administration

Cc: Trent Rhorer  
Noelle Simmons  
Tony Lugo  
Christina Iwasaki  
John Tsutakawa  
Candace Gray

**From:** [Board of Supervisors, \(BOS\)](#)  
**To:** [BOS-Supervisors](#)  
**Subject:** FW: Local Hire Annual Report 2019  
**Date:** Tuesday, January 7, 2020 5:09:00 PM  
**Attachments:** [Memo - Board of Supervisors - Local Hire Annual Report - January 2020.pdf](#)  
[2019 Local Hiring Policy Annual Report.pdf](#)

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**From:** Vergara, Christopher (ECN) <[chris.vergara@sfgov.org](mailto:chris.vergara@sfgov.org)>  
**Sent:** Tuesday, January 7, 2020 9:46 AM  
**To:** Calvillo, Angela (BOS) <[angela.calvillo@sfgov.org](mailto:angela.calvillo@sfgov.org)>  
**Cc:** Nim, Ken (ECN) <[ken.nim@sfgov.org](mailto:ken.nim@sfgov.org)>; Torres, Joaquin (ECN) <[joaquin.torres@sfgov.org](mailto:joaquin.torres@sfgov.org)>; Arce, Joshua (ECN) <[joshua.arce@sfgov.org](mailto:joshua.arce@sfgov.org)>  
**Subject:** Local Hire Annual Report 2019

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**From:** Arce, Joshua (ECN)  
**Sent:** Monday, January 06, 2020 6:34 PM  
**To:** Vergara, Christopher (ECN) <[chris.vergara@sfgov.org](mailto:chris.vergara@sfgov.org)>  
**Cc:** Nim, Ken (ECN) <[ken.nim@sfgov.org](mailto:ken.nim@sfgov.org)>  
**Subject:** Local Hire Annual Report 2019

Dear Board Clerk Calvillo,

On behalf of CityBuild Director Ken Nim, please find attached a memo regarding the 2019 Local Hire Report to the Board of Supervisors as well as the 2019 Report itself.

Thank you and please do not hesitate to reach out with any questions that you or your office might have.

Chris



OFFICE OF ECONOMIC AND WORKFORCE DEVELOPMENT  
WORKFORCE DEVELOPMENT DIVISION  
MEMORANDUM

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**TO:** ANGELA CALVILLO, CLERK TO SAN FRANCISCO BOARD OF SUPERVISORS

**FROM:** KEN NIM, DIRECTOR OF CITYBUILD

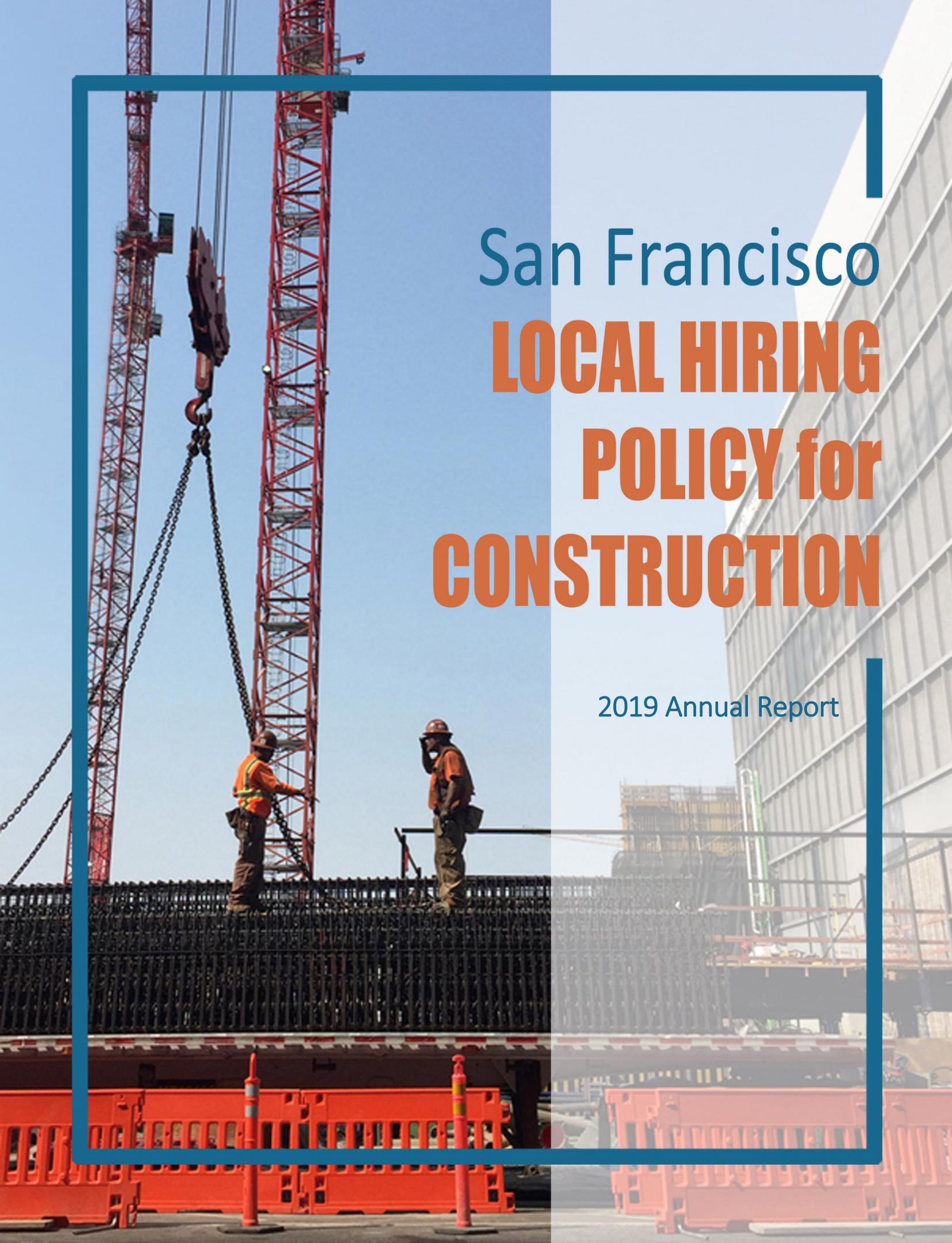
**SUBJECT:** LOCAL HIRE ANNUAL REPORT

**DATE:** 1/7/2020

**CC:**

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The Office of Economic and Workforce Development (OEWD) hereby submits the Year Eight (2018-2019) Annual Report for the San Francisco Local Hiring Policy for Construction to the Board of Supervisors. Pursuant to Administrative Code Chapter 82.9(f), OEWD shall submit an annual written report on outcomes under the Local Hiring Policy to the Board. Due to a series of significant technical challenges, this year's report experienced delays that we do not anticipate preventing the Year Nine (2019-20) report in April 2020. Thank you for your review.

A photograph of a construction site. Two tall red tower cranes are visible against a clear blue sky. In the foreground, two construction workers wearing orange safety vests and hard hats are standing on a rebar-reinforced concrete slab. Orange safety barriers and traffic cones are in the immediate foreground. The background shows a multi-story building under construction with a grid of windows.

# San Francisco **LOCAL HIRING POLICY** for **CONSTRUCTION**

2019 Annual Report



**2019** SAN FRANCISCO LOCAL HIRING POLICY FOR CONSTRUCTION  
ANNUAL REPORT TO THE SAN FRANCISCO BOARD OF SUPERVISORS

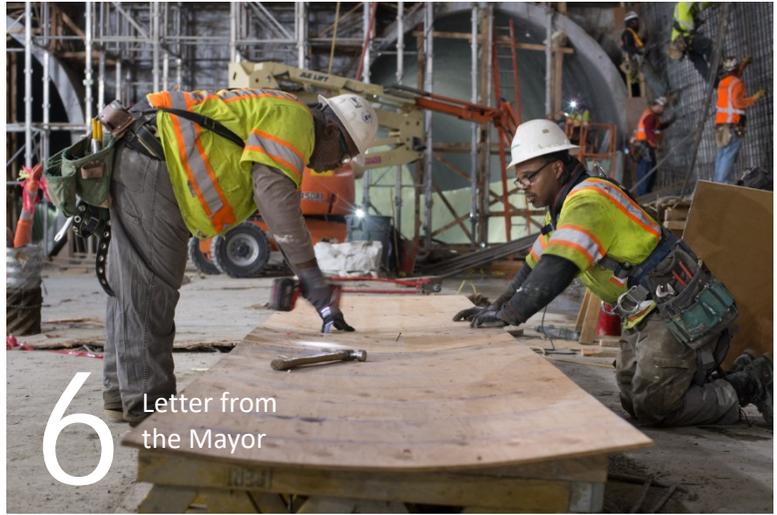
# Inside This Issue

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- 6 Greetings
- 7 About Us
- 9 Executive Summary
- 11 Department Highlights
- 13 Workforce
- 15 CityBuild
- 19** Work Hours



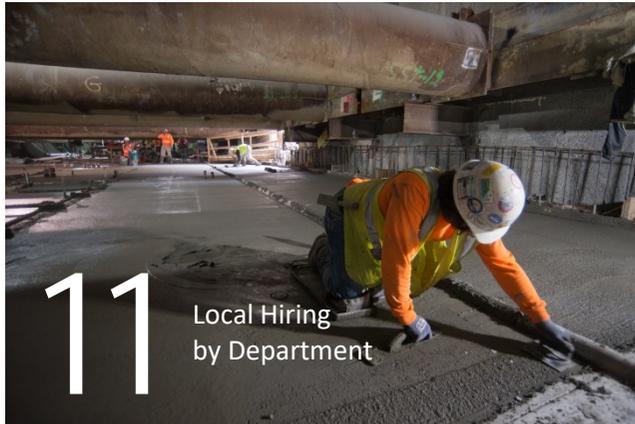
Executive Summary **9**



**6** Letter from the Mayor

### On the Cover

*The construction of new City offices and one-stop permit center at 49 South Van Ness*



**11** Local Hiring by Department



**19** Work Hour Tables

“Together, we are able to secure more jobs for San Franciscans, and create opportunities for generations to come.”

- **MAYOR LONDON N. BREED**



## GREETINGS FROM THE MAYOR OF SAN FRANCISCO

On behalf of the City and County of San Francisco, it is with great pleasure that I present the eighth Annual report for the San Francisco Local Hiring Policy for Construction.

San Francisco is a city of hope and opportunity, and I am optimistic about the future of our workforce. Construction in this city remains at an all-time high, and we must ensure that every San Francisco resident has the chance to be a part of our expanding construction industry. The Local Hiring Policy was designed to do just that.



With a multitude of opportunities in the local job market, and one of the lowest unemployment rates in the nation, our economy should work for everyone in this City. Each of our residents has the ability to shape this City's future. My own experience living and working in San Francisco were essential to my success and connected me with my community, and I want every person in this City to have the same opportunity. The Local Hiring Policy continues to preserve jobs for our residents. It provides a path for our local residents both to meaningful and well-paying jobs and to hope for the future.

I want to thank our contractor partners, trade unions, community-based organizations, and City department for their continued support of this Policy. We are expanding our existing programs like CityBuild, and launching new ones, to meet the demands of the local economy. Together, we are able to secure more jobs for San Franciscans, and create opportunities for generations to come.

I am proud, since the implementation of the Local Hiring Policy, local participation continues to meet the expectations of the legislation.

Sincerely,

A handwritten signature in black ink that reads "London Breed".

London Breed  
Mayor  
City and County of San Francisco



## About OEWD and The Local Hiring Policy

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The mission of the Office of Economic and Workforce Development (OEWD) is to advance equitable and shared prosperity for San Franciscans by growing sustainable jobs, supporting business of all sizes, creating great places to live and work, and helping everyone achieve economic self-sufficiency. OEWD's programs are responsible for strengthening San Francisco's many diverse neighborhoods and commercial corridors, creating a business climate where companies can grow and prosper, and ensuring a continually high quality of life for all San Franciscans.

OEWD's Workforce Development Division coordinates the San Francisco Workforce Development System, which is a network of public, private, and nonprofit service providers that serve San Francisco job seekers and employers. Workforce Development connects job seekers in San Francisco with employment opportunities in growing industries such as Technology, Health Care, Hospitality, and Construction. The Workforce Development Division provides industry aligned job training and access to job search assistance at community-based neighborhood job centers throughout the City, to help provide employers with skilled workers.

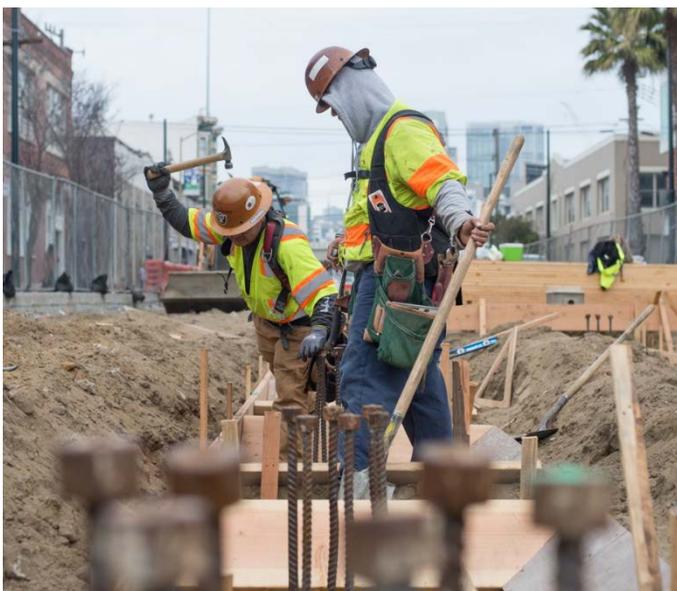
The Office of Economic and Workforce Development is charged with the administration of the Local Hiring Policy and is responsible for producing this Annual Report. OEWD's Construction program is administered by CityBuild and its team of Employment Liaisons and Compliance Officers.

## About The Policy

In December of 2010, the San Francisco Board of Supervisors approved amendments to Chapter 6.22(g) of the San Francisco Administrative Code, adopting the San Francisco Local Hiring Policy for Construction (“Policy”). The Policy was implemented on March 25, 2011 and is recognized as one of the strongest pieces of legislation in the country to promote the utilization of resident-hiring on locally sponsored projects.

In the Policy’s first year, the mandatory local hiring requirement was 20% by trade. The local hiring requirement increased by 5% each of the subsequent two years on March 25<sup>th</sup>. In its third year, after the local hiring requirement increased to 30% by trade as scheduled, the Policy entered an extended legislative review period. Subsequently, local workforce data provided in the 2013-2014 annual report was evaluated and Policy recommendations for legislative consideration were adopted by the San Francisco Board of Supervisors.

The Board of Supervisors amended the Policy to extend local hiring onto privately-funded projects on City-owned property. The Policy was expanded to cover new developments, tenant improvement work, temporary construction associated with special events, and work performed on real property leased or sold by the City for housing development.



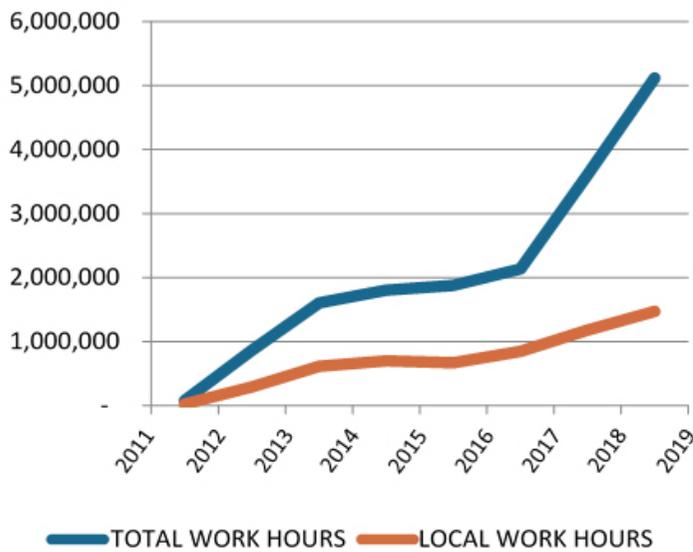
On March 14, 2017, the San Francisco Board of Supervisors voted in favor of amending the Local Hiring Policy to permanently set the mandatory participation level at 30% by trade. The local resident apprenticeship requirement has remained unchanged at 50%.

With multiple amendments to the Policy since its implementation, the Board of Supervisors approved the movement of the Local Hiring Policy from Chapter 6 of the San Francisco Administrative Code into Chapter 82 in March 2017. The movement of the Policy into its own independent chapter provides clarity on the modifications to the Policy, as well as highlights the Policy as a critical piece of workforce legislation in San Francisco.

# LOCAL HIRING BY THE NUMBERS

The eighth Annual Report for the San Francisco Local Hiring Policy for Construction was produced to inform the Board of Supervisors of the progress achieved since the implementation of the Policy in March 2011. This report highlights trade performance data, identifies workforce demographics and addresses priorities for the coming year.

## ANNUAL WORK HOURS



# 17.1

MILLION TOTAL WORK HOURS  
WERE PERFORMED ON  
COVERED PROJECTS

# 34%

OF ALL WORK HOURS  
WERE PERFORMED  
BY SAN FRANCISCO  
RESIDENTS

# 41%

INCREASE IN TOTAL  
WORK HOURS SINCE  
LAST YEAR

# 803

PROJECTS WERE  
COVERED BY THE POLICY

# 5.8

MILLION LOCAL HOURS

# 1.2

MILLION LOCAL  
APPRENTICE HOURS

# 49%

OF ALL APPRENTICE  
WORK HOURS WERE  
PERFORMED BY SAN  
FRANCISCO RESIDENTS

**W**ith a local construction industry that has experienced exponential growth since the implementation of the Policy, the data in this report identifies only a portion of the employment opportunities available to local residents. Beyond the capital improvement projects monitored in this report, there are numerous private developments – many of which will span decades – housing developments sponsored by other City agencies and a number of public works projects that are not covered by the Policy. While this is an exciting time for construction in San Francisco, it is also a challenging one, as local workers, contractors and training programs grapple with the demands of a booming economy during an era of record low unemployment. As this report shows, the Local Hiring Policy still effectively creates opportunities for local construction workers. Overall, projects subject to the Policy continued to meet the requirements of the legislation, even as the past year saw a 41% increase in work hours covered by the Policy.

## REPORT HIGHLIGHTS

The 803 projects included in this report were awarded and managed by six departments within the City and County of San Francisco: Municipal Transportation Agency (MTA), Port of San Francisco (Port), Public Utilities Commission (PUC), Recreation and Parks Department (RPD), San Francisco International Airport (SFO), and San Francisco Public Works (SFPW).

- A total of 17,091,221 hours have been worked on projects subject to the Local Hiring Policy since 2011
- 4.6 million total work hours within the last year alone were subject to the Policy, a 41% increase from 2017-2018
- 34%, or more than 5.8 million hours, of construction on capital improvements projects were contributed by local residents since 2011
- 639 projects have been subject to the 30% requirement and have reported an overall local hiring performance of 36%
- Overall, local apprentice participation remains high with an average performance of 49% to date
- Expanded training initiatives are proposed to address the demands of a booming construction economy.

## CHALLENGES AND RECOMMENDATIONS

The unemployment rate in San Francisco has been one of the lowest in the nation, while construction continues to escalate. Developing a strong pipeline of local, skilled workers remains the primary challenge to the success of the Policy. The pace at which new apprentices are entering the workforce must be accelerated in order to meet the demands of the industry, particularly as many seasoned construction workers approach retirement and more local developments are adopting similar workforce policies.

The Office of Economic and Workforce Development (OEWD) strengthens construction career pathways by building on its relationships with industry and training partners. Through ongoing efforts with City College of San Francisco, the San Francisco Unified School District, the Human Services Agency, Adult Probation Service and re-entry service providers, the Housing Authority and Mayor’s Office of Housing and Community Development, and community-based organizations, OEWD enhances and expands training in specialized trades for local residents.

Further innovative options to increase training capacity, expand CityBuild’s connection to additional neighborhoods and jobseekers, and enhance GED programming and other barrier removal strategies must be advanced.

## LOOKING AHEAD

OEWD’s goal is to ensure that the Local Hiring Policy for Construction remains beneficial to local workers and the San Francisco economy. OEWD is committed to creating training and employment opportunities for local workers. Through additional construction training programs and expanded partnerships with industry stakeholders, OEWD will continue to address the workforce needs of the construction industry.

# Local Hiring by Awarding Department



	PORT OF SAN FRANCISCO	SFO	SFMTA
PROJECTS COVERED BY THE POLICY	30	117	23
TOTAL HOURS PERFORMED	558K	6M	511K
LOCAL WORKER HOURS	26%	30%	39%
LOCAL APPRENTICE HOURS	40%	46%	49%





PROJECTS COVERED BY THE POLICY

TOTAL HOURS PERFORMED

LOCAL WORKER HOURS

LOCAL APPRENTICE HOURS

256

315

63

3.4M

5.8M

772K

44%

31%

40%

67%

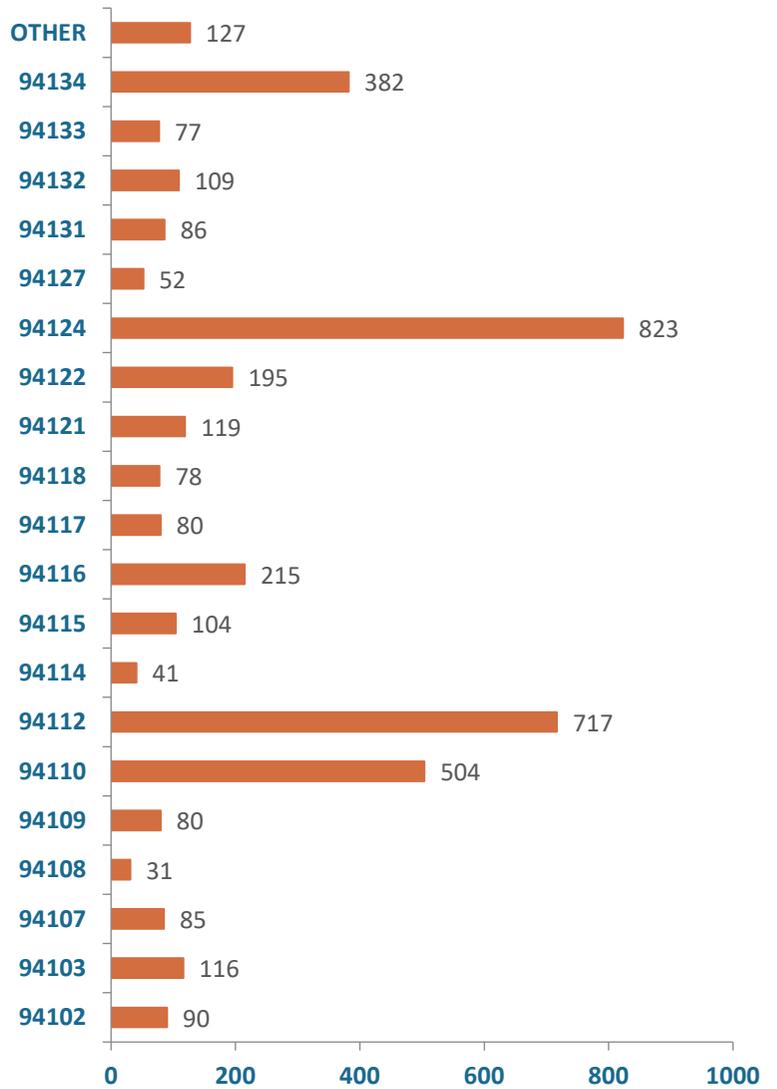
45%

59%



# SAN FRANCISCO WORKERS BY ZIP CODE

2011 – 2019



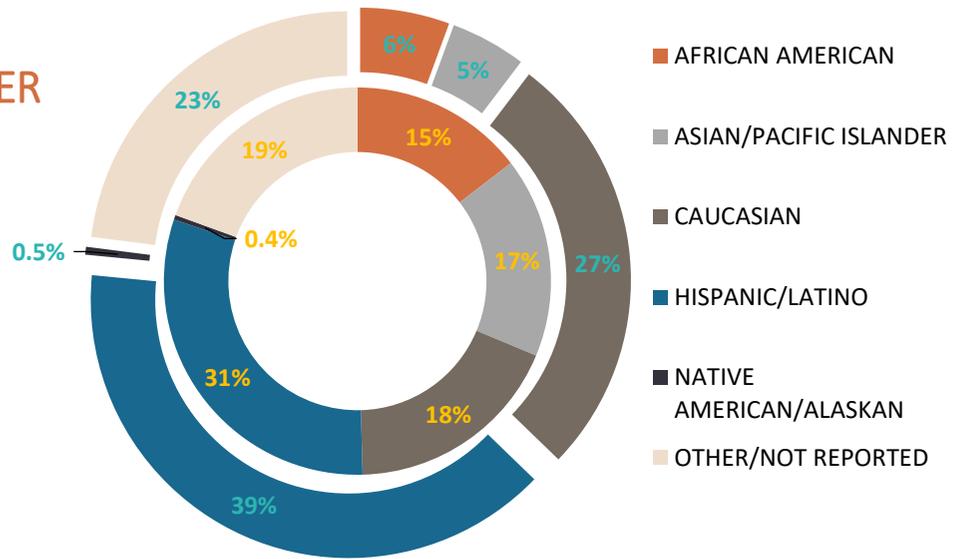
# WORKERS BY COUNTY OF RESIDENCE

2011 - 2019



# ETHNICITY, RACE & GENDER

2011 – 2019



\* outer circle represents all workers, inner circle represents SF workers

	AFRICAN AMERICAN	ASIAN OR PACIFIC ISLANDER	CAUCASIAN	HISPANIC/LATINO	NATIVE AMERICAN/ALASKAN	OTHER
ALL WORKERS	1,660	1,403	7,964	11,641	145	6,807
SF WORKERS	599	687	752	1,257	16	800



	SAN FRANCISCO WORKERS		ALL WORKERS	
FEMALE	218	5.3%	586	1.9%
MALE	3702	90.1%	27,619	93.2%
DATA UNAVAILABLE	191	4.6%	1,488	5.0%
<b>TOTAL</b>	<b>4,111</b>		<b>29,620</b>	



## CityBuild Academy

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CityBuild Academy aims to meet the demands of the construction industry by providing comprehensive pre-apprenticeship and construction administration training to San Francisco residents.

The Academy offers an 18-week pre-apprenticeship and construction skills training program at the City College of San Francisco, Evans Campus. Trainees can earn college credits while learning foundational skills, obtaining industry-recognized certifications, and gaining knowledge to enter the construction trades as successful new apprentices. Since 2006, 1,157 San Francisco residents have graduated from CityBuild Academy and 1,017 graduates have secured employment in various construction trades.

## CityBuild Partnerships

In an ongoing effort to strengthen and expand the CityBuild Academy curriculum, CityBuild has cultivated partnerships with various union apprenticeship programs:

- Bay Area Plastering Industry Joint Apprenticeship Training Committee
- Carpenters' Training Committee of Northern California
- Cement Mason Pre-Apprenticeship Training Program
- IBEW Local 6 San Francisco Joint Apprenticeship and training Committee
- Ironworkers Apprenticeship Training
- Northern California Laborers' Training Center
- Operating Engineers Local 3 Journeyman and Apprentice Training Center
- Painters and Allied Trades District Council 16
- Sheet Metal Workers' Local 104 Training Center
- UA Local 38 Joint Apprenticeship and Training Committee



## Construction Administration and Professional Services Academy (CAPSA)

The Construction Administration and Professional Services Academy (CAPSA) is a semester-long program offered at the City College of San Francisco, Mission Campus. Led by Mission Hiring Hall, the program prepares San Francisco residents for entry-level careers as professional construction office administrators. Participants graduate with extensive knowledge of the construction sequence of work, construction office accounting, construction project coordination and other professional skills. Since 2010, 343 San Francisco residents have completed the program and 184 graduates have been placed in administrative positions.

# Work Hours

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The following tables present hours worked by local residents on projects subject to the Policy. Local participation levels are summarized by mandated percentages and departmental performance.

OEWD utilizes certified payroll records from the City's Project Reporting System (PRS), to verify hours worked by San Francisco residents. Certified payroll data entered into the City's PRS between March 25, 2011 and April 1, 2019 was used to produce this report. The data presented summarizes local hours performed on covered projects by hiring requirement rather than by annual performance.



## 20% OVERVIEW

Projects advertised between March 25, 2012 and March 24, 2013 are subject to a 25% local hiring requirement, 7% at SFO.

### NUMBER AND VALUE OF PROJECTS SUBJECT TO 20% REQUIREMENT BY DEPARTMENT

Department	PORT	SFO	MTA	PUC	SFPW	RPD	Total
Number of Covered Projects	9	9	1	26	25	8	<b>79</b>
Total Award Amount	\$117M	\$116M	\$1M	\$79M	\$39M	\$31M	<b>\$383M</b>

### WORK HOURS BY DEPARTMENT FOR PROJECTS SUBJECT TO 25% REQUIREMENT

Department	Total Hours			Apprentice Hours		
	Total	Local	Local %	Total	Local	Local %
PORT	377,857	94,470	25%	53,301	20,406	38%
SFO (7%)	438,780	153,602	35%	69,887	42,672	61%
MTA	6,812	2,939	43%	1,112	817	74%
PUC	410,787	147,903	36%	39,845	31,225	78%
SFPW	229,358	91,870	40%	18,645	12,601	68%
RPD	192,480	63,241	33%	20,781	13,425	65%
<b>TOTAL</b>	<b>1,656,075</b>	<b>554,025</b>	<b>33%</b>	<b>203,570</b>	<b>121,146</b>	<b>60%</b>

### WORK HOURS BY TRADE FOR PROJECTS SUBJECT TO 20% REQUIREMENT

Trade	Total Hours			Apprentice Hours		
	Total	Local	Local %	Total	Local	Local %
Asbestos Removal Worker	23,431	4,848	21%	0	0	0%
Carpenter And Related Trades	115,002	47,244	41%	16,159	8,308	51%
Cement Mason	59,203	14,962	25%	6,060	5,032	83%
Drywall Installer/Lather	63,615	9,271	15%	7,956	3,738	47%
Electrician	211,138	101,819	48%	36,702	23,880	65%
Glazier	13,691	2,190	16%	1,945	641	33%
Iron Worker	86,086	25,995	30%	16,013	8,113	51%
Laborer And Related Classifications	637,833	224,507	35%	61,915	45,699	74%
Operating Engineer	135,529	48,327	36%	5,682	4,604	81%
Painter	28,891	7,023	24%	2,640	750	28%
Pile Driver	43,127	5,206	12%	10,751	1,936	18%
Plaster Tender	12,125	1,571	13%	0	0	0%
Plasterer	11,622	2,496	21%	2,940	1,454	49%
Plumber	61,043	22,701	37%	16,762	8,749	52%
Roofer	14,008	1,706	12%	2,604	1,262	48%
Sheet Metal Worker	40,476	10,379	26%	7,007	3,226	46%
Other Trades*	99,258	23,784	24%	8,437	3,757	45%
<b>Total</b>	<b>1,656,075</b>	<b>554,025</b>	<b>33%</b>	<b>203,570</b>	<b>121,146</b>	<b>60%</b>

\*Other Trades: Asbestos Worker, Heat And Frost Insulator, Boilermaker, Brick Tender, Bricklayer/Blocklayer, Building/Construction Inspector And Field Soils And Material Tester, Carpet, Linoleum, Soft Floor Layer, Dredger Operating Engineer, Driver, Electrical Utility Lineman, Elevator Constructor, Field Surveyor, Landscape Maintenance Laborer, Marble Finisher, Metal Roofing Systems Installer, Modular Furniture Installer, Parking And Highway Improvement, Parking And Highway Improvement Painter, Slurry Seal Worker, Steel Erector And Fabricator, Teamster, Terrazzo Finisher, Terrazzo Worker, Tile Finisher, Tile Setter, Traffic Control/Lane Closure, Tunnel Worker.

## 25% OVERVIEW

Projects advertised between March 25, 2012 and March 24, 2013 are subject to a 25% local hiring requirement, 8% at SFO.

### NUMBER AND VALUE OF PROJECTS SUBJECT TO 25% REQUIREMENT BY DEPARTMENT

Department	PORT	SFO	MTA	PUC	SFPW	RPD	Total
Number of Covered Projects	1	9	1	30	38	7	<b>85</b>
Total Award Amount	\$0.4M	\$255M	\$4M	\$234M	\$537M	\$18M	<b>\$1B</b>

### WORK HOURS BY DEPARTMENT FOR PROJECTS SUBJECT TO 25% REQUIREMENT

Department	Total Hours			Apprentice Hours		
	Total	Local	Local %	Total	Local	Local %
PORT	1,370	903	66%	215	0	0%
SFO (8%)	945,645	347,759	37%	167,381	93,976	56%
MTA	24,096	9,161	38%	8,537	3,771	44%
PUC	491,575	187,516	38%	57,150	36,929	65%
SFPW	2,644,977	641,001	24%	467,781	175,032	37%
RPD	73,984	32,725	44%	6,659	3,608	54%
<b>TOTAL</b>	<b>4,181,645</b>	<b>1,219,066</b>	<b>29%</b>	<b>707,722</b>	<b>313,314</b>	<b>44%</b>

### WORK HOURS BY TRADE FOR PROJECTS SUBJECT TO 25% REQUIREMENT

Trade	Total Hours			Apprentice Hours		
	Total	Local	Local %	Total	Local	Local %
Asbestos Removal Worker	76,580	15,057	20%	0	0	0%
Carpenter And Related Trades	351,435	104,424	30%	52,588	20,951	40%
Cement Mason	99,220	19,474	20%	12,748	6,034	47%
Drywall Installer/Lather	299,227	47,162	16%	51,125	14,568	28%
Electrician	665,050	267,829	40%	147,208	84,403	57%
Glazier	75,945	18,261	24%	16,005	6,803	43%
Iron Worker	372,354	105,740	28%	101,369	42,244	42%
Laborer And Related Classifications	1,036,962	355,551	34%	81,589	52,560	64%
Operating Engineer	196,520	58,651	30%	8,541	5,925	69%
Painter	260,183	46,789	18%	54,443	8,577	16%
Pile Driver	150,696	19,361	13%	20,422	4,217	21%
Plaster Tender	24,143	7,100	29%	2,445	1,433	59%
Plasterer	14,972	1,930	13%	0	0	0%
Plumber	54,519	6,382	12%	9,532	3,404	36%
Roofer	239,963	85,654	36%	71,357	33,945	48%
Sheet Metal Worker	101,686	15,648	15%	31,964	7,618	24%
Other Trades*	162,192	44,055	27%	46,387	20,634	44%
<b>Total</b>	<b>4,181,645</b>	<b>1,219,066</b>	<b>29%</b>	<b>707,722</b>	<b>313,314</b>	<b>44%</b>

\*Other Trades: Asbestos Worker, Heat and Frost Insulator, Boilermaker, Brick Tender, Bricklayer/Blocklayer, Building/Construction Inspector and Field Soils and Material Tester, Carpet, Linoleum, Soft Floor Layer, Driver, Electrical Utility Lineman, Elevator Constructor, Field Surveyor, Landscape Maintenance Laborer, Marble Finisher, Marble Mason, Marble Setter, Metal Roofing Systems Installer, Modular Furniture Installer, Mover, Parking and Highway Improvement, Parking and Highway Improvement Painter, Slurry Seal Worker, Steel Erector and Fabricator, Teamster, Telecommunications Technician, Terrazzo Finisher, Terrazzo Worker, Tile Finisher, Tile Setter, Traffic Control/Lane Closure, Tree Trimmer and Water Well Driller.

## 30% OVERVIEW

Projects advertised since March 25, 2013 are subject to a 30% local hiring requirement, 11% at SFO.

### NUMBER AND VALUE OF PROJECTS SUBJECT TO 30% REQUIREMENT BY DEPARTMENT

Department	PORT	SFO	MTA	PUC	SFPW	RPD	Total
Number of Covered Projects	20	98	21	200	252	48	<b>639</b>
Total Award Amount	\$128M	\$3.6B	\$528M	\$1.7B	\$1.8B	\$98M	<b>\$7.8B</b>

### WORK HOURS BY DEPARTMENT FOR PROJECTS SUBJECT TO 30% REQUIREMENT

Department	Total Hours			Apprentice Hours		
	Total	Local	Local %	Total	Local	Local %
PORT	179,429	52,009	29%	29,441	12,697	43%
<b>SFO (11%)</b>	<b>4,645,016</b>	<b>1,324,846</b>	<b>29%</b>	<b>861,313</b>	<b>370,473</b>	<b>43%</b>
MTA	479,873	185,666	39%	55,547	27,577	50%
PUC	2,494,622	1,151,372	46%	274,715	181,606	66%
SFPW	2,948,547	1,093,161	37%	394,768	207,046	52%
RPD	506,064	210,532	42%	51,420	29,298	57%
<b>TOTAL</b>	<b>11,253,551</b>	<b>4,017,586</b>	<b>36%</b>	<b>1,667,205</b>	<b>828,695</b>	<b>50%</b>

### WORK HOURS BY TRADE FOR PROJECTS SUBJECT TO 30% REQUIREMENT

Trade	Total Hours			Apprentice Hours		
	Total	Local	Local %	Total	Local	Local %
Asbestos Removal Worker	146,900	16,986	12%	0	0	0%
Carpenter And Related Trades	1,047,362	346,121	33%	230,759	104,453	45%
Cement Mason	405,537	144,184	36%	71,240	35,650	50%
Drywall Installer/Lather	465,372	79,063	17%	97,446	26,163	27%
Electrician	1,507,165	642,819	43%	308,507	212,026	69%
Glazier	67,300	13,857	21%	20,854	6,288	30%
Iron Worker	552,667	130,376	24%	170,701	46,891	27%
Laborer And Related Classifications	4,137,480	1,669,119	40%	374,472	241,124	64%
Operating Engineer	1,022,169	451,771	44%	53,084	31,671	60%
Painter	688,232	159,007	23%	78,534	24,558	31%
Pile Driver	180,862	46,618	26%	27,110	9,788	36%
Plaster Tender	138,177	14,732	11%	24,242	3,742	15%
Plasterer	21,379	2,021	9%	984	0	0%
Plumber	36,165	,424	12%	11,164	2,677	24%
Roofer	465,829	193,936	42%	96,669	49,848	52%
Sheet Metal Worker	178,948	36,499	20%	58,636	13,847	24%
Other Trades*	192,008	66,055	34%	42,805	19,971	47%
<b>Total</b>	<b>11,253,551</b>	<b>4,017,586</b>	<b>36%</b>	<b>1,667,205</b>	<b>828,695</b>	<b>50%</b>

\*Other Trades: Asbestos Worker, Heat and Frost Insulator, Boilermaker, Brick Tender, Bricklayer/Blocklayer, Building/Construction Inspector and Field Soils and Material Tester, Carpet, Linoleum, Resilient Tile Layer, Carpet, Linoleum, Soft Floor Layer, Dredger Operating Engineer, Driver, Electrical Utility Lineman, Elevator Constructor, Field Surveyor, Landscape Maintenance Laborer, Marble Finisher, Marble Mason, Metal Roofing Systems Installer, Modular Furniture Installer, Parking and Highway Improvement Painter, Slurry Seal Worker, Steel Erector and Fabricator, Teamster, Telecommunications Technician, Terrazzo Finisher, Terrazzo Worker, Tile Finisher, Tile Setter, Traffic Control/Lane Closure, Tree Maintenance, Tunnel Worker and Water Well Driller.



WORK HOURS REPORTED

REQUIREMENT	NUMBER OF PROJECTS	TOTAL HOURS			APPRENTICE HOURS		
		Total	Local	Local %	Total	Total	Local %
20%	9	377,857	94,470	25%	53,301	20,406	38%
25%	1	1,370	903	66%	215	0	0%
30%	20	179,429	52,009	29%	29,441	12,697	43%
<b>TOTAL</b>	<b>30</b>	<b>558,656</b>	<b>147,382</b>	<b>26%</b>	<b>82,957</b>	<b>33,103</b>	<b>40%</b>

WORK HOURS BY TRADE

TRADE	REQUIREMENT	TOTAL HOURS			APPRENTICE HOURS		
		Total	Local	Local %	Total	Local	Local %
ASBESTOS REMOVAL WORKER	20%	1,142	80	7%	0	0	0%
	25%	0	0	0%	0	0	0%
	30%	8,807	1,991	23%	0	0	0%
CARPENTER AND RELATED TRADES	20%	30,014	11,561	39%	3,416	1,210	35%
	25%	0	0	0%	0	0	0%
	30%	23,820	11,846	50%	6,967	5,778	83%
CEMENT MASON	20%	15,852	2,786	18%	966	124	13%
	25%	0	0	0%	0	0	0%
	30%	2,443	1,375	56%	8	8	100%
DRYWALL INSTALLER/LATHER	20%	18,152	3,202	18%	923	913	99%
	25%	0	0	0%	0	0	0%
	30%	26	0	0%	0	0	0%
ELECTRICIAN	20%	61,826	10,572	17%	9,611	3,133	33%
	25%	927	648	70%	215	0	0%
	30%	3,769	1,730	46%	1,367	1,226	90%
GLAZIER	20%	4,821	1,245	26%	474	148	31%
	25%	0	0	0%	0	0	0%
	30%	1,250	754	60%	0	0	0%
IRON WORKER	20%	42,142	12,640	30%	8,057	4,644	58%
	25%	0	0	0%	16	0	0%
	30%	2,859	515	18%	385	96	25%
LABORER AND RELATED CLASSIFICATIONS	20%	68,401	25,778	38%	2,492	1,949	78%
	25%	339	256	75%	0	0	0%
	30%	45,691	15,286	33%	2,895	2,237	77%
OPERATING ENGINEER	20%	24,343	4,674	19%	1,141	1,089	95%
	25%	104	0	0%	0	0	0%
	30%	27,561	6,328	23%	1,269	447	35%
PAINTER	20%	12,341	2,804	23%	1,571	293	19%
	25%	0	0	0%	0	0	0%
	30%	1,929	1,085	56%	0	0	0%
PLUMBER	20%	26,337	8,021	30%	9,715	4,392	45%
	25%	0	0	0%	0	0	0%
	30%	4,405	3,133	71%	808	472	58%
ROOFER	20%	1,772	42	2%	272	40	15%
	25%	0	0	0%	0	0	0%
	30%	23,448	4,944	21%	9,113	2,241	25%
SHEET METAL WORKER	20%	13,676	3,017	22%	2,588	290	11%
	25%	0	0	0%	0	0	0%
	30%	404	0	0%	16	0	0%
OTHER TRADES *	20%	57,039	8,051	14%	12,078	2,182	18%
	25%	0	0	0%	0	0	0%
	30%	14,503	2,007	14%	565	16	3%

\*Other Trades: Asbestos Worker, Heat And Frost Insulator, Boilermaker, Brick Tender, Bricklayer/Blocklayer, Building/Construction Inspector And Field Soils And Material Tester, Carpet, Linoleum, Soft Floor Layer, Dredger Operating Engineer, Driver, Electrical Utility Lineman, Elevator Constructor, Field Surveyor, Landscape Maintenance Laborer, Metal Roofing Systems Installer, Modular Furniture Installer, Parking And Highway Improvement Painter, Pile Driver, Plasterer, Teamster, Tile Finisher, and Tile Setter

In accordance with a reciprocity agreement between the City and County of San Francisco and San Mateo County, both San Francisco and San Mateo County residents working on public works projects at SFO are considered local workers. Requirements for SFO were established at 7%, 8% and 11%.

## WORK HOURS REPORTED

REQUIREMENT	NUMBER OF PROJECTS	TOTAL HOURS			APPRENTICE HOURS		
		Total	Local	Local %	Total	Total	Local %
7%	9	438,780	153,602	35%	69,887	42,672	61%
8%	9	945,645	347,759	37%	167,381	93,976	56%
11%	65	4,645,016	1,324,846	29%	861,313	370,473	43%
<b>TOTAL</b>	<b>83</b>	<b>6,029,441</b>	<b>1,826,207</b>	<b>30%</b>	<b>1,039,581</b>	<b>507,121</b>	<b>46%</b>

## WORK HOURS BY TRADE

TRADE	REQUIREMENT	TOTAL HOURS			APPRENTICE HOURS		
		Total	Local	Local %	Total	Local	Local %
ASBESTOS REMOVAL WORKER	7%	7,813	1,671	21%	0	0	0%
	8%	18,637	3,103	17%	0	0	0%
	11%	87,636	10,316	12%	0	0	0%
CARPENTER AND RELATED TRADES	7%	40,610	11,603	29%	5,231	3,233	62%
	8%	60,361	20,443	34%	4,569	2,552	56%
	11%	592,863	142,961	24%	145,985	54,359	37%
CEMENT MASON	7%	7,315	429	6%	311	167	54%
	8%	10,077	1,114	11%	1,502	236	16%
	11%	78,759	10,086	13%	11,874	4,003	34%
DRYWALL INSTALLER/LATHER	7%	42,878	5,778	13%	6,524	2,678	41%
	8%	94,481	19,374	21%	11,342	5,908	52%
	11%	371,228	48,386	13%	80,713	17,608	22%
ELECTRICIAN	7%	110,908	73,762	67%	21,899	18,186	83%
	8%	295,430	161,751	55%	70,460	46,860	67%
	11%	1,098,301	446,865	41%	204,995	135,758	66%
GLAZIER	7%	6,027	689	11%	1,148	493	43%
	8%	17,368	5,041	29%	4,084	2,327	57%
	11%	49,905	7,681	15%	15,539	4,001	26%
IRON WORKER	7%	33,824	9,959	29%	7,238	3,313	46%
	8%	60,667	11,503	19%	13,656	4,217	31%
	11%	387,073	80,366	21%	127,933	33,749	26%
LABORER AND RELATED CLASSIFICATIONS	7%	74,851	17,240	23%	8,280	3,419	41%
	8%	153,288	35,584	23%	14,306	7,803	55%
	11%	794,306	236,373	30%	60,621	36,889	61%
OPERATING ENGINEER	7%	13,739	3,260	24%	493	493	100%
	8%	18,106	3,624	20%	744	55	7%
	11%	234,262	71,049	30%	15,926	8,350	52%
PAINTER	7%	10,488	1,973	19%	540	124	23%
	8%	31,072	7,080	23%	2,567	291	11%
	11%	89,124	17,581	20%	13,375	4,022	30%
PLUMBER	7%	21,699	10,791	50%	5,137	3,127	61%
	8%	69,799	39,996	57%	19,291	11,655	60%
	11%	314,139	130,198	41%	62,348	34,027	55%
ROOFER	7%	6,100	956	16%	1,158	665	57%
	8%	8,706	775	9%	2,348	775	33%
	11%	80,789	11,198	14%	25,484	4,838	19%
SHEET METAL WORKER	7%	14,580	5,914	41%	3,304	2,917	88%
	8%	44,331	20,300	46%	11,900	6,004	50%
	11%	121,702	47,499	39%	27,004	16,566	61%
OTHER TRADES *	7%	47,948	9,579	20%	8,625	3,860	45%
	8%	63,322	18,074	29%	10,614	5,294	50%
	11%	207,251	48,187	23%	43,867	11,603	26%

\*Other Trades: Asbestos Worker, Heat And Frost Insulator, Brick Tender, Bricklayer/Blocklayer, Building/Construction Inspector And Field Soils And Material Tester, Carpet, Linoleum, Soft Floor Layer, Driver, Electrical Utility Lineman, Elevator Constructor, Field Surveyor, Landscape Maintenance Laborer, Marble Finisher, Marble Mason, Modular Furniture Installer, Parking And Highway Improvement Painter, Pile Driver, Plasterer, Slurry Seal Worker, Steel Erector and Fabricator, Teamster, Telecommunications Technician, Terrazzo Finisher, Terrazzo Worker, Tile Finisher, Tile Setter, Traffic Control/Lane Closure and Water Well Driller

WORK HOURS REPORTED

REQUIREMENT	NUMBER OF PROJECTS	TOTAL HOURS			APPRENTICE HOURS		
		Total	Local	Local %	Total	Total	Local %
20%	1	6,813	2,940	43%	1,112	818	74%
25%	1	24,096	9,161	38%	8,537	3,771	44%
30%	21	479,873	185,666	39%	55,547	27,577	50%
<b>TOTAL</b>	<b>23</b>	<b>510,782</b>	<b>197,767</b>	<b>39%</b>	<b>65,196</b>	<b>32,166</b>	<b>49%</b>

WORK HOURS BY TRADE

TRADE	REQUIREMENT	TOTAL HOURS			APPRENTICE HOURS		
		Total	Local	Local %	Total	Local	Local %
ASBESTOS REMOVAL WORKER	20%	0	0	0%	0	0	0%
	25%	0	0	0%	0	0	0%
	30%	30	30	100%	0	0	0%
CARPENTER AND RELATED TRADES	20%	0	0	0%	0	0	0%
	25%	0	0	0%	0	0	0%
	30%	11,692	3,466	30%	1,508	926	61%
CEMENT MASON	20%	785	182	23%	9	9	100%
	25%	0	0	0%	0	0	0%
	30%	21,157	5,511	26%	2,987	1,587	53%
DRYWALL INSTALLER/LATHER	20%	0	0	0%	0	0	0%
	25%	0	0	0%	0	0	0%
	30%	0	0	0%	0	0	0%
ELECTRICIAN	20%	1,132	860	76%	476	215	45%
	25%	1,974	1,024	52%	157	157	100%
	30%	17,390	10,006	58%	6,264	4,368	70%
GLAZIER	20%	0	0	0%	0	0	0%
	25%	201	70	35%	70	70	100%
	30%	0	0	0%	0	0	0%
IRON WORKER	20%	0	0	0%	0	0	0%
	25%	231	112	48%	0	0	0%
	30%	3,622	1,177	32%	57	38	67%
LABORER AND RELATED CLASSIFICATIONS	20%	4,471	1,705	38%	627	594	95%
	25%	0	0	0%	0	0	0%
	30%	293,961	117,624	40%	27,178	11,610	43%
OPERATING ENGINEER	20%	401	171	43%	0	0	0%
	25%	352	0	0%	0	0	0%
	30%	63,895	35,646	56%	4,970	2,861	58%
PAINTER	20%	0	0	0%	0	0	0%
	25%	0	0	0%	0	0	0%
	30%	385	267	69%	34	0	0%
PLUMBER	20%	0	0	0%	0	0	0%
	25%	42	42	100%	0	0	0%
	30%	2,091	282	13%	180	54	30%
ROOFER	20%	0	0	0%	0	0	0%
	25%	16,451	5,831	35%	7,801	3,544	45%
	30%	2,168	602	28%	891	242	27%
SHEET METAL WORKER	20%	0	0	0%	0	0	0%
	25%	4,846	2,083	43%	510	0	0%
	30%	552	100	18%	245	100	41%
OTHER TRADES *	20%	25	22	88%	0	0	0%
	25%	0	0	0%	0	0	0%
	30%	62,865	10,956	17%	11,236	5,792	52%

\*Other Trades: Brick Tender, Bricklayer/ Blocklayer, Driver, Electrical Utility Lineman, Field Surveyor, Parking and Highway Improvement Painter, Pile Driver, Teamster, and Traffic Control/Lane Closure

WORK HOURS REPORTED

REQUIREMENT	NUMBER OF PROJECTS	TOTAL HOURS			APPRENTICE HOURS		
		Total	Local	Local %	Total	Total	Local %
20%	26	410,787	147,903	36%	39,845	31,225	78%
25%	30	491,575	187,516	38%	57,150	36,929	65%
30%	200	2,494,622	1,151,372	46%	274,715	181,606	66%
<b>TOTAL</b>	<b>256</b>	<b>3,396,984</b>	<b>1,486,791</b>	<b>44%</b>	<b>371,710</b>	<b>249,760</b>	<b>67%</b>

WORK HOURS BY TRADE

TRADE	REQUIREMENT	TOTAL HOURS			APPRENTICE HOURS		
		Total	Local	Local %	Total	Local	Local %
ASBESTOS REMOVAL WORKER	20%	232	0	0%	0	0	0%
	25%	3,548	1,166	33%	0	0	0%
	30%	7,751	1,492	19%	0	0	0%
CARPENTER AND RELATED TRADES	20%	4,128	2,494	60%	509	424	83%
	25%	27,810	9,753	35%	4,726	2,608	55%
	30%	110,977	53,535	48%	18,532	11,715	63%
CEMENT MASON	20%	9,219	2,208	24%	1,495	1,495	100%
	25%	12,532	5,549	44%	1,845	1,181	64%
	30%	65,154	32,457	50%	10,633	8,228	77%
DRYWALL INSTALLER/LATHER	20%	0	0	0%	0	0	0%
	25%	1,348	228	17%	0	0	0%
	30%	16,426	11,262	69%	3,680	2,930	80%
ELECTRICIAN	20%	19,363	7,603	39%	2,716	1,165	43%
	25%	49,323	24,768	50%	8,414	5,959	71%
	30%	191,530	104,128	54%	48,525	40,890	84%
GLAZIER	20%	0	0	0%	0	0	0%
	25%	319	177	56%	0	0	0%
	30%	3,182	2,100	66%	539	138	26%
IRON WORKER	20%	1,040	26	3%	191	0	0%
	25%	18,958	5,068	27%	5,385	3,039	56%
	30%	44,718	13,024	29%	7,106	3,052	43%
LABORER AND RELATED CLASSIFICATIONS	20%	262,858	95,216	36%	30,015	24,774	83%
	25%	224,507	93,054	41%	23,491	18,077	77%
	30%	1,368,739	645,769	47%	132,128	92,046	70%
OPERATING ENGINEER	20%	69,117	30,399	44%	2,166	2,122	98%
	25%	62,865	24,883	40%	1,417	1,380	97%
	30%	329,912	179,404	54%	13,055	7,058	54%
PAINTER	20%	349	14	4%	41	0	0%
	25%	28,651	3,460	12%	7,111	2,139	30%
	30%	50,570	8,705	17%	10,729	3,644	34%
PLUMBER	20%	5,235	1,065	20%	632	335	53%
	25%	6,146	2,475	40%	1,262	1,197	95%
	30%	56,847	28,084	49%	10,081	4,794	48%
ROOFER	20%	76	6	8%	31	6	19%
	25%	3,935	1,173	30%	1,414	114	8%
	30%	17,984	7,702	43%	4,754	1,670	35%
SHEET METAL WORKER	20%	7,999	379	5%	973	0	0%
	25%	1,647	828	50%	188	134	71%
	30%	26,078	7,502	29%	5,330	1,681	32%
OTHER TRADES *	20%	31,174	8,494	27%	1,077	906	84%
	25%	49,988	14,938	30%	1,899	1,103	58%
	30%	185,303	53,863	29%	8,249	2,767	34%

\*Other Trades: Asbestos Worker, Heat And Frost Insulator, Boilermaker, Brick Tender, Bricklayer/Blocklayer, Building/Construction Inspector And Field Soils And Material Tester, Carpet, Linoleum, Resilient Tile Layer, Carpet, Linoleum, Soft Floor Layer, Driver, Electrical Utility Lineman, Field Surveyor, Landscape Maintenance Laborer, Metal Roofing Systems Installer, Modular Furniture Installer, Mover, Pile Driver, Plasterer, Slurry Seal Worker, Steel Erector and Fabricator, Teamster, Telecommunications Technician, Terrazzo Finisher, Terrazzo Worker, Tile Finisher, Tile Setter, Tunnel Worker and Water Well Driller



WORK HOURS REPORTED

REQUIREMENT	NUMBER OF PROJECTS	TOTAL HOURS			APPRENTICE HOURS		
		Total	Local	Local %	Total	Total	Local %
20%	25	229,358	91,870	40%	18,645	12,601	68%
25%	38	2,644,977	641,001	24%	467,781	175,032	37%
30%	252	2,948,547	1,093,161	37%	394,768	207,046	52%
<b>TOTAL</b>	<b>315</b>	<b>5,822,882</b>	<b>1,826,032</b>	<b>31%</b>	<b>881,194</b>	<b>394,679</b>	<b>45%</b>

WORK HOURS BY TRADE

TRADE	REQUIREMENT	TOTAL HOURS			APPRENTICE HOURS		
		Total	Local	Local %	Total	Local	Local %
ASBESTOS REMOVAL WORKER	20%	9,827	2,822	29%	0	0	0%
	25%	53,940	10,777	20%	0	0	0%
	30%	23,536	2,415	10%	0	0	0%
CARPENTER AND RELATED TRADES	20%	8,482	4,758	56%	244	232	95%
	25%	187,854	53,631	29%	30,279	12,661	42%
	30%	214,376	74,892	35%	44,062	20,584	47%
CEMENT MASON	20%	15,997	7,733	48%	3,267	3,238	99%
	25%	54,495	9,637	18%	7,178	4,026	56%
	30%	218,322	85,145	39%	45,184	21,450	47%
DRYWALL INSTALLER/LATHER	20%	535	0	0%	0	0	0%
	25%	124,675	18,883	15%	21,762	4,977	23%
	30%	74,161	18,179	25%	12,955	5,568	43%
ELECTRICIAN	20%	8,943	4,277	48%	955	681	71%
	25%	245,447	66,310	27%	56,376	27,730	49%
	30%	170,497	64,727	38%	38,930	24,857	64%
GLAZIER	20%	108	0	0%	15	0	0%
	25%	32,390	8,271	26%	7,686	3,847	50%
	30%	8,872	2,929	33%	3,281	1,820	55%
IRON WORKER	20%	378	146	39%	99	32	32%
	25%	205,902	66,833	32%	58,637	29,485	50%
	30%	95,355	28,473	30%	33,209	8,912	27%
LABORER AND RELATED CLASSIFICATIONS	20%	142,443	59,561	42%	12,646	7,800	62%
	25%	571,157	197,338	35%	39,590	24,453	62%
	30%	1,427,963	577,964	40%	136,755	90,197	66%
OPERATING ENGINEER	20%	14,216	5,577	39%	260	228	88%
	25%	104,415	28,202	27%	6,076	4,383	72%
	30%	318,233	141,320	44%	16,197	12,700	78%
PAINTER	20%	766	344	45%	8	8	100%
	25%	63,656	6,952	11%	7,644	574	8%
	30%	28,198	13,234	47%	2,849	2,079	73%
PLUMBER	20%	2,800	640	23%	399	16	4%
	25%	135,756	35,291	26%	46,896	19,559	42%
	30%	77,119	25,913	34%	21,971	9,718	44%
ROOFER	20%	3,576	275	8%	477	275	58%
	25%	49,677	7,410	15%	14,648	2,997	20%
	30%	48,413	9,672	20%	16,393	3,990	24%
SHEET METAL WORKER	20%	2,193	634	29%	84	0	0%
	25%	81,543	16,741	21%	24,553	10,835	44%
	30%	39,769	10,085	25%	9,429	1,372	15%
OTHER TRADES *	20%	19,095	5,104	27%	192	92	48%
	25%	187,326	23,627	13%	41,065	5,204	13%
	30%	184,686	36,411	20%	10,217	3,200	31%

\*Other Trades: Asbestos Worker, Heat And Frost Insulator, Brick Tender, Bricklayer, Blocklayer, Building/Construction Inspector And Field Soils And Material Tester, Driver, Electrical Utility Lineman, Elevator Constructor, Field Surveyor, Marble Finisher, Marble Mason, Modular Furniture Installer, Parking And Highway Improvement, Parking And Highway Improvement Painter, Roofer, Steel Erector And Fabricator, Teamster, Telecommunications Technician, Terrazzo Finisher, Terrazzo Worker, Tile Finisher, Tile Setter, Traffic Control/Lane Closure and Water Well Driller.



WORK HOURS REPORTED

REQUIREMENT	NUMBER OF PROJECTS	TOTAL HOURS			APPRENTICE HOURS		
		Total	Local	Local %	Total	Total	Local %
20%	8	192,480	63,241	33%	20,781	13,425	65%
25%	7	73,984	32,725	44%	6,659	3,608	54%
30%	48	506,064	210,532	42%	51,420	29,298	57%
<b>TOTAL</b>	<b>63</b>	<b>772,528</b>	<b>306,498</b>	<b>40%</b>	<b>78,860</b>	<b>46,331</b>	<b>59%</b>

WORK HOURS BY TRADE

TRADE	REQUIREMENT	TOTAL HOURS			APPRENTICE HOURS		
		Total	Local	Local %	Total	Local	Local %
ASBESTOS REMOVAL WORKER	20%	4,418	275	6%	0	0	0%
	25%	431	11	3%	0	0	0%
	30%	19,141	744	4%	0	0	0%
CARPENTER AND RELATED TRADES	20%	31,768	16,829	53%	6,760	3,210	47%
	25%	18,690	12,959	69%	1,620	724	45%
	30%	93,634	59,422	63%	13,705	11,092	81%
CEMENT MASON	20%	10,036	1,624	16%	12	0	0%
	25%	6,395	2,644	41%	424	424	100%
	30%	19,701	9,610	49%	555	374	67%
DRYWALL INSTALLER/LATHER	20%	2,050	291	14%	509	147	29%
	25%	359	192	53%	0	0	0%
	30%	3,532	1,237	35%	98	58	59%
ELECTRICIAN	20%	8,967	4,746	53%	1,045	501	48%
	25%	2,206	1,068	48%	283	225	79%
	30%	25,678	15,364	60%	8,426	4,928	58%
GLAZIER	20%	2,736	257	9%	308	0	0%
	25%	396	22	5%	55	0	0%
	30%	4,091	394	10%	1,481	330	22%
IRON WORKER	20%	8,703	3,224	37%	429	125	29%
	25%	3,326	900	27%	72	40	56%
	30%	17,701	6,425	36%	1,570	905	58%
LABORER AND RELATED CLASSIFICATIONS	20%	84,809	25,008	29%	7,856	7,164	91%
	25%	26,670	10,055	38%	2,335	1,496	64%
	30%	206,821	76,103	37%	14,895	8,149	55%
OPERATING ENGINEER	20%	13,713	4,247	31%	1,623	673	41%
	25%	5,247	1,616	31%	232	77	33%
	30%	48,306	18,025	37%	1,668	256	15%
PAINTER	20%	4,948	1,889	38%	480	325	68%
	25%	712	422	59%	0	0	0%
	30%	10,656	5,747	54%	124	44	35%
PLUMBER	20%	4,973	2,185	44%	880	880	100%
	25%	688	396	58%	45	45	100%
	30%	11,229	6,328	56%	1,282	783	61%
ROOFER	20%	2,485	427	17%	667	276	41%
	25%	2,364	301	13%	695	189	27%
	30%	6,146	2,382	39%	2,001	867	43%
SHEET METAL WORKER	20%	2,028	436	21%	58	19	32%
	25%	165	104	63%	59	0	0%
	30%	3,504	870	25%	782	253	32%
OTHER TRADES *	20%	10,849	1,806	17%	157	108	69%
	25%	6,337	2,037	32%	842	390	46%
	30%	33,624	7,583	23%	4,402	1,180	27%

\*Other Trades: Asbestos Worker, Heat And Frost Insulator, Brick Tender, Bricklayer/Blocklayer, Carpet, Linoleum, Soft Floor Layer, Driver, Electrical Utility Lineman, Elevator Constructor, Field Surveyor, Landscape Maintenance Laborer, Metal Roofing Systems Installer, Modular Furniture Installer, Parking And Highway Improvement Painter, Pile Driver, Plasterer, Slurry Seal Worker, Teamster, Terrazzo Finisher, Terrazzo Worker, Tile Finisher, Tile Setter, Tree Trimmer, and Water Well Driller.

**“The Local Hiring Policy is an example of what our city can do when we invest in our residents.”**

- Mayor London Breed





# THE OFFICE OF ECONOMIC AND WORKFORCE DEVELOPMENT WOULD LIKE TO THANK OUR PARTNERS FOR THEIR CONTINUED SUPPORT

## THE OFFICE OF MAYOR LONDON N. BREED

### SAN FRANCISCO BOARD OF SUPERVISORS

Sandra Lee Fewer, District 1

Catherine Stefani, District 2

Aaron Peskin, District 3

Gordon Mar, District 4

Vallie Brown, District 5

Matt Haney, District 6

Norman Yee, District 7

Rafael Mandelman, District 8

Hillary Ronen, District 9

Shamann Walton, District 10

Ahsha Safai, District 11

### CITY & COUNTY OF SAN FRANCISCO CITY AGENCIES

Office of the City Administrator

Office of the City Attorney

Office of the Controller

Port of San Francisco

San Francisco Adult Probation Department

San Francisco International Airport

San Francisco Municipal Transportation Agency

San Francisco Public Utilities Commission

San Francisco Public Works

San Francisco Recreation and Parks

### LABOR ORGANIZATIONS

Bricklayers, Tilesetters and Allied Craftworkers Local 3

Carpenters Local 22

Cement Masons Local 300

Drywall Lathers Local 68L

International Brotherhood of Electrical Workers Local 6

International Union of Painters and Allied Trades District Council 16

Ironworkers Local 377

Laborers' Local 261

Northern California Carpenters Regional Council

Northern California District Council of Laborers

Operating Engineers Local 3

Pile Drivers Local 34

Plasterers and Shophands Union Local 66

Roofers and Waterproofers Local 40

Sheet Metal Workers' Local 104

United Association Local 38, Plumbers & Pipefitters

### CONTRACTOR ASSOCIATIONS

Associated General Contractors

Construction Employers' Association

United Contractors

Wall and Ceiling Alliance

### COMMUNITY ORGANIZATIONS

A. Philip Randolph Institute

Anders and Anders Foundation

Arriba Juntos

Asian Neighborhood Design

Black To The Future

Brightline Defense Project

Brothers Against Guns

Charity Cultural Services Center

Chinese for Affirmative Action

Inner City Youth

Mission Hiring Hall

One Treasure Island

Roadmap To Peace

San Francisco Conservation Corps

Success Center of San Francisco

Together United Recommitted Forever (T.U.R.F.)

United Playaz

Young Community Developers, Inc.

### THE MAYOR'S CONSTRUCTION WORKFORCE ADVISORY COMMITTEE

In July 2012, Mayor Lee established the Committee to evaluate the impact of the San Francisco Local Hiring Policy for Construction. Stakeholders in the local construction industry are represented by twelve committee members from local construction companies, trade unions, community organizations, and City departments.

### PHOTOGRAPHY

Robert J. Pierce, SFMTA, Central Subway, [www.flickr.com/photos/municentralsubway](http://www.flickr.com/photos/municentralsubway) (all photos unless otherwise noted)

Robin Scheswohl, San Francisco Public Utilities Commission (pg 16, bottom right)

San Francisco Public Works (pgs 13-14)

CityBuild (cover, pg 7, 15, 17, 18)

Printed by ReproMail





2019 SAN FRANCISCO LOCAL HIRING POLICY FOR CONSTRUCTION  
ANNUAL REPORT TO THE SAN FRANCISCO BOARD OF SUPERVISORS

**From:** [Board of Supervisors. \(BOS\)](#)  
**To:** [BOS-Supervisors](#)  
**Subject:** FW: CCSF Monthly Pooled Investment Report for December 2019  
**Date:** Wednesday, January 15, 2020 10:17:00 AM  
**Attachments:** [CCSF Monthly Pooled Investment Report for December 2019.pdf](#)

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**From:** Dion, Ichieh (TTX) <ichieh.dion@sfgov.org>  
**Sent:** Wednesday, January 15, 2020 8:08 AM  
**To:** Dion, Ichieh (TTX) <ichieh.dion@sfgov.org>  
**Subject:** CCSF Monthly Pooled Investment Report for December 2019

All-

Please find the CCSF Pooled Investment Report for the month of December attached for your use.

Regards,

Ichieh Dion  
City and County of San Francisco  
1 Dr. Carlton B. Goodlett Place, Room 140  
San Francisco, CA 94102  
415-554-5433

Office of the Treasurer & Tax Collector  
City and County of San Francisco



José Cisneros, Treasurer

Tajel Shah, Chief Assistant Treasurer  
Robert L. Shaw, CFA, Chief Investment Officer

Investment Report for the month of December 2019

January 15, 2020

**The Honorable London N. Breed**  
Mayor of San Francisco  
City Hall, Room 200  
1 Dr. Carlton B. Goodlett Place  
San Francisco, CA 94102-4638

**The Honorable Board of Supervisors**  
City and County of San Francisco  
City Hall, Room 244  
1 Dr. Carlton B. Goodlett Place  
San Francisco, CA 94102-4638

Colleagues,

In accordance with the provisions of California State Government Code, Section 53646, we forward this report detailing the City's pooled fund portfolio as of December 31, 2019. These investments provide sufficient liquidity to meet expenditure requirements for the next six months and are in compliance with our statement of investment policy and California Code.

This correspondence and its attachments show the investment activity for the month of December 2019 for the portfolios under the Treasurer's management. All pricing and valuation data is obtained from Interactive Data Corporation.

**CCSF Pooled Fund Investment Earnings Statistics \***

<i>(in \$ million)</i>	Current Month		Prior Month	
	Fiscal YTD	December 2019	Fiscal YTD	November 2019
Average Daily Balance	\$ 11,226	\$ 12,326	\$ 11,004	\$ 11,432
Net Earnings	125.56	21.18	104.37	20.04
Earned Income Yield	2.22%	2.02%	2.26%	2.13%

**CCSF Pooled Fund Statistics \***

<i>(in \$ million)</i>	% of Portfolio	Book Value	Market Value	Wtd. Avg. Coupon	Wtd. Avg. YTM	WAM
<b>Investment Type</b>						
U.S. Treasuries	15.01%	\$ 1,866.7	\$ 1,869.8	1.96%	1.83%	470
Federal Agencies	41.75%	5,180.0	5,200.7	2.04%	2.09%	764
State & Local Government						
Agency Obligations	0.65%	80.3	81.1	2.11%	2.30%	394
Public Time Deposits	0.28%	35.0	35.0	1.69%	1.69%	141
Negotiable CDs	21.89%	2,724.5	2,726.4	2.18%	2.18%	134
Commercial Paper	8.41%	1,044.0	1,048.2	0.00%	1.96%	128
Medium Term Notes	0.20%	25.0	25.1	2.37%	2.41%	84
Money Market Funds	5.55%	691.7	691.7	1.54%	1.54%	1
Supranationals	6.25%	772.3	778.5	1.37%	2.12%	228
<b>Totals</b>	<b>100.0%</b>	<b>\$ 12,419.5</b>	<b>\$ 12,456.6</b>	<b>1.81%</b>	<b>2.03%</b>	<b>447</b>

In the remainder of this report, we provide additional information and analytics at the security-level and portfolio-level, as recommended by the California Debt and Investment Advisory Commission.

Respectfully,

**José Cisneros**  
Treasurer

cc: Treasury Oversight Committee: Aimee Brown, Kevin Kone, Eric Sandler, Meghan Wallace  
Ben Rosenfield - Controller, Office of the Controller  
Tonia Lediju, Ph.D. - Chief Audit Executive, Office of the Controller  
Mayor's Office of Public Policy and Finance  
San Francisco County Transportation Authority  
San Francisco Public Library  
San Francisco Health Service System

# Portfolio Summary

## Pooled Fund

As of December 31, 2019

<i>(in \$ million)</i>							
<b>Security Type</b>	<b>Par Value</b>	<b>Book Value</b>	<b>Market Value</b>	<b>Market/Book Price</b>	<b>Current % Allocation</b>	<b>Max. Policy Allocation</b>	<b>Compliant?</b>
U.S. Treasuries	\$ 1,860.0	\$ 1,866.7	\$ 1,869.8	100.17	15.01%	100%	Yes
Federal Agencies	5,183.2	5,180.0	5,200.7	100.40	41.75%	100%	Yes
State & Local Government							
Agency Obligations	80.7	80.3	81.1	101.05	0.65%	20%	Yes
Public Time Deposits	35.0	35.0	35.0	100.00	0.28%	100%	Yes
Negotiable CDs	2,724.3	2,724.5	2,726.4	100.07	21.89%	30%	Yes
Bankers Acceptances	-	-	-	-	0.00%	40%	Yes
Commercial Paper	1,055.0	1,044.0	1,048.2	100.40	8.41%	25%	Yes
Medium Term Notes	25.0	25.0	25.1	100.33	0.20%	25%	Yes
Repurchase Agreements	-	-	-	-	0.00%	10%	Yes
Reverse Repurchase/ Securities Lending Agreements	-	-	-	-	0.00%	\$75mm	Yes
Money Market Funds - Government	691.7	691.7	691.7	100.00	5.55%	20%	Yes
LAIF	-	-	-	-	0.00%	\$50mm	Yes
Supranationals	777.1	772.3	778.5	100.81	6.25%	30%	Yes
<b>TOTAL</b>	<b>\$ 12,432.1</b>	<b>\$ 12,419.5</b>	<b>\$ 12,456.6</b>	<b>100.30</b>	<b>100.00%</b>	<b>-</b>	<b>Yes</b>

The City and County of San Francisco uses the following methodology to determine compliance: Compliance is pre-trade and calculated on both a par and market value basis, using the result with the lowest percentage of the overall portfolio value. Cash balances are included in the City's compliance calculations.

Please note the information in this report does not include cash balances. Due to fluctuations in the market value of the securities held in the Pooled Fund and changes in the City's cash position, the allocation limits may be exceeded on a post-trade compliance basis. In these instances, no compliance violation has occurred, as the policy limits were not exceeded prior to trade execution. The full Investment Policy can be found at <https://sftreasurer.org/investments>

Totals may not add due to rounding.

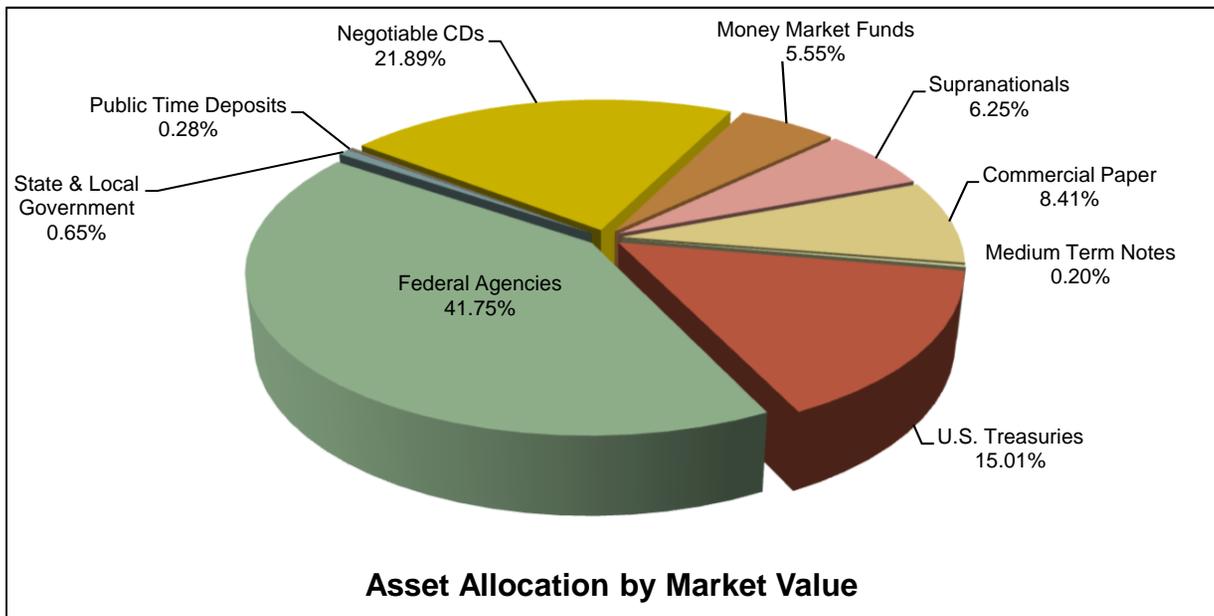
# City and County of San Francisco

## Pooled Fund Portfolio Statistics

For the month ended December 31, 2019

Average Daily Balance	\$12,325,611,742
Net Earnings	\$21,182,732
Earned Income Yield	2.02%
Weighted Average Maturity	447 days

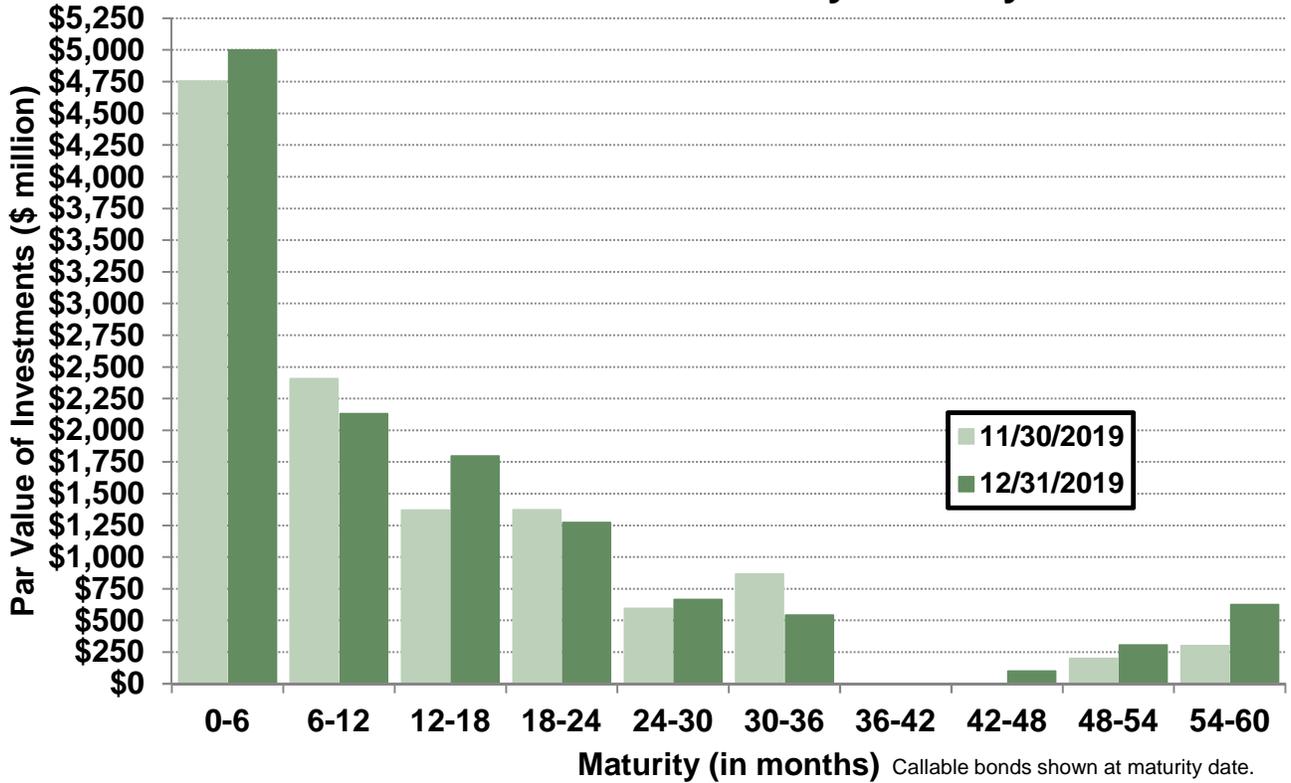
Investment Type	(\$ million)	Par Value	Book Value	Market Value
U.S. Treasuries		\$ 1,860.0	\$ 1,866.7	\$ 1,869.8
Federal Agencies		5,183.2	5,180.0	5,200.7
State & Local Government				
Agency Obligations		80.7	80.3	81.1
Public Time Deposits		35.0	35.0	35.0
Negotiable CDs		2,724.3	2,724.5	2,726.4
Commercial Paper		1,055.0	1,044.0	1,048.2
Medium Term Notes		25.0	25.0	25.1
Money Market Funds		691.7	691.7	691.7
Supranationals		777.1	772.3	778.5
<b>Total</b>		<b>\$ 12,432.1</b>	<b>\$ 12,419.5</b>	<b>\$ 12,456.6</b>



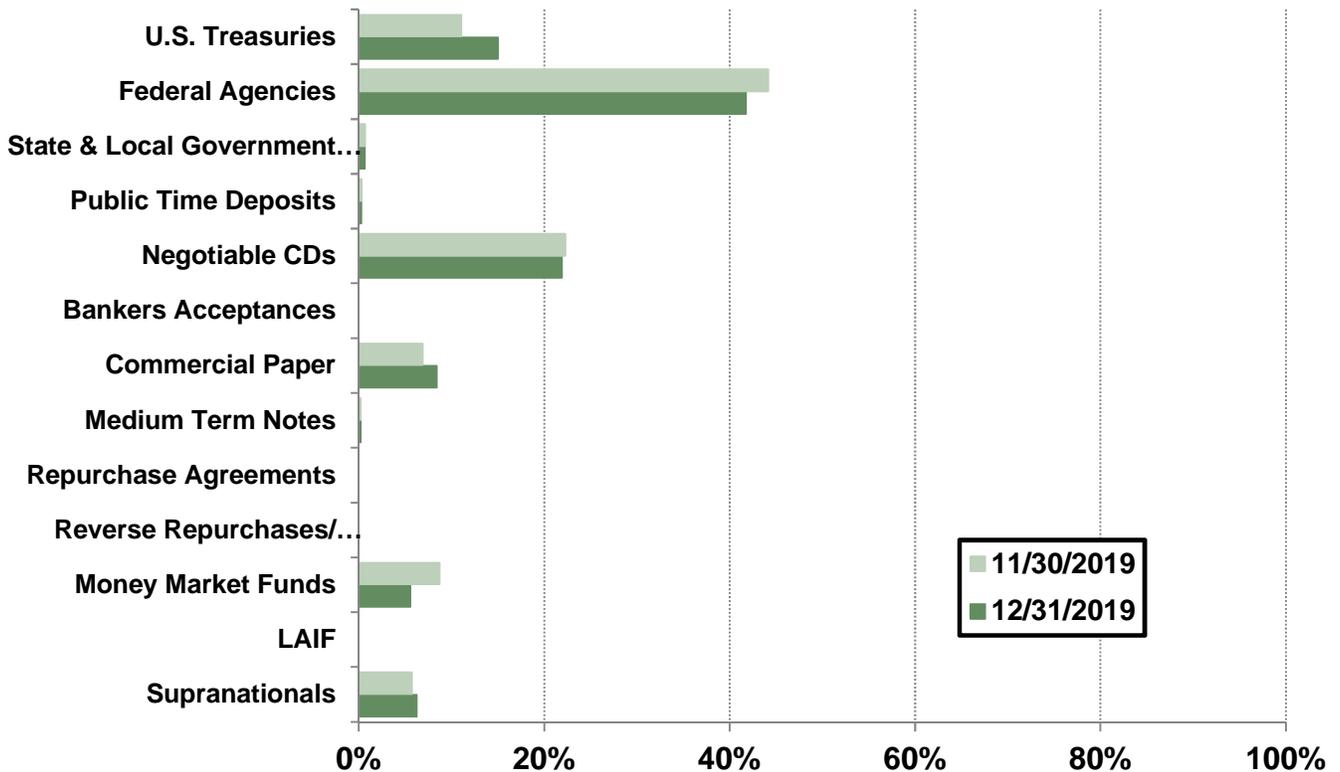
# Portfolio Analysis

## Pooled Fund

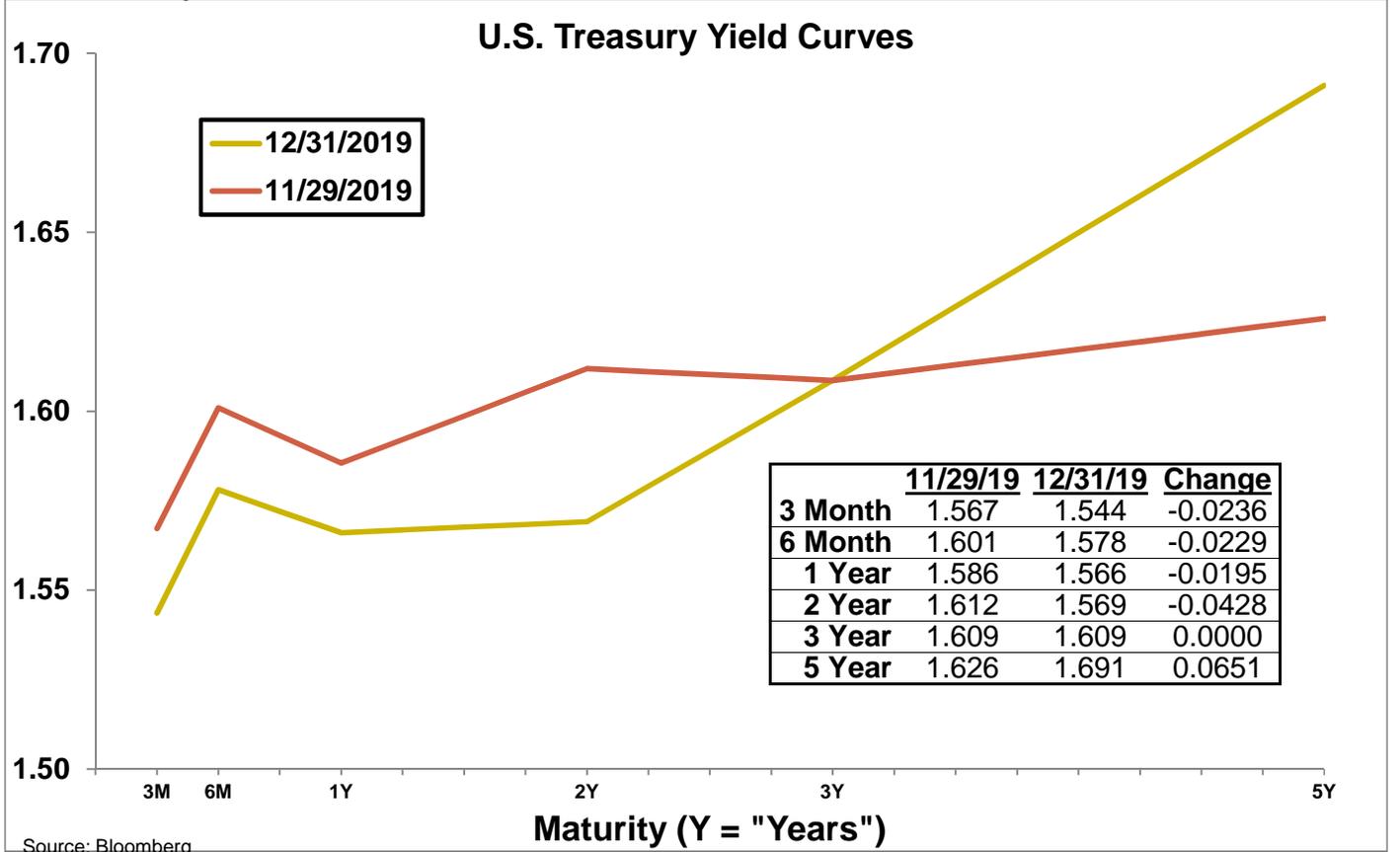
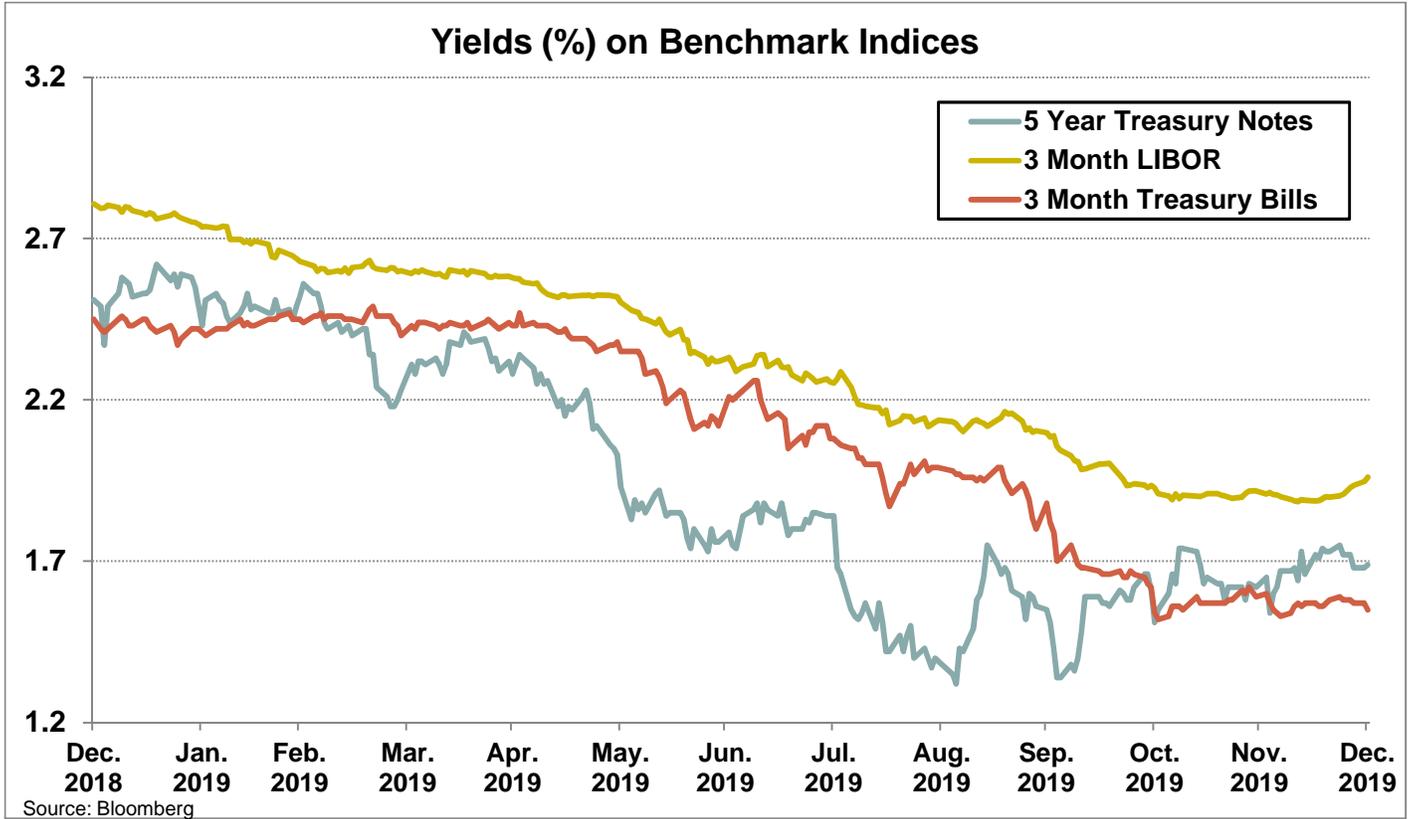
### Par Value of Investments by Maturity



### Asset Allocation by Market Value



# Yield Curves



# Investment Inventory

## Pooled Fund

As of December 31, 2019

Type of Investment	CUSIP	Issuer Name	Maturity		Coupon	Par Value	Book Value	Amortized		Market Value
			Settle Date	Date				Book Value	Market Value	
U.S. Treasuries	912796TM1	TREASURY BILL	10/3/2019	4/2/2020	0.00	\$ 50,000,000	\$ 49,548,792	\$ 49,771,917	\$ 49,807,500	
U.S. Treasuries	912828XU9	US TREASURY	6/20/2017	6/15/2020	1.50	50,000,000	49,982,422	49,997,325	49,982,500	
U.S. Treasuries	912828XU9	US TREASURY	4/3/2019	6/15/2020	1.50	50,000,000	49,478,516	49,802,810	49,982,500	
U.S. Treasuries	912828XU9	US TREASURY	12/20/2018	6/15/2020	1.50	100,000,000	98,312,500	99,484,116	99,965,000	
U.S. Treasuries	912828XY1	US TREASURY	4/3/2019	6/30/2020	2.50	50,000,000	50,070,313	50,028,032	50,211,000	
U.S. Treasuries	9128285B2	US TREASURY	10/1/2019	9/30/2020	2.75	60,000,000	60,557,633	60,413,707	60,483,000	
U.S. Treasuries	9128282Z2	US TREASURY	11/20/2019	10/15/2020	1.63	50,000,000	50,079,918	50,000,000	49,994,000	
U.S. Treasuries	9128283L2	US TREASURY	11/18/2019	12/15/2020	1.88	50,000,000	50,128,906	50,114,474	50,109,500	
U.S. Treasuries	9128283L2	US TREASURY	11/26/2019	12/15/2020	1.88	50,000,000	50,119,141	50,108,000	50,109,500	
U.S. Treasuries	912828N48	US TREASURY	11/22/2019	12/31/2020	1.75	50,000,000	50,058,594	50,052,807	50,047,000	
U.S. Treasuries	9128283Q1	US TREASURY	3/4/2019	1/15/2021	2.00	50,000,000	49,486,328	49,714,209	50,185,500	
U.S. Treasuries	9128283Q1	US TREASURY	11/18/2019	1/15/2021	2.00	50,000,000	50,553,329	50,189,048	50,185,500	
U.S. Treasuries	9128283Q1	US TREASURY	11/22/2019	1/15/2021	2.00	50,000,000	50,562,245	50,189,081	50,185,500	
U.S. Treasuries	9128283Q1	US TREASURY	12/3/2019	1/15/2021	2.00	50,000,000	50,558,933	50,163,318	50,185,500	
U.S. Treasuries	9128284B3	US TREASURY	11/22/2019	3/15/2021	2.38	50,000,000	50,694,497	50,433,186	50,435,500	
U.S. Treasuries	9128284B3	US TREASURY	12/6/2019	3/15/2021	2.38	50,000,000	50,716,732	50,424,101	50,435,500	
U.S. Treasuries	912828C57	US TREASURY	4/15/2019	3/31/2021	2.25	50,000,000	49,863,281	49,913,119	50,381,000	
U.S. Treasuries	9128284G2	US TREASURY	4/9/2019	4/15/2021	2.38	50,000,000	50,013,672	50,008,719	50,482,500	
U.S. Treasuries	9128284G2	US TREASURY	12/9/2019	4/15/2021	2.38	50,000,000	50,641,340	50,441,295	50,482,500	
U.S. Treasuries	9128284G2	US TREASURY	12/11/2019	4/15/2021	2.38	50,000,000	50,641,970	50,437,484	50,482,500	
U.S. Treasuries	9128284T4	US TREASURY	11/26/2019	6/15/2021	2.63	50,000,000	50,732,422	50,685,919	50,726,500	
U.S. Treasuries	9128284T4	US TREASURY	11/27/2019	6/15/2021	2.63	50,000,000	50,744,141	50,698,125	50,726,500	
U.S. Treasuries	9128284T4	US TREASURY	12/11/2019	6/15/2021	2.63	50,000,000	50,697,266	50,670,739	50,726,500	
U.S. Treasuries	9128284T4	US TREASURY	12/18/2019	6/15/2021	2.63	50,000,000	50,725,602	50,696,481	50,726,500	
U.S. Treasuries	9128287A2	US TREASURY	11/8/2019	6/30/2021	1.63	50,000,000	49,933,594	49,939,570	50,019,500	
U.S. Treasuries	9128287A2	US TREASURY	12/3/2019	6/30/2021	1.63	50,000,000	49,968,750	49,970,326	50,019,500	
U.S. Treasuries	9128287A2	US TREASURY	12/9/2019	6/30/2021	1.63	50,000,000	49,978,516	49,979,384	50,019,500	
U.S. Treasuries	912828S27	US TREASURY	8/15/2017	6/30/2021	1.13	25,000,000	24,519,531	24,814,604	24,825,250	
U.S. Treasuries	912828Y20	US TREASURY	12/12/2019	7/15/2021	2.63	50,000,000	51,263,502	50,703,438	50,777,500	
U.S. Treasuries	912828YC8	US TREASURY	12/9/2019	8/31/2021	1.50	50,000,000	50,071,278	49,870,147	49,922,000	
U.S. Treasuries	912828T34	US TREASURY	12/11/2019	9/30/2021	1.13	50,000,000	49,608,703	49,514,042	49,597,500	
U.S. Treasuries	912828T67	US TREASURY	11/10/2016	10/31/2021	1.25	50,000,000	49,574,219	49,843,146	49,699,000	
U.S. Treasuries	912828U65	US TREASURY	12/13/2016	11/30/2021	1.75	100,000,000	99,312,500	99,734,935	100,309,000	
U.S. Treasuries	912828U81	US TREASURY	11/22/2019	12/31/2021	2.00	50,000,000	50,402,344	50,381,443	50,400,500	
U.S. Treasuries	912828XW5	US TREASURY	8/15/2017	6/30/2022	1.75	25,000,000	24,977,539	24,988,505	25,103,500	
U.S. Treasuries	912828WE6	US TREASURY	12/17/2019	11/15/2023	2.75	50,000,000	52,081,817	51,940,354	52,041,000	
<b>Subtotals</b>					<b>1.96</b>	<b>\$ 1,860,000,000</b>	<b>\$ 1,866,660,783</b>	<b>\$ 1,866,117,904</b>	<b>\$ 1,869,772,750</b>	
Federal Agencies	3136G4KQ5	FANNIE MAE	11/17/2017	1/17/2020	1.65	\$ 1,000,000	\$ 996,070	\$ 999,921	\$ 1,000,000	
Federal Agencies	3136G4KQ5	FANNIE MAE	11/17/2017	1/17/2020	1.65	31,295,000	31,172,011	31,292,512	31,295,000	
Federal Agencies	3133EJLU1	FEDERAL FARM CREDIT BANK	4/24/2018	1/24/2020	2.42	25,000,000	24,996,500	24,999,874	25,013,250	
Federal Agencies	3133EJLU1	FEDERAL FARM CREDIT BANK	4/24/2018	1/24/2020	2.42	25,000,000	24,995,700	24,999,845	25,013,250	
Federal Agencies	313384SK6	FED HOME LN DISCOUNT NT	11/19/2019	1/29/2020	0.00	33,375,000	33,271,658	33,334,245	33,337,286	
Federal Agencies	313384SK6	FED HOME LN DISCOUNT NT	9/30/2019	1/29/2020	0.00	50,000,000	49,690,778	49,928,444	49,943,500	
Federal Agencies	3130ADN32	FEDERAL HOME LOAN BANK	2/9/2018	2/11/2020	2.13	50,000,000	49,908,500	49,994,875	50,026,500	
Federal Agencies	313378J77	FEDERAL HOME LOAN BANK	5/17/2017	3/13/2020	1.88	15,710,000	15,843,849	15,719,347	15,716,598	
Federal Agencies	3133EHZN6	FEDERAL FARM CREDIT BANK	9/20/2017	3/20/2020	1.45	20,000,000	19,979,400	19,998,216	19,998,800	
Federal Agencies	3133EJHL6	FEDERAL FARM CREDIT BANK	3/27/2018	3/27/2020	2.38	50,000,000	49,964,000	49,995,765	50,096,500	
Federal Agencies	3134GBET5	FREDDIE MAC	5/22/2018	4/13/2020	1.80	10,000,000	9,839,400	9,976,096	10,000,400	

# Investment Inventory

## Pooled Fund

Type of Investment	CUSIP	Issuer Name	Settle Date	Maturity		Par Value	Book Value	Amortized	
				Date	Coupon			Book Value	Market Value
Federal Agencies	3133EJG37	FEDERAL FARM CREDIT BANK	10/15/2018	4/15/2020	2.85	25,000,000	24,992,500	24,998,563	25,098,500
Federal Agencies	3136G4BL6	FANNIE MAE	10/17/2016	4/17/2020	1.25	15,000,000	15,000,000	15,000,000	14,984,850
Federal Agencies	3137EAEM7	FREDDIE MAC	4/19/2018	4/23/2020	2.50	35,000,000	34,992,300	34,998,816	35,093,450
Federal Agencies	3134GBBP2	FREDDIE MAC	5/30/2017	5/22/2020	1.70	15,750,000	15,750,000	15,750,000	15,753,938
Federal Agencies	3133EHNK5	FEDERAL FARM CREDIT BANK	6/15/2017	6/15/2020	1.54	25,000,000	24,997,500	24,999,621	24,997,000
Federal Agencies	3133EHNK5	FEDERAL FARM CREDIT BANK	6/15/2017	6/15/2020	1.54	26,900,000	26,894,620	26,899,185	26,896,772
Federal Agencies	3134GBST0	FREDDIE MAC	6/22/2017	6/22/2020	1.65	14,675,000	14,675,000	14,675,000	14,676,321
Federal Agencies	3134GBTX0	FREDDIE MAC	6/29/2017	6/29/2020	1.75	50,000,000	49,990,000	49,998,358	50,015,000
Federal Agencies	3133EHQB2	FEDERAL FARM CREDIT BANK	7/6/2017	7/6/2020	1.55	25,000,000	24,989,961	24,998,287	25,000,250
Federal Agencies	3130ABNV4	FEDERAL HOME LOAN BANK	7/13/2017	7/13/2020	1.75	50,000,000	50,000,000	50,000,000	50,001,000
Federal Agencies	3134GBXV9	FREDDIE MAC	7/13/2017	7/13/2020	1.85	50,000,000	50,000,000	50,000,000	49,995,500
Federal Agencies	3135G0T60	FANNIE MAE	8/1/2017	7/30/2020	1.50	50,000,000	49,848,500	49,970,780	49,953,500
Federal Agencies	3130ABZE9	FEDERAL HOME LOAN BANK	8/28/2017	8/28/2020	1.65	6,700,000	6,699,330	6,699,853	6,701,407
Federal Agencies	3130ABZN9	FEDERAL HOME LOAN BANK	8/28/2017	8/28/2020	1.80	25,000,000	25,000,000	25,000,000	25,006,000
Federal Agencies	3130ABZN9	FEDERAL HOME LOAN BANK	8/28/2017	8/28/2020	1.80	50,000,000	50,000,000	50,000,000	50,012,000
Federal Agencies	3130ADT93	FEDERAL HOME LOAN BANK	3/14/2018	9/14/2020	2.40	25,000,000	24,984,458	24,995,635	25,130,000
Federal Agencies	3133EJ3N7	FEDERAL FARM CREDIT BANK	12/21/2018	9/21/2020	2.77	25,000,000	24,990,750	24,996,184	25,223,250
Federal Agencies	3130ACE26	FEDERAL HOME LOAN BANK	9/8/2017	9/28/2020	1.38	18,000,000	17,942,220	17,985,969	17,967,060
Federal Agencies	3130ACE26	FEDERAL HOME LOAN BANK	9/8/2017	9/28/2020	1.38	30,000,000	29,903,700	29,976,615	29,945,100
Federal Agencies	3130ACK52	FEDERAL HOME LOAN BANK	3/12/2018	10/5/2020	1.70	25,530,000	25,035,101	25,383,324	25,539,191
Federal Agencies	3133EKR57	FEDERAL FARM CREDIT BANK	9/25/2019	10/20/2020	1.80	112,500,000	112,450,838	112,463,160	112,549,500
Federal Agencies	3132X0KR1	FARMER MAC	11/2/2016	11/2/2020	1.91	25,000,000	25,000,000	25,000,000	25,032,750
Federal Agencies	3132X0ZF1	FARMER MAC	11/13/2017	11/9/2020	1.93	12,000,000	11,970,000	11,991,401	12,012,480
Federal Agencies	3133EJT90	FEDERAL FARM CREDIT BANK	11/16/2018	11/16/2020	2.95	50,000,000	49,947,835	49,977,164	50,612,500
Federal Agencies	3137EAEK1	FREDDIE MAC	11/15/2017	11/17/2020	1.88	50,000,000	49,952,000	49,985,967	50,098,000
Federal Agencies	3134GBX56	FREDDIE MAC	11/24/2017	11/24/2020	2.25	60,000,000	60,223,200	60,066,797	60,315,000
Federal Agencies	3134GBLR1	FREDDIE MAC	5/25/2017	11/25/2020	1.75	24,715,000	24,712,529	24,714,365	24,746,882
Federal Agencies	3133EHW58	FEDERAL FARM CREDIT BANK	11/27/2017	11/27/2020	1.90	25,000,000	24,992,629	24,997,774	25,073,250
Federal Agencies	3133EHW58	FEDERAL FARM CREDIT BANK	11/27/2017	11/27/2020	1.90	25,000,000	24,992,629	24,997,774	25,073,250
Federal Agencies	3130A3UQ5	FEDERAL HOME LOAN BANK	12/13/2017	12/11/2020	1.88	10,000,000	9,957,600	9,986,629	10,021,300
Federal Agencies	3132X0ZY0	FARMER MAC	12/15/2017	12/15/2020	2.05	12,750,000	12,741,458	12,747,280	12,784,298
Federal Agencies	3133EGX75	FEDERAL FARM CREDIT BANK	12/21/2016	12/21/2020	1.98	50,000,000	50,000,000	50,000,000	50,090,500
Federal Agencies	3133EFTX5	FEDERAL FARM CREDIT BANK	12/24/2015	12/24/2020	2.11	100,000,000	100,000,000	100,000,000	100,317,000
Federal Agencies	3133EJ4Q9	FEDERAL FARM CREDIT BANK	1/11/2019	1/11/2021	2.55	100,000,000	99,934,000	99,966,052	100,996,000
Federal Agencies	3130AC2K9	FEDERAL HOME LOAN BANK	9/20/2017	2/10/2021	1.87	50,200,000	50,189,960	50,196,710	50,201,506
Federal Agencies	3133EJCE7	FEDERAL FARM CREDIT BANK	4/16/2018	2/12/2021	2.35	50,000,000	49,673,710	49,871,126	50,430,500
Federal Agencies	3137EAE19	FREDDIE MAC	2/16/2018	2/16/2021	2.38	22,000,000	21,941,920	21,978,167	22,188,540
Federal Agencies	3134GBD58	FREDDIE MAC	8/30/2017	2/26/2021	1.80	5,570,000	5,569,443	5,569,816	5,569,833
Federal Agencies	3133EKCS3	FEDERAL FARM CREDIT BANK	3/11/2019	3/11/2021	2.55	50,000,000	49,975,000	49,985,123	50,580,500
Federal Agencies	3133EKCS3	FEDERAL FARM CREDIT BANK	3/11/2019	3/11/2021	2.55	50,000,000	49,975,000	49,985,123	50,580,500
Federal Agencies	3133EKR99	FEDERAL FARM CREDIT BANK	10/3/2019	3/25/2021	1.90	90,000,000	89,982,000	89,985,006	90,088,200
Federal Agencies	3132X0Q53	FARMER MAC	3/29/2018	3/29/2021	2.60	6,350,000	6,343,079	6,347,139	6,427,534
Federal Agencies	3132X0Q53	FARMER MAC	3/29/2018	3/29/2021	2.60	20,450,000	20,427,710	20,440,787	20,699,695
Federal Agencies	3133EKFP6	FEDERAL FARM CREDIT BANK	4/5/2019	4/5/2021	2.23	25,000,000	24,916,500	24,947,456	25,207,500
Federal Agencies	3133EKFP6	FEDERAL FARM CREDIT BANK	4/5/2019	4/5/2021	2.23	25,000,000	24,917,500	24,948,085	25,207,500
Federal Agencies	3134GBJP8	FREDDIE MAC	11/16/2017	5/3/2021	1.89	22,000,000	21,874,600	21,951,586	22,002,200
Federal Agencies	3133EJNS4	FEDERAL FARM CREDIT BANK	5/22/2018	5/10/2021	2.70	17,700,000	17,653,095	17,678,581	17,970,102
Federal Agencies	3135G0U35	FANNIE MAE	6/25/2018	6/22/2021	2.75	25,000,000	24,994,250	24,997,170	25,422,750
Federal Agencies	3130ACQ98	FEDERAL HOME LOAN BANK	11/1/2017	7/1/2021	2.08	100,000,000	100,000,000	100,000,000	100,000,000
Federal Agencies	3134GBM25	FREDDIE MAC	10/2/2017	7/1/2021	1.92	50,000,000	50,000,000	50,000,000	50,000,000

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Federal Agencies	3130ACF33	FEDERAL HOME LOAN BANK	9/18/2017	9/13/2021	1.88	25,000,000	24,927,500	24,969,078	24,986,500
Federal Agencies	3134GUAEO	FREDDIE MAC	9/11/2019	9/13/2021	2.03	25,000,000	25,000,000	25,000,000	25,000,000
Federal Agencies	3134GUAEO	FREDDIE MAC	9/11/2019	9/13/2021	2.03	25,000,000	25,000,000	25,000,000	25,000,000
Federal Agencies	3134GUAEO	FREDDIE MAC	9/11/2019	9/13/2021	2.03	25,000,000	25,000,000	25,000,000	25,000,000
Federal Agencies	3134GUAEO	FREDDIE MAC	9/11/2019	9/13/2021	2.03	25,000,000	25,000,000	25,000,000	25,000,000
Federal Agencies	3134GUAX8	FREDDIE MAC	9/13/2019	9/13/2021	2.03	25,000,000	25,000,000	25,000,000	25,000,500
Federal Agencies	3134GUAX8	FREDDIE MAC	9/13/2019	9/13/2021	2.03	25,000,000	25,000,000	25,000,000	25,000,500
Federal Agencies	3134GUAX8	FREDDIE MAC	9/13/2019	9/13/2021	2.03	25,000,000	25,000,000	25,000,000	25,000,500
Federal Agencies	3134GUAX8	FREDDIE MAC	9/13/2019	9/13/2021	2.03	25,000,000	25,000,000	25,000,000	25,000,500
Federal Agencies	3130AH5D1	FEDERAL HOME LOAN BANK	9/23/2019	9/23/2021	2.05	100,000,000	100,000,000	100,000,000	100,092,000
Federal Agencies	3134GUGC8	FREDDIE MAC	10/9/2019	10/7/2021	2.00	33,680,000	33,683,742	33,680,000	33,680,000
Federal Agencies	3135G0Q89	FANNIE MAE	10/21/2016	10/7/2021	1.38	25,000,000	25,000,000	25,000,000	24,905,000
Federal Agencies	3133EJK24	FEDERAL FARM CREDIT BANK	10/19/2018	10/19/2021	3.00	25,000,000	24,980,900	24,988,550	25,632,750
Federal Agencies	3133EGZJ7	FEDERAL FARM CREDIT BANK	10/25/2016	10/25/2021	1.38	14,500,000	14,500,000	14,500,000	14,450,555
Federal Agencies	3133EGZJ7	FEDERAL FARM CREDIT BANK	10/25/2016	10/25/2021	1.38	15,000,000	15,000,000	15,000,000	14,948,850
Federal Agencies	3134GULE8	FREDDIE MAC	10/28/2019	10/28/2021	2.00	25,000,000	25,000,000	25,000,000	24,991,250
Federal Agencies	3134GULE8	FREDDIE MAC	10/28/2019	10/28/2021	2.00	85,675,000	85,675,000	85,675,000	85,645,014
Federal Agencies	3133EJT74	FEDERAL FARM CREDIT BANK	11/15/2018	11/15/2021	3.05	50,000,000	49,950,000	49,968,796	51,314,500
Federal Agencies	3130AHJY0	FEDERAL HOME LOAN BANK	11/8/2019	11/19/2021	1.63	17,000,000	16,970,930	16,973,046	17,020,570
Federal Agencies	3130AHJY0	FEDERAL HOME LOAN BANK	11/8/2019	11/19/2021	1.63	25,000,000	24,957,250	24,960,361	25,030,250
Federal Agencies	3130AHJY0	FEDERAL HOME LOAN BANK	11/8/2019	11/19/2021	1.63	25,000,000	24,957,250	24,960,361	25,030,250
Federal Agencies	3130AHJY0	FEDERAL HOME LOAN BANK	11/8/2019	11/19/2021	1.63	45,000,000	44,923,050	44,928,650	45,054,450
Federal Agencies	3130AHJY0	FEDERAL HOME LOAN BANK	11/8/2019	11/19/2021	1.63	50,000,000	49,914,500	49,920,722	50,060,500
Federal Agencies	3133EJ3B3	FEDERAL FARM CREDIT BANK	12/17/2018	12/17/2021	2.80	25,000,000	24,974,250	24,983,178	25,589,750
Federal Agencies	3133EJ3B3	FEDERAL FARM CREDIT BANK	12/17/2018	12/17/2021	2.80	25,000,000	24,974,250	24,983,178	25,589,750
Federal Agencies	3133EJ3B3	FEDERAL FARM CREDIT BANK	12/17/2018	12/17/2021	2.80	25,000,000	24,964,250	24,976,645	25,589,750
Federal Agencies	3130AHSR5	FEDERAL HOME LOAN BANK	12/20/2019	12/20/2021	1.63	22,500,000	22,475,700	22,476,099	22,509,225
Federal Agencies	3133EKAK2	FEDERAL FARM CREDIT BANK	2/19/2019	2/14/2022	2.53	20,700,000	20,682,612	20,687,648	21,101,580
Federal Agencies	3133EKBV7	FEDERAL FARM CREDIT BANK	3/1/2019	3/1/2022	2.55	10,000,000	9,997,186	9,997,972	10,202,300
Federal Agencies	313378WG2	FEDERAL HOME LOAN BANK	4/5/2019	3/11/2022	2.50	17,780,000	17,848,986	17,831,530	18,113,731
Federal Agencies	313378WG2	FEDERAL HOME LOAN BANK	4/5/2019	3/11/2022	2.50	40,000,000	40,158,360	40,118,289	40,750,800
Federal Agencies	3133EKDC7	FEDERAL FARM CREDIT BANK	4/8/2019	3/14/2022	2.47	26,145,000	26,226,050	26,205,768	26,637,049
Federal Agencies	3133EKDC7	FEDERAL FARM CREDIT BANK	4/8/2019	3/14/2022	2.47	45,500,000	45,634,680	45,600,979	46,356,310
Federal Agencies	3135G0T45	FANNIE MAE	6/6/2017	4/5/2022	1.88	25,000,000	25,072,250	25,033,790	25,161,000
Federal Agencies	3135G0V59	FANNIE MAE	4/12/2019	4/12/2022	2.25	25,000,000	24,918,000	24,937,752	25,374,000
Federal Agencies	3135G0V59	FANNIE MAE	4/12/2019	4/12/2022	2.25	50,000,000	49,836,000	49,875,504	50,748,000
Federal Agencies	3135G0V59	FANNIE MAE	4/12/2019	4/12/2022	2.25	50,000,000	49,836,000	49,875,504	50,748,000
Federal Agencies	3133EKHB5	FEDERAL FARM CREDIT BANK	4/18/2019	4/18/2022	2.35	50,000,000	49,969,500	49,976,680	50,843,500
Federal Agencies	3133EKLK5	FEDERAL FARM CREDIT BANK	5/16/2019	5/16/2022	2.25	25,000,000	24,949,250	24,959,900	25,376,750
Federal Agencies	3133EKLK5	FEDERAL FARM CREDIT BANK	5/16/2019	5/16/2022	2.25	35,000,000	34,928,950	34,943,860	35,527,450
Federal Agencies	3133EHLY7	FEDERAL FARM CREDIT BANK	6/6/2017	6/2/2022	1.88	50,000,000	50,059,250	50,028,714	50,323,500
Federal Agencies	3133EHLY7	FEDERAL FARM CREDIT BANK	6/9/2017	6/2/2022	1.88	50,000,000	49,997,500	49,998,786	50,323,500
Federal Agencies	3133ELDK7	FEDERAL FARM CREDIT BANK	12/16/2019	6/15/2022	1.63	20,000,000	19,998,940	19,998,959	20,013,600
Federal Agencies	3133ELDK7	FEDERAL FARM CREDIT BANK	12/16/2019	6/15/2022	1.63	25,000,000	24,998,676	24,998,699	25,017,000
Federal Agencies	3133ELDK7	FEDERAL FARM CREDIT BANK	12/16/2019	6/15/2022	1.63	25,000,000	24,998,676	24,998,699	25,017,000
Federal Agencies	3134GBN73	FREDDIE MAC	10/2/2017	7/1/2022	2.07	50,000,000	50,000,000	50,000,000	50,000,000
Federal Agencies	3134GUNR7	FREDDIE MAC	11/12/2019	8/12/2022	2.00	25,000,000	25,000,000	25,000,000	25,000,500
Federal Agencies	3134GUNR7	FREDDIE MAC	11/12/2019	8/12/2022	2.00	25,000,000	25,000,000	25,000,000	25,000,500
Federal Agencies	3134GUNR7	FREDDIE MAC	11/12/2019	8/12/2022	2.00	25,000,000	25,000,000	25,000,000	25,000,500
Federal Agencies	3134GUNR7	FREDDIE MAC	11/12/2019	8/12/2022	2.00	25,000,000	25,000,000	25,000,000	25,000,500

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				Date					Book Value	Market Value
Federal Agencies	3134GUAJ9	FREDDIE MAC	9/12/2019	9/12/2022		2.09	25,000,000	25,000,000	25,000,000	24,999,750
Federal Agencies	3134GUAJ9	FREDDIE MAC	9/12/2019	9/12/2022		2.09	25,000,000	25,000,000	25,000,000	24,999,750
Federal Agencies	3134GUAJ9	FREDDIE MAC	9/12/2019	9/12/2022		2.09	25,000,000	25,000,000	25,000,000	24,999,750
Federal Agencies	3134GUAJ9	FREDDIE MAC	9/12/2019	9/12/2022		2.09	25,000,000	25,000,000	25,000,000	24,999,750
Federal Agencies	3130AHD75	FEDERAL HOME LOAN BANK	10/17/2019	10/17/2022		2.05	25,000,000	25,000,000	25,000,000	25,004,250
Federal Agencies	3130AHD75	FEDERAL HOME LOAN BANK	10/17/2019	10/17/2022		2.05	25,000,000	25,000,000	25,000,000	25,004,250
Federal Agencies	3130AHD75	FEDERAL HOME LOAN BANK	10/17/2019	10/17/2022		2.05	25,000,000	25,000,000	25,000,000	25,004,250
Federal Agencies	3130AHD75	FEDERAL HOME LOAN BANK	10/17/2019	10/17/2022		2.05	25,000,000	25,000,000	25,000,000	25,004,250
Federal Agencies	3134GUJN1	FREDDIE MAC	10/17/2019	10/17/2022		2.10	25,000,000	25,000,000	25,000,000	25,004,250
Federal Agencies	3134GUJN1	FREDDIE MAC	10/17/2019	10/17/2022		2.10	25,000,000	25,000,000	25,000,000	25,004,250
Federal Agencies	3134GUJN1	FREDDIE MAC	10/17/2019	10/17/2022		2.10	25,000,000	25,000,000	25,000,000	25,004,250
Federal Agencies	3134GUJN1	FREDDIE MAC	10/17/2019	10/17/2022		2.10	50,000,000	50,000,000	50,000,000	50,008,500
Federal Agencies	3134GULD0	FREDDIE MAC	10/23/2019	10/21/2022		2.13	15,495,000	15,496,829	15,495,000	15,495,930
Federal Agencies	3130AHGS6	FEDERAL HOME LOAN BANK	10/30/2019	10/28/2022		2.00	25,000,000	25,000,000	25,000,000	25,011,750
Federal Agencies	3130AHGS6	FEDERAL HOME LOAN BANK	10/30/2019	10/28/2022		2.00	25,000,000	25,000,000	25,000,000	25,011,750
Federal Agencies	3130AHGS6	FEDERAL HOME LOAN BANK	10/30/2019	10/28/2022		2.00	50,000,000	50,000,000	50,000,000	50,023,500
Federal Agencies	3134GUB33	FREDDIE MAC	12/18/2019	9/18/2023		2.00	50,000,000	50,000,000	50,000,000	49,977,000
Federal Agencies	3134GUTS9	FREDDIE MAC	11/20/2019	5/20/2024		2.07	25,000,000	24,997,500	24,997,564	25,003,250
Federal Agencies	3134GUTS9	FREDDIE MAC	11/20/2019	5/20/2024		2.07	25,000,000	24,997,500	24,997,564	25,003,250
Federal Agencies	3134GUTS9	FREDDIE MAC	11/20/2019	5/20/2024		2.07	25,000,000	24,997,500	24,997,564	25,003,250
Federal Agencies	3134GUTS9	FREDDIE MAC	11/20/2019	5/20/2024		2.07	25,000,000	24,997,500	24,997,564	25,003,250
Federal Agencies	3134GUVL1	FREDDIE MAC	11/25/2019	5/28/2024		2.00	50,000,000	50,000,000	50,000,000	50,005,000
Federal Agencies	3134GUVL1	FREDDIE MAC	11/25/2019	5/28/2024		2.00	50,000,000	50,000,000	50,000,000	50,005,000
Federal Agencies	3130AHSZ7	FEDERAL HOME LOAN BANK	12/27/2019	6/27/2024		2.05	105,500,000	105,447,250	105,447,410	105,508,440
Federal Agencies	3134GUUR9	FREDDIE MAC	11/26/2019	8/26/2024		2.05	25,000,000	25,000,000	25,000,000	25,002,500
Federal Agencies	3134GUUR9	FREDDIE MAC	11/26/2019	8/26/2024		2.05	25,000,000	25,000,000	25,000,000	25,002,500
Federal Agencies	3134GUUR9	FREDDIE MAC	11/26/2019	8/26/2024		2.05	25,000,000	25,000,000	25,000,000	25,002,500
Federal Agencies	3134GUUR9	FREDDIE MAC	11/26/2019	8/26/2024		2.05	25,000,000	25,000,000	25,000,000	25,002,500
Federal Agencies	3134GUV9	FREDDIE MAC	11/27/2019	8/27/2024		2.05	25,000,000	25,000,000	25,000,000	25,002,750
Federal Agencies	3134GUV9	FREDDIE MAC	11/27/2019	8/27/2024		2.05	25,000,000	25,000,000	25,000,000	25,002,750
Federal Agencies	3134GUV9	FREDDIE MAC	11/27/2019	8/27/2024		2.05	25,000,000	25,000,000	25,000,000	25,002,750
Federal Agencies	3134GUV9	FREDDIE MAC	11/27/2019	8/27/2024		2.05	25,000,000	25,000,000	25,000,000	25,002,750
Federal Agencies	3130AHMR1	FEDERAL HOME LOAN BANK	11/27/2019	11/27/2024		2.10	25,000,000	25,000,000	25,000,000	25,001,000
Federal Agencies	3130AHMR1	FEDERAL HOME LOAN BANK	11/27/2019	11/27/2024		2.10	25,000,000	25,000,000	25,000,000	25,001,000
Federal Agencies	3130AHMR1	FEDERAL HOME LOAN BANK	11/27/2019	11/27/2024		2.10	25,000,000	25,000,000	25,000,000	25,001,000
Federal Agencies	3130AHMR1	FEDERAL HOME LOAN BANK	11/27/2019	11/27/2024		2.10	25,000,000	25,000,000	25,000,000	25,001,000
Federal Agencies	3133ELCP7	FEDERAL FARM CREDIT BANK	12/3/2019	12/3/2024		1.63	25,000,000	24,960,000	24,960,635	24,815,500
Federal Agencies	3134GUYD6	FREDDIE MAC	12/10/2019	12/10/2024		2.09	25,000,000	25,000,000	25,000,000	25,005,500
Federal Agencies	3134GUYD6	FREDDIE MAC	12/10/2019	12/10/2024		2.09	25,000,000	25,000,000	25,000,000	25,005,500
Federal Agencies	3134GUYD6	FREDDIE MAC	12/10/2019	12/10/2024		2.09	25,000,000	25,000,000	25,000,000	25,005,500
Federal Agencies	3134GUYD6	FREDDIE MAC	12/10/2019	12/10/2024		2.09	25,000,000	25,000,000	25,000,000	25,005,500
Federal Agencies	3130AHN58	FEDERAL HOME LOAN BANK	12/16/2019	12/16/2024		2.15	100,000,000	100,000,000	100,000,000	99,748,000
Federal Agencies	3130AHR86	FEDERAL HOME LOAN BANK	12/19/2019	12/19/2024		2.10	98,545,000	98,525,291	98,525,431	98,554,855
<b>Subtotals</b>						<b>2.04</b>	<b>\$ 5,183,190,000</b>	<b>\$ 5,180,011,094</b>	<b>\$ 5,181,772,999</b>	<b>\$ 5,200,744,699</b>
State/Local Agencies	977100CW4	WISCONSIN ST GEN FUND ANNUAL	8/16/2016	5/1/2020		1.45	\$ 18,000,000	\$ 18,000,000	\$ 18,000,000	\$ 17,989,920
State/Local Agencies	13063DGA0	CALIFORNIA ST	4/25/2018	4/1/2021		2.80	33,000,000	33,001,320	33,000,561	33,427,680
State/Local Agencies	13066TY5	CALIFORNIA ST DEPT OF WTR RES	2/6/2017	5/1/2021		1.71	27,962,641	27,489,513	27,813,812	27,951,456
State/Local Agencies	91412GF59	UNIV OF CALIFORNIA CA REVENUE	8/9/2016	5/15/2021		1.91	1,769,000	1,810,695	1,780,981	1,771,742
<b>Subtotals</b>						<b>2.11</b>	<b>\$ 80,731,641</b>	<b>\$ 80,301,528</b>	<b>\$ 80,595,355</b>	<b>\$ 81,140,798</b>

# Investment Inventory

## Pooled Fund

Type of Investment	CUSIP	Issuer Name	Settle Date	Maturity		Coupon	Par Value	Book Value	Amortized		Market Value	
				Date					Book Value			
Public Time Deposits	PP9J79QD6	BRIDGE BANK	9/26/2019	3/24/2020	1.95	\$	10,000,000	\$	10,000,000	\$	10,000,000	
Public Time Deposits	PP9N4D668	SAN FRANCISCO CRED UNION	12/4/2019	6/4/2020	1.59		10,000,000		10,000,000		10,000,000	
Public Time Deposits	PP9J7XBG2	BANK OF SAN FRANCISCO	12/11/2019	6/8/2020	1.57		5,000,000		5,000,000		5,000,000	
Public Time Deposits	PP9W8R1R2	BRIDGE BANK	12/23/2019	6/23/2020	1.60		10,000,000		10,000,000		10,000,000	
<b>Subtotals</b>						<b>1.69</b>	<b>\$</b>	<b>35,000,000</b>	<b>\$</b>	<b>35,000,000</b>	<b>\$</b>	<b>35,000,000</b>
Negotiable CDs	06370R4S5	BANK OF MONTREAL CHICAGO	10/2/2019	1/2/2020	2.05	\$	35,000,000	\$	35,000,000	\$	35,000,605	
Negotiable CDs	63873NE49	NATIXIS NY BRANCH	1/11/2019	1/6/2020	3.00		50,000,000		50,000,000		50,010,155	
Negotiable CDs	78012UNB7	ROYAL BANK OF CANADA NY	4/8/2019	1/6/2020	2.57		25,000,000		25,000,000		25,003,362	
Negotiable CDs	78012UNC5	ROYAL BANK OF CANADA NY	4/8/2019	1/8/2020	2.57		25,000,000		25,000,000		25,004,482	
Negotiable CDs	89114MB30	TORONTO DOMINION BANK NY	4/8/2019	1/17/2020	2.60		50,000,000		50,000,000		50,019,738	
Negotiable CDs	89114NDX0	TORONTO DOMINION BANK NY	12/17/2019	1/17/2020	2.00		40,000,000		40,000,000		40,005,070	
Negotiable CDs	65602VRW8	NORINCHUKIN BANK NY	9/24/2019	1/24/2020	2.11		50,000,000		50,000,000		50,012,321	
Negotiable CDs	06417G6G8	BANK OF NOVA SCOTIA HOUS	4/25/2019	2/3/2020	2.57		50,000,000		50,000,000		50,008,147	
Negotiable CDs	89114MF36	TORONTO DOMINION BANK NY	4/24/2019	2/3/2020	2.56		50,000,000		50,000,000		50,037,675	
Negotiable CDs	06417G6H6	BANK OF NOVA SCOTIA HOUS	4/25/2019	2/5/2020	2.57		50,000,000		50,000,000		50,040,387	
Negotiable CDs	06417G6K9	BANK OF NOVA SCOTIA HOUS	4/29/2019	2/6/2020	2.56		50,000,000		50,000,000		50,041,025	
Negotiable CDs	06367BDP1	BANK OF MONTREAL CHICAGO	12/17/2019	2/14/2020	2.00		50,000,000		50,000,000		50,016,755	
Negotiable CDs	96130ABW7	WESTPAC BANKING CORP NY	2/15/2019	2/14/2020	2.71		50,000,000		50,000,000		50,058,527	
Negotiable CDs	06417G6L7	BANK OF NOVA SCOTIA HOUS	4/29/2019	2/19/2020	2.57		50,000,000		50,000,000		50,056,089	
Negotiable CDs	06417G6V5	BANK OF NOVA SCOTIA HOUS	5/6/2019	2/21/2020	2.57		50,000,000		50,000,000		50,058,389	
Negotiable CDs	65602VTH9	NORINCHUKIN BANK NY	10/25/2019	2/25/2020	1.93		75,000,000		75,000,000		75,022,548	
Negotiable CDs	96130ACE6	WESTPAC BANKING CORP NY	3/6/2019	2/26/2020	2.70		50,000,000		50,000,000		50,073,509	
Negotiable CDs	06367BAK5	BANK OF MONTREAL CHICAGO	11/26/2019	2/28/2020	1.85		35,000,000		35,000,000		35,006,686	
Negotiable CDs	06370RUV9	BANK OF MONTREAL CHICAGO	3/1/2019	3/2/2020	2.68		50,000,000		50,000,000		50,078,190	
Negotiable CDs	06370RVN6	BANK OF MONTREAL CHICAGO	3/5/2019	3/2/2020	2.70		50,000,000		50,000,000		50,079,927	
Negotiable CDs	65602VVG7	NORINCHUKIN BANK NY	12/19/2019	3/11/2020	1.95		25,000,000		25,000,000		25,010,755	
Negotiable CDs	06417MBS3	BANK OF NOVA SCOTIA HOUS	9/12/2019	3/12/2020	2.02		100,000,000		100,000,000		100,055,672	
Negotiable CDs	65602VVD5	NORINCHUKIN BANK NY	11/25/2019	3/16/2020	1.87		50,000,000		50,000,000		50,014,384	
Negotiable CDs	89114N4B8	TORONTO DOMINION BANK NY	9/17/2019	3/16/2020	2.06		75,000,000		75,000,000		75,050,420	
Negotiable CDs	65602VUF1	NORINCHUKIN BANK NY	11/7/2019	3/18/2020	1.89		40,000,000		40,000,000		40,013,392	
Negotiable CDs	78012UMY8	ROYAL BANK OF CANADA NY	4/4/2019	3/25/2020	2.58		50,000,000		50,000,000		50,095,989	
Negotiable CDs	78012UMZ5	ROYAL BANK OF CANADA NY	4/4/2019	3/30/2020	2.58		50,000,000		50,000,000		50,101,611	
Negotiable CDs	06370RYS2	BANK OF MONTREAL CHICAGO	4/11/2019	4/13/2020	2.60		65,000,000		65,000,000		65,141,126	
Negotiable CDs	65602VSV9	NORINCHUKIN BANK NY	11/4/2019	4/24/2020	1.95		70,500,000		70,551,637		70,529,855	
Negotiable CDs	89114N4G7	TORONTO DOMINION BANK NY	9/18/2019	4/24/2020	2.05		40,000,000		40,000,000		40,029,128	
Negotiable CDs	06417MCD5	BANK OF NOVA SCOTIA HOUS	9/18/2019	4/27/2020	2.03		100,000,000		100,000,000		100,068,325	
Negotiable CDs	65602VTE6	NORINCHUKIN BANK NY	10/29/2019	4/28/2020	1.94		50,000,000		50,000,000		50,020,349	
Negotiable CDs	65602VTL0	NORINCHUKIN BANK NY	10/30/2019	4/30/2020	1.93		75,000,000		75,000,000		75,028,560	
Negotiable CDs	78012UQY4	ROYAL BANK OF CANADA NY	9/17/2019	5/11/2020	2.02		100,000,000		100,000,000		100,072,608	
Negotiable CDs	89114NCH6	TORONTO DOMINION BANK NY	12/6/2019	5/13/2020	1.86		50,000,000		50,000,000		50,008,811	
Negotiable CDs	89114NB20	TORONTO DOMINION BANK NY	11/19/2019	6/22/2020	1.83		60,000,000		60,000,000		60,004,639	
Negotiable CDs	06417MFP5	BANK OF NOVA SCOTIA HOUS	12/5/2019	7/1/2020	1.85		50,000,000		50,000,000		50,006,943	
Negotiable CDs	89114NA54	TORONTO DOMINION BANK NY	11/6/2019	7/1/2020	1.86		50,000,000		50,000,000		50,008,771	
Negotiable CDs	96121T4A3	WESTPAC BANKING CORP NY	11/12/2019	8/3/2020	2.05		28,790,000		28,983,173		28,820,365	
Negotiable CDs	06367BAC3	BANK OF MONTREAL CHICAGO	11/25/2019	9/2/2020	2.00		50,000,000		50,000,000		50,059,905	
Negotiable CDs	89114N5H4	TORONTO DOMINION BANK NY	9/25/2019	9/24/2020	2.08		100,000,000		100,000,000		100,191,968	
Negotiable CDs	06417MCW3	BANK OF NOVA SCOTIA HOUS	9/27/2019	9/28/2020	2.13		50,000,000		50,000,000		50,114,244	
Negotiable CDs	89114N5M3	TORONTO DOMINION BANK NY	9/27/2019	9/28/2020	2.12		50,000,000		50,000,000		50,109,453	

# Investment Inventory

## Pooled Fund

Type of Investment	CUSIP	Issuer Name	Settle Date	Maturity		Coupon	Par Value	Book Value	Amortized	
				Date					Book Value	Market Value
Negotiable CDs	06417MDE2	BANK OF NOVA SCOTIA HOUS	10/3/2019	10/9/2020		2.04	50,000,000	50,000,000	50,000,000	50,081,912
Negotiable CDs	89114N6E0	TORONTO DOMINION BANK NY	10/1/2019	10/9/2020		2.04	50,000,000	50,000,000	50,000,000	50,081,912
Negotiable CDs	06370R6W4	BANK OF MONTREAL CHICAGO	11/13/2019	10/26/2020		2.05	50,000,000	50,000,000	50,000,000	50,091,713
Negotiable CDs	96130ADY1	WESTPAC BANKING CORP NY	10/30/2019	10/28/2020		2.08	50,000,000	50,000,000	50,000,000	50,105,953
Negotiable CDs	78012URS6	ROYAL BANK OF CANADA NY	12/3/2019	12/3/2020		2.02	35,000,000	35,000,000	35,000,000	35,060,130
Negotiable CDs	06367BBD0	BANK OF MONTREAL CHICAGO	12/3/2019	12/4/2020		1.85	50,000,000	50,000,000	50,000,000	50,008,039
Negotiable CDs	96130AEP9	WESTPAC BANKING CORP NY	12/6/2019	12/9/2020		2.04	50,000,000	50,000,000	50,000,000	50,097,640
Negotiable CDs	96130AET1	WESTPAC BANKING CORP NY	12/13/2019	12/14/2020		1.86	75,000,000	75,000,000	75,000,000	75,020,216
<b>Subtotals</b>						<b>2.18</b>	<b>\$ 2,724,290,000</b>	<b>\$ 2,724,534,810</b>	<b>\$ 2,724,326,749</b>	<b>\$ 2,726,425,072</b>
Commercial Paper	62479LAT2	MUFG BANK LTD NY	9/27/2019	1/27/2020		0.00	\$ 50,000,000	\$ 49,647,556	\$ 49,924,889	\$ 49,938,611
Commercial Paper	62479LAX3	MUFG BANK LTD NY	8/28/2019	1/31/2020		0.00	40,000,000	39,644,667	39,931,667	39,943,333
Commercial Paper	62479LBT1	MUFG BANK LTD NY	9/30/2019	2/27/2020		0.00	50,000,000	49,572,917	49,837,708	49,865,417
Commercial Paper	62479LC45	MUFG BANK LTD NY	10/24/2019	3/4/2020		0.00	15,000,000	14,894,400	14,949,600	14,953,800
Commercial Paper	62479LC45	MUFG BANK LTD NY	10/7/2019	3/4/2020		0.00	25,000,000	24,797,194	24,914,250	24,923,000
Commercial Paper	62479LC60	MUFG BANK LTD NY	9/11/2019	3/6/2020		0.00	50,000,000	49,500,958	49,816,736	49,841,111
Commercial Paper	62479LCG8	MUFG BANK LTD NY	10/7/2019	3/16/2020		0.00	75,000,000	74,342,583	74,693,750	74,725,000
Commercial Paper	89233GCH7	TOYOTA MOTOR CREDIT CORP	9/18/2019	3/17/2020		0.00	50,000,000	49,484,653	49,783,611	49,814,222
Commercial Paper	89233GCJ3	TOYOTA MOTOR CREDIT CORP	9/24/2019	3/18/2020		0.00	50,000,000	49,511,111	49,786,111	49,811,778
Commercial Paper	89233GD11	TOYOTA MOTOR CREDIT CORP	11/25/2019	4/1/2020		0.00	50,000,000	49,664,000	49,761,125	49,766,181
Commercial Paper	89233GEN2	TOYOTA MOTOR CREDIT CORP	11/25/2019	5/22/2020		0.00	50,000,000	49,535,097	49,631,194	49,637,111
Commercial Paper	89233GEN2	TOYOTA MOTOR CREDIT CORP	12/2/2019	5/22/2020		0.00	65,000,000	64,422,367	64,523,117	64,528,244
Commercial Paper	89233GET9	TOYOTA MOTOR CREDIT CORP	12/2/2019	5/27/2020		0.00	40,000,000	39,634,200	39,696,200	39,699,467
Commercial Paper	62479LF59	MUFG BANK LTD NY	9/24/2019	6/5/2020		0.00	25,000,000	24,638,750	24,779,000	24,800,667
Commercial Paper	62479LFA8	MUFG BANK LTD NY	12/30/2019	6/10/2020		0.00	40,000,000	39,655,889	39,660,111	39,670,844
Commercial Paper	62479LFF7	MUFG BANK LTD NY	9/24/2019	6/15/2020		0.00	50,000,000	49,249,167	49,529,667	49,575,778
Commercial Paper	62479LG17	MUFG BANK LTD NY	10/25/2019	7/1/2020		0.00	60,000,000	59,195,833	59,414,567	59,441,867
Commercial Paper	62479LG17	MUFG BANK LTD NY	10/21/2019	7/1/2020		0.00	75,000,000	73,984,000	74,272,000	74,302,334
Commercial Paper	89233GG18	TOYOTA MOTOR CREDIT CORP	11/6/2019	7/1/2020		0.00	50,000,000	49,381,861	49,527,306	49,534,889
Commercial Paper	89233GG18	TOYOTA MOTOR CREDIT CORP	12/9/2019	7/1/2020		0.00	50,000,000	49,470,417	49,529,833	49,534,889
Commercial Paper	89233GHH2	TOYOTA MOTOR CREDIT CORP	12/6/2019	8/17/2020		0.00	50,000,000	49,358,958	49,424,319	49,414,778
Commercial Paper	62479LHR9	MUFG BANK LTD NY	12/10/2019	8/25/2020		0.00	45,000,000	44,394,588	44,446,013	44,454,900
<b>Subtotals</b>						<b>0.00</b>	<b>\$ 1,055,000,000</b>	<b>\$ 1,043,981,165</b>	<b>\$ 1,047,832,774</b>	<b>\$ 1,048,178,220</b>
Medium Term Notes	89236TEJ0	TOYOTA MOTOR CREDIT CORP	1/11/2018	1/10/2020		2.20	\$ 20,000,000	\$ 19,982,200	\$ 19,999,780	\$ 20,000,000
Medium Term Notes	89236TFQ3	TOYOTA MOTOR CREDIT CORP	1/8/2019	1/8/2021		3.05	5,000,000	4,997,000	4,998,469	5,060,500
<b>Subtotals</b>						<b>2.37</b>	<b>\$ 25,000,000</b>	<b>\$ 24,979,200</b>	<b>\$ 24,998,249</b>	<b>\$ 25,060,500</b>
Money Market Funds	262006208	DREYFUS GOVERN CASH MGMT-I	12/31/2019	1/1/2020		1.52	\$ 10,536,800	\$ 10,536,800	\$ 10,536,800	\$ 10,536,800
Money Market Funds	608919718	FEDERATED GOVERNMENT OBL-PF	12/31/2019	1/1/2020		1.53	66,956,887	66,956,887	66,956,887	66,956,887
Money Market Funds	09248U718	BLACKROCK LIQ INST GOV FUND	12/31/2019	1/1/2020		1.51	10,506,961	10,506,961	10,506,961	10,506,961
Money Market Funds	31607A703	FIDELITY INST GOV FUND	12/31/2019	1/1/2020		1.55	592,395,803	592,395,803	592,395,803	592,395,803
Money Market Funds	61747C707	MORGAN STANLEY INST GOVT FUND	12/31/2019	1/1/2020		1.52	11,344,859	11,344,859	11,344,859	11,344,859
<b>Subtotals</b>						<b>1.54</b>	<b>\$ 691,741,310</b>	<b>\$ 691,741,310</b>	<b>\$ 691,741,310</b>	<b>\$ 691,741,310</b>

## Investment Inventory Pooled Fund

Type of Investment	CUSIP	Issuer Name	Settle Date	Maturity		Coupon	Par Value	Book Value	Amortized	
				Date					Book Value	Market Value
Supranationals	459052RX6	INTL BK RECON & DEVELOP DISC	4/24/2019	1/17/2020		0.00	\$ 20,000,000	\$ 19,645,644	\$ 19,978,844	\$ 19,987,400
Supranationals	459052SC1	INTL BK RECON & DEVELOP DISC	4/24/2019	1/22/2020		0.00	40,000,000	39,278,067	39,944,467	39,966,400
Supranationals	459052SH0	INTL BK RECON & DEVELOP DISC	10/3/2019	1/27/2020		0.00	25,000,000	24,850,972	24,966,597	24,973,750
Supranationals	459052SH0	INTL BK RECON & DEVELOP DISC	10/3/2019	1/27/2020		0.00	50,000,000	49,701,944	49,933,194	49,947,500
Supranationals	459052SJ6	INTL BK RECON & DEVELOP DISC	10/2/2019	1/28/2020		0.00	100,000,000	99,393,611	99,861,250	99,891,000
Supranationals	459058FZ1	INTL BK RECON & DEVELOP	3/21/2017	4/21/2020		1.88	50,000,000	49,956,500	49,995,716	50,012,000
Supranationals	4581X0CX4	INTER-AMERICAN DEVEL BK	5/17/2018	5/12/2020		1.63	10,000,000	9,789,360	9,961,702	9,994,200
Supranationals	4581X0CX4	INTER-AMERICAN DEVEL BK	4/12/2017	5/12/2020		1.63	25,000,000	24,940,750	24,993,054	24,985,500
Supranationals	459052XW1	INTL BK RECON & DEVELOP DISC	12/11/2019	6/8/2020		0.00	100,000,000	99,200,000	99,293,333	99,307,000
Supranationals	459058GA5	INTL BK RECON & DEVELOP	8/29/2017	9/4/2020		1.63	50,000,000	49,989,500	49,997,647	49,960,000
Supranationals	45905UQ80	INTL BK RECON & DEVELOP	11/9/2017	11/9/2020		1.95	50,000,000	49,965,000	49,990,005	50,082,000
Supranationals	45905UQ80	INTL BK RECON & DEVELOP	12/20/2017	11/9/2020		1.95	50,000,000	49,718,500	49,916,484	50,082,000
Supranationals	45950KCM0	INTERNATIONAL FINANCE CORP	1/25/2018	1/25/2021		2.25	50,000,000	49,853,000	49,947,692	50,299,500
Supranationals	4581X0DB1	INTER-AMERICAN DEVEL BK	4/19/2018	4/19/2021		2.63	45,000,000	44,901,000	44,957,184	45,542,700
Supranationals	4581X0DB1	INTER-AMERICAN DEVEL BK	5/16/2018	4/19/2021		2.63	50,000,000	49,693,972	49,864,305	50,603,000
Supranationals	45950KCJ7	INTERNATIONAL FINANCE CORP	5/23/2018	7/20/2021		1.13	12,135,000	11,496,942	11,822,053	12,032,338
Supranationals	459058GH0	INTL BK RECON & DEVELOP	7/25/2018	7/23/2021		2.75	50,000,000	49,883,000	49,939,147	50,831,500
<b>Subtotals</b>						<b>1.22</b>	<b>\$ 777,135,000</b>	<b>\$ 772,257,762</b>	<b>\$ 775,362,674</b>	<b>\$ 778,497,788</b>
<b>Grand Totals</b>						<b>1.81</b>	<b>\$ 12,432,087,950</b>	<b>\$ 12,419,467,653</b>	<b>\$ 12,427,748,013</b>	<b>\$ 12,456,561,135</b>

# Monthly Investment Earnings

## Pooled Fund

For month ended December 31, 2019

Type of Investment	CUSIP	Issuer Name	Par Value	Coupon	YTM <sup>1</sup>	Settle Date	Maturity		Amort. Expense	Realized Gain/(Loss)	Earned Income /Net Earnings
							Date	Earned Interest			
U.S. Treasuries	912796WL9	TREASURY BILL	\$ -	0.00	1.54	12/10/19	12/31/19	\$ -	\$ 44,990	\$ -	\$ 44,990
U.S. Treasuries	9128283N8	US TREASURY	-	1.88	2.01	1/16/18	12/31/19	76,427	5,416	-	81,843
U.S. Treasuries	912796TM1	TREASURY BILL	50,000,000	0.00	1.80	10/3/19	4/2/20	-	76,854	-	76,854
U.S. Treasuries	912828XU9	US TREASURY	50,000,000	1.50	1.51	6/20/17	6/15/20	63,525	499	-	64,024
U.S. Treasuries	912828XU9	US TREASURY	50,000,000	1.50	2.39	4/3/19	6/15/20	63,525	36,825	-	100,349
U.S. Treasuries	912828XU9	US TREASURY	100,000,000	1.50	2.67	12/20/18	6/15/20	127,049	96,340	-	223,389
U.S. Treasuries	912828XY1	US TREASURY	50,000,000	2.50	2.38	4/3/19	6/30/20	105,336	(4,801)	-	100,535
U.S. Treasuries	9128285B2	US TREASURY	60,000,000	2.75	1.81	10/1/19	9/30/20	139,754	(46,978)	-	92,776
U.S. Treasuries	9128282Z2	US TREASURY	50,000,000	1.63	1.63	11/20/19	10/15/20	68,818	-	-	68,818
U.S. Treasuries	9128283L2	US TREASURY	50,000,000	1.88	1.63	11/18/19	12/15/20	79,406	(10,168)	-	69,238
U.S. Treasuries	9128283L2	US TREASURY	50,000,000	1.88	1.65	11/26/19	12/15/20	79,406	(9,593)	-	69,813
U.S. Treasuries	912828N48	US TREASURY	50,000,000	1.75	1.64	11/22/19	12/31/20	73,735	(4,485)	-	69,250
U.S. Treasuries	9128283Q1	US TREASURY	50,000,000	2.00	2.57	3/4/19	1/15/21	84,239	23,315	-	107,554
U.S. Treasuries	9128283Q1	US TREASURY	50,000,000	2.00	1.63	11/18/19	1/15/21	84,239	(15,422)	-	68,817
U.S. Treasuries	9128283Q1	US TREASURY	50,000,000	2.00	1.63	11/22/19	1/15/21	84,239	(15,425)	-	68,814
U.S. Treasuries	9128283Q1	US TREASURY	50,000,000	2.00	1.68	12/3/19	1/15/21	78,804	(12,464)	-	66,341
U.S. Treasuries	9128284B3	US TREASURY	50,000,000	2.38	1.64	11/22/19	3/15/21	101,133	(30,589)	-	70,544
U.S. Treasuries	9128284B3	US TREASURY	50,000,000	2.38	1.66	12/6/19	3/15/21	84,821	(25,118)	-	59,704
U.S. Treasuries	912828C57	US TREASURY	50,000,000	2.25	2.39	4/15/19	3/31/21	95,287	5,919	-	101,206
U.S. Treasuries	9128284G2	US TREASURY	50,000,000	2.38	2.36	4/9/19	4/15/21	100,581	(575)	-	100,006
U.S. Treasuries	9128284G2	US TREASURY	50,000,000	2.38	1.68	12/9/19	4/15/21	74,624	(21,595)	-	53,029
U.S. Treasuries	9128284G2	US TREASURY	50,000,000	2.38	1.68	12/11/19	4/15/21	68,135	(19,547)	-	48,588
U.S. Treasuries	9128284T4	US TREASURY	50,000,000	2.63	1.66	11/26/19	6/15/21	111,168	(40,044)	-	71,124
U.S. Treasuries	9128284T4	US TREASURY	50,000,000	2.63	1.65	11/27/19	6/15/21	111,168	(40,757)	-	70,411
U.S. Treasuries	9128284T4	US TREASURY	50,000,000	2.63	1.69	12/11/19	6/15/21	75,307	(26,526)	-	48,781
U.S. Treasuries	9128284T4	US TREASURY	50,000,000	2.63	1.65	12/18/19	6/15/21	50,205	(18,363)	-	31,842
U.S. Treasuries	9128287A2	US TREASURY	50,000,000	1.63	1.71	11/8/19	6/30/21	68,469	3,431	-	71,900
U.S. Treasuries	9128287A2	US TREASURY	50,000,000	1.63	1.67	12/3/19	6/30/21	64,053	1,576	-	65,629
U.S. Treasuries	9128287A2	US TREASURY	50,000,000	1.63	1.65	12/9/19	6/30/21	50,806	868	-	51,674
U.S. Treasuries	912828S27	US TREASURY	25,000,000	1.13	1.64	8/15/17	6/30/21	23,701	10,526	-	34,227
U.S. Treasuries	912828Y20	US TREASURY	50,000,000	2.63	1.69	12/12/19	7/15/21	71,332	(25,078)	-	46,254
U.S. Treasuries	912828YC8	US TREASURY	50,000,000	1.50	1.66	12/9/19	8/31/21	47,390	4,912	-	52,302
U.S. Treasuries	912828T34	US TREASURY	50,000,000	1.13	1.69	12/11/19	9/30/21	32,275	15,995	-	48,270
U.S. Treasuries	912828T67	US TREASURY	50,000,000	1.25	1.43	11/10/16	10/31/21	53,228	7,268	-	60,496
U.S. Treasuries	912828U65	US TREASURY	100,000,000	1.75	1.90	12/13/16	11/30/21	148,224	11,755	-	159,979
U.S. Treasuries	912828U81	US TREASURY	50,000,000	2.00	1.61	11/22/19	12/31/21	84,269	(16,198)	-	68,071
U.S. Treasuries	912828XW5	US TREASURY	25,000,000	1.75	1.77	8/15/17	6/30/22	36,868	391	-	37,259
U.S. Treasuries	912828WE6	US TREASURY	50,000,000	2.75	1.71	12/17/19	11/15/23	56,662	(20,584)	-	36,078
<b>Subtotals</b>			<b>\$ 1,860,000,000</b>					<b>\$ 2,818,207</b>	<b>\$ (57,429)</b>	<b>\$ -</b>	<b>\$ 2,760,778</b>
Federal Agencies	313384PZ6	FED HOME LN DISCOUNT NT	\$ -	0.00	1.53	11/29/19	12/2/19	\$ -	\$ 3,400	\$ -	\$ 3,400
Federal Agencies	3133EGN43	FEDERAL FARM CREDIT BANK	-	1.94	1.94	12/2/16	12/2/19	2,701	-	-	2,701
Federal Agencies	3130A0JR2	FEDERAL HOME LOAN BANK	-	2.38	1.90	12/12/17	12/13/19	15,833	(3,055)	-	12,778
Federal Agencies	3130A0JR2	FEDERAL HOME LOAN BANK	-	2.38	1.90	12/15/17	12/13/19	8,993	(1,729)	-	7,264
Federal Agencies	3130A0JR2	FEDERAL HOME LOAN BANK	-	2.38	1.90	12/15/17	12/13/19	31,667	(6,086)	-	25,581
Federal Agencies	3136G4KQ5	FANNIE MAE	1,000,000	1.65	1.84	11/17/17	1/17/20	1,375	154	-	1,529
Federal Agencies	3136G4KQ5	FANNIE MAE	31,295,000	1.65	1.84	11/17/17	1/17/20	43,031	4,820	-	47,851
Federal Agencies	3133EJLU1	FEDERAL FARM CREDIT BANK	25,000,000	2.42	2.43	4/24/18	1/24/20	50,417	170	-	50,586
Federal Agencies	3133EJLU1	FEDERAL FARM CREDIT BANK	25,000,000	2.42	2.43	4/24/18	1/24/20	50,417	208	-	50,625
Federal Agencies	313384SK6	FED HOME LN DISCOUNT NT	33,375,000	0.00	1.57	11/19/19	1/29/20	-	45,121	-	45,121
Federal Agencies	313384SK6	FED HOME LN DISCOUNT NT	50,000,000	0.00	1.85	9/30/19	1/29/20	-	79,222	-	79,222
Federal Agencies	3130ADN32	FEDERAL HOME LOAN BANK	50,000,000	2.13	2.22	2/9/18	2/11/20	88,542	3,875	-	92,417
Federal Agencies	313378J77	FEDERAL HOME LOAN BANK	15,710,000	1.88	1.56	5/17/17	3/13/20	24,547	(4,025)	-	20,522

# Monthly Investment Earnings

## Pooled Fund

Type of Investment	CUSIP	Issuer Name	Par Value	Coupon	YTM <sup>1</sup>	Settle Date	Maturity		Earned Interest	Amort.	Realized	Earned Income
							Date	Date		Expense	Gain/(Loss)	/Net Earnings
Federal Agencies	3133EHZN6	FEDERAL FARM CREDIT BANK	20,000,000	1.45	1.49	9/20/17	3/20/20	24,167	700	-	24,867	
Federal Agencies	3133EJHL6	FEDERAL FARM CREDIT BANK	50,000,000	2.38	2.41	3/27/18	3/27/20	98,958	1,527	-	100,485	
Federal Agencies	3134GBET5	FREDDIE MAC	10,000,000	1.80	2.68	5/22/18	4/13/20	15,000	7,195	-	22,195	
Federal Agencies	3133EJG37	FEDERAL FARM CREDIT BANK	25,000,000	2.85	2.87	10/15/18	4/15/20	59,375	424	-	59,799	
Federal Agencies	3136G4BL6	FANNIE MAE	15,000,000	1.25	1.25	10/17/16	4/17/20	15,625	-	-	15,625	
Federal Agencies	3137EAEM7	FREDDIE MAC	35,000,000	2.50	2.51	4/19/18	4/23/20	72,917	325	-	73,241	
Federal Agencies	3134GBPB2	FREDDIE MAC	15,750,000	1.70	1.70	5/30/17	5/22/20	22,313	-	-	22,313	
Federal Agencies	3133EHNK5	FEDERAL FARM CREDIT BANK	25,000,000	1.54	1.54	6/15/17	6/15/20	32,083	71	-	32,154	
Federal Agencies	3133EHNK5	FEDERAL FARM CREDIT BANK	26,900,000	1.54	1.55	6/15/17	6/15/20	34,522	152	-	34,674	
Federal Agencies	3134GBST0	FREDDIE MAC	14,675,000	1.65	1.65	6/22/17	6/22/20	20,178	-	-	20,178	
Federal Agencies	3134GBTX0	FREDDIE MAC	50,000,000	1.75	1.76	6/29/17	6/29/20	72,917	283	-	73,200	
Federal Agencies	3136G3TG0	FANNIE MAE	-	1.75	1.75	6/30/16	6/30/20	21,146	-	-	21,146	
Federal Agencies	3134GB5M0	FREDDIE MAC	-	1.96	1.96	12/1/17	7/1/20	-	-	-	-	
Federal Agencies	3133EHQB2	FEDERAL FARM CREDIT BANK	25,000,000	1.55	1.56	7/6/17	7/6/20	32,292	284	-	32,576	
Federal Agencies	3130ABNV4	FEDERAL HOME LOAN BANK	50,000,000	1.75	1.75	7/13/17	7/13/20	72,917	-	-	72,917	
Federal Agencies	3134GBXV9	FREDDIE MAC	50,000,000	1.85	1.85	7/13/17	7/13/20	77,083	-	-	77,083	
Federal Agencies	3135G0T60	FANNIE MAE	50,000,000	1.50	1.60	8/1/17	7/30/20	62,500	4,293	-	66,793	
Federal Agencies	3130ABZE9	FEDERAL HOME LOAN BANK	6,700,000	1.65	1.65	8/28/17	8/28/20	9,213	19	-	9,231	
Federal Agencies	3130ABZN9	FEDERAL HOME LOAN BANK	25,000,000	1.80	1.80	8/28/17	8/28/20	37,500	-	-	37,500	
Federal Agencies	3130ABZN9	FEDERAL HOME LOAN BANK	50,000,000	1.80	1.80	8/28/17	8/28/20	75,000	-	-	75,000	
Federal Agencies	3130AH2K8	FEDERAL HOME LOAN BANK	-	2.05	2.05	9/10/19	9/10/20	25,625	-	-	25,625	
Federal Agencies	3130AH2K8	FEDERAL HOME LOAN BANK	-	2.05	2.05	9/10/19	9/10/20	25,625	-	-	25,625	
Federal Agencies	3130ADT93	FEDERAL HOME LOAN BANK	25,000,000	2.40	2.43	3/14/18	9/14/20	50,000	527	-	50,527	
Federal Agencies	3133EJ3N7	FEDERAL FARM CREDIT BANK	25,000,000	2.77	2.79	12/21/18	9/21/20	57,708	448	-	58,156	
Federal Agencies	3130ACE26	FEDERAL HOME LOAN BANK	18,000,000	1.38	1.48	9/8/17	9/28/20	20,625	1,605	-	22,230	
Federal Agencies	3130ACE26	FEDERAL HOME LOAN BANK	30,000,000	1.38	1.48	9/8/17	9/28/20	34,375	2,675	-	37,050	
Federal Agencies	3130ACK52	FEDERAL HOME LOAN BANK	25,530,000	1.70	2.48	3/12/18	10/5/20	36,168	16,356	-	52,523	
Federal Agencies	3133EKR57	FEDERAL FARM CREDIT BANK	112,500,000	1.80	1.86	9/25/19	10/20/20	172,389	3,898	-	176,287	
Federal Agencies	3132X0KR1	FARMER MAC	25,000,000	1.91	1.91	11/2/16	11/2/20	41,139	-	-	41,139	
Federal Agencies	3132X0ZF1	FARMER MAC	12,000,000	1.93	2.02	11/13/17	11/9/20	19,300	852	-	20,152	
Federal Agencies	3133EJT90	FEDERAL FARM CREDIT BANK	50,000,000	2.95	3.00	11/16/18	11/16/20	122,917	2,212	-	125,129	
Federal Agencies	3137EAEK1	FREDDIE MAC	50,000,000	1.88	1.91	11/15/17	11/17/20	78,125	1,355	-	79,480	
Federal Agencies	3134GBX56	FREDDIE MAC	60,000,000	2.25	2.12	11/24/17	11/24/20	112,500	(6,313)	-	106,187	
Federal Agencies	3134GBLR1	FREDDIE MAC	24,715,000	1.75	1.75	5/25/17	11/25/20	36,043	60	-	36,103	
Federal Agencies	3133EHW58	FEDERAL FARM CREDIT BANK	25,000,000	1.90	1.91	11/27/17	11/27/20	39,583	208	-	39,792	
Federal Agencies	3133EHW58	FEDERAL FARM CREDIT BANK	25,000,000	1.90	1.91	11/27/17	11/27/20	39,583	208	-	39,792	
Federal Agencies	3130A3UQ5	FEDERAL HOME LOAN BANK	10,000,000	1.88	2.02	12/13/17	12/11/20	15,625	1,201	-	16,826	
Federal Agencies	3132X0ZY0	FARMER MAC	12,750,000	2.05	2.07	12/15/17	12/15/20	21,781	242	-	22,023	
Federal Agencies	3133EGX75	FEDERAL FARM CREDIT BANK	50,000,000	1.98	1.98	12/21/16	12/21/20	83,276	-	-	83,276	
Federal Agencies	3133EFTX5	FEDERAL FARM CREDIT BANK	100,000,000	2.11	2.11	12/24/15	12/24/20	177,092	-	-	177,092	
Federal Agencies	3133EJ4Q9	FEDERAL FARM CREDIT BANK	100,000,000	2.55	2.58	1/11/19	1/11/21	212,500	2,799	-	215,299	
Federal Agencies	3130AC2K9	FEDERAL HOME LOAN BANK	50,200,000	1.87	1.88	9/20/17	2/10/21	78,228	251	-	78,480	
Federal Agencies	3133EJCE7	FEDERAL FARM CREDIT BANK	50,000,000	2.35	2.59	4/16/18	2/12/21	97,917	9,792	-	107,709	
Federal Agencies	3137EAEL9	FREDDIE MAC	22,000,000	2.38	2.47	2/16/18	2/16/21	43,542	1,643	-	45,184	
Federal Agencies	3134GBD58	FREDDIE MAC	5,570,000	1.80	1.80	8/30/17	2/26/21	8,355	14	-	8,369	
Federal Agencies	3133EKCS3	FEDERAL FARM CREDIT BANK	50,000,000	2.55	2.58	3/11/19	3/11/21	106,250	1,060	-	107,310	
Federal Agencies	3133EKCS3	FEDERAL FARM CREDIT BANK	50,000,000	2.55	2.58	3/11/19	3/11/21	106,250	1,060	-	107,310	
Federal Agencies	3133EKR99	FEDERAL FARM CREDIT BANK	90,000,000	1.90	1.92	10/3/19	3/25/21	142,365	1,035	-	143,400	
Federal Agencies	3132X0Q53	FARMER MAC	6,350,000	2.60	2.64	3/29/18	3/29/21	13,758	196	-	13,954	
Federal Agencies	3132X0Q53	FARMER MAC	20,450,000	2.60	2.64	3/29/18	3/29/21	44,308	630	-	44,939	
Federal Agencies	3133EKFP6	FEDERAL FARM CREDIT BANK	25,000,000	2.23	2.40	4/5/19	4/5/21	46,458	3,541	-	49,999	
Federal Agencies	3133EKFP6	FEDERAL FARM CREDIT BANK	25,000,000	2.23	2.40	4/5/19	4/5/21	46,458	3,499	-	49,957	
Federal Agencies	3134GBJP8	FREDDIE MAC	22,000,000	1.89	2.06	11/16/17	5/3/21	34,650	3,075	-	37,725	
Federal Agencies	3133EJNS4	FEDERAL FARM CREDIT BANK	17,700,000	2.70	2.79	5/22/18	5/10/21	39,825	1,341	-	41,166	

# Monthly Investment Earnings

## Pooled Fund

Type of Investment	CUSIP	Issuer Name	Par Value	Coupon	YTM <sup>1</sup>	Settle Date	Maturity		Earned Interest	Amort.	Realized	Earned Income
							Date	Date		Expense	Gain/(Loss)	/Net Earnings
Federal Agencies	3135G0U35	FANNIE MAE	25,000,000	2.75	2.76	6/25/18	6/22/21	57,292	163	-	-	57,455
Federal Agencies	3134GBJ60	FREDDIE MAC	-	1.90	1.90	9/29/17	6/29/21	73,889	-	-	-	73,889
Federal Agencies	3130ACQ98	FEDERAL HOME LOAN BANK	100,000,000	2.08	2.08	11/1/17	7/1/21	173,333	-	-	-	173,333
Federal Agencies	3134GBM25	FREDDIE MAC	50,000,000	1.92	1.92	10/2/17	7/1/21	80,000	-	-	-	80,000
Federal Agencies	3130ACF33	FEDERAL HOME LOAN BANK	25,000,000	1.88	1.95	9/18/17	9/13/21	39,063	1,544	-	-	40,606
Federal Agencies	3134GUA00	FREDDIE MAC	25,000,000	2.03	2.03	9/11/19	9/13/21	42,292	-	-	-	42,292
Federal Agencies	3134GUA00	FREDDIE MAC	25,000,000	2.03	2.03	9/11/19	9/13/21	42,292	-	-	-	42,292
Federal Agencies	3134GUA00	FREDDIE MAC	25,000,000	2.03	2.03	9/11/19	9/13/21	42,292	-	-	-	42,292
Federal Agencies	3134GUA00	FREDDIE MAC	25,000,000	2.03	2.03	9/11/19	9/13/21	42,292	-	-	-	42,292
Federal Agencies	3134GUAX8	FREDDIE MAC	25,000,000	2.03	2.03	9/13/19	9/13/21	42,292	-	-	-	42,292
Federal Agencies	3134GUAX8	FREDDIE MAC	25,000,000	2.03	2.03	9/13/19	9/13/21	42,292	-	-	-	42,292
Federal Agencies	3134GUAX8	FREDDIE MAC	25,000,000	2.03	2.03	9/13/19	9/13/21	42,292	-	-	-	42,292
Federal Agencies	3130AH5D1	FEDERAL HOME LOAN BANK	100,000,000	2.05	2.05	9/23/19	9/23/21	170,833	-	-	-	170,833
Federal Agencies	3134GUGC8	FREDDIE MAC	33,680,000	2.00	2.00	10/9/19	10/7/21	56,133	-	-	-	56,133
Federal Agencies	3135G0Q89	FANNIE MAE	25,000,000	1.38	1.38	10/21/16	10/7/21	28,646	-	-	-	28,646
Federal Agencies	3133EJK24	FEDERAL FARM CREDIT BANK	25,000,000	3.00	3.03	10/19/18	10/19/21	62,500	540	-	-	63,040
Federal Agencies	3133EGZJ7	FEDERAL FARM CREDIT BANK	14,500,000	1.38	1.38	10/25/16	10/25/21	16,615	-	-	-	16,615
Federal Agencies	3133EGZJ7	FEDERAL FARM CREDIT BANK	15,000,000	1.38	1.38	10/25/16	10/25/21	17,188	-	-	-	17,188
Federal Agencies	3134GULE8	FREDDIE MAC	25,000,000	2.00	2.00	10/28/19	10/28/21	41,667	-	-	-	41,667
Federal Agencies	3134GULE8	FREDDIE MAC	85,675,000	2.00	2.00	10/28/19	10/28/21	142,792	-	-	-	142,792
Federal Agencies	3133EJ174	FEDERAL FARM CREDIT BANK	50,000,000	3.05	3.09	11/15/18	11/15/21	127,083	1,414	-	-	128,498
Federal Agencies	3130AHJY0	FEDERAL HOME LOAN BANK	17,000,000	1.63	1.71	11/8/19	11/19/21	23,021	1,215	-	-	24,235
Federal Agencies	3130AHJY0	FEDERAL HOME LOAN BANK	25,000,000	1.63	1.71	11/8/19	11/19/21	33,854	1,786	-	-	35,640
Federal Agencies	3130AHJY0	FEDERAL HOME LOAN BANK	25,000,000	1.63	1.71	11/8/19	11/19/21	33,854	1,786	-	-	35,640
Federal Agencies	3130AHJY0	FEDERAL HOME LOAN BANK	45,000,000	1.63	1.71	11/8/19	11/19/21	60,938	3,215	-	-	64,152
Federal Agencies	3130AHJY0	FEDERAL HOME LOAN BANK	50,000,000	1.63	1.71	11/8/19	11/19/21	67,708	3,572	-	-	71,280
Federal Agencies	3130ACB60	FEDERAL HOME LOAN BANK	-	2.00	2.00	9/8/17	12/15/21	38,889	-	-	-	38,889
Federal Agencies	3133EJ3B3	FEDERAL FARM CREDIT BANK	25,000,000	2.80	2.84	12/17/18	12/17/21	58,333	728	-	-	59,062
Federal Agencies	3133EJ3B3	FEDERAL FARM CREDIT BANK	25,000,000	2.80	2.84	12/17/18	12/17/21	58,333	728	-	-	59,062
Federal Agencies	3133EJ3B3	FEDERAL FARM CREDIT BANK	25,000,000	2.80	2.85	12/17/18	12/17/21	58,333	1,011	-	-	59,345
Federal Agencies	3130AHSR5	FEDERAL HOME LOAN BANK	22,500,000	1.63	1.68	12/20/19	12/20/21	11,172	399	-	-	11,571
Federal Agencies	3133EKAK2	FEDERAL FARM CREDIT BANK	20,700,000	2.53	2.56	2/19/19	2/14/22	43,643	494	-	-	44,137
Federal Agencies	3133EKBV7	FEDERAL FARM CREDIT BANK	10,000,000	2.55	2.56	3/1/19	3/1/22	21,250	80	-	-	21,330
Federal Agencies	313378WG2	FEDERAL HOME LOAN BANK	17,780,000	2.50	2.36	4/5/19	3/11/22	37,042	(1,997)	-	-	35,045
Federal Agencies	313378WG2	FEDERAL HOME LOAN BANK	40,000,000	2.50	2.36	4/5/19	3/11/22	83,333	(4,584)	-	-	78,750
Federal Agencies	3133EKDC7	FEDERAL FARM CREDIT BANK	26,145,000	2.47	2.36	4/8/19	3/14/22	53,815	(2,346)	-	-	51,469
Federal Agencies	3133EKDC7	FEDERAL FARM CREDIT BANK	45,500,000	2.47	2.36	4/8/19	3/14/22	93,654	(3,898)	-	-	89,756
Federal Agencies	3135G0T45	FANNIE MAE	25,000,000	1.88	1.81	6/6/17	4/5/22	39,063	(1,270)	-	-	37,793
Federal Agencies	3135G0V59	FANNIE MAE	25,000,000	2.25	2.36	4/12/19	4/12/22	46,875	2,319	-	-	49,194
Federal Agencies	3135G0V59	FANNIE MAE	50,000,000	2.25	2.36	4/12/19	4/12/22	93,750	4,639	-	-	98,389
Federal Agencies	3135G0V59	FANNIE MAE	50,000,000	2.25	2.36	4/12/19	4/12/22	93,750	4,639	-	-	98,389
Federal Agencies	3133EKHB5	FEDERAL FARM CREDIT BANK	50,000,000	2.35	2.37	4/18/19	4/18/22	97,917	863	-	-	98,779
Federal Agencies	3133EKLR5	FEDERAL FARM CREDIT BANK	25,000,000	2.25	2.32	5/16/19	5/16/22	46,875	1,435	-	-	48,310
Federal Agencies	3133EKLR5	FEDERAL FARM CREDIT BANK	35,000,000	2.25	2.32	5/16/19	5/16/22	65,625	2,010	-	-	67,635
Federal Agencies	3133EHL7	FEDERAL FARM CREDIT BANK	50,000,000	1.88	1.85	6/6/17	6/2/22	78,125	(1,008)	-	-	77,117
Federal Agencies	3133EHL7	FEDERAL FARM CREDIT BANK	50,000,000	1.88	1.88	6/9/17	6/2/22	78,125	43	-	-	78,168
Federal Agencies	3133ELDK7	FEDERAL FARM CREDIT BANK	20,000,000	1.63	1.63	12/16/19	6/15/22	13,583	19	-	-	13,602
Federal Agencies	3133ELDK7	FEDERAL FARM CREDIT BANK	25,000,000	1.63	1.63	12/16/19	6/15/22	16,979	23	-	-	17,002
Federal Agencies	3133ELDK7	FEDERAL FARM CREDIT BANK	25,000,000	1.63	1.63	12/16/19	6/15/22	16,979	23	-	-	17,002
Federal Agencies	3134GBF72	FREDDIE MAC	-	2.01	2.01	9/15/17	6/15/22	39,083	-	-	-	39,083
Federal Agencies	3134GBN73	FREDDIE MAC	50,000,000	2.07	2.07	10/2/17	7/1/22	86,250	-	-	-	86,250
Federal Agencies	3134GUNR7	FREDDIE MAC	25,000,000	2.00	2.00	11/12/19	8/12/22	41,667	-	-	-	41,667
Federal Agencies	3134GUNR7	FREDDIE MAC	25,000,000	2.00	2.00	11/12/19	8/12/22	41,667	-	-	-	41,667

# Monthly Investment Earnings

## Pooled Fund

Type of Investment	CUSIP	Issuer Name	Par Value	Coupon	YTM <sup>1</sup>	Settle Date	Maturity		Earned Interest	Amort.	Realized	Earned Income
							Date	Date		Expense	Gain/(Loss)	/Net Earnings
Federal Agencies	3134GUNR7	FREDDIE MAC	25,000,000	2.00	2.00	11/12/19	8/12/22	41,667	-	-	41,667	
Federal Agencies	3134GUNR7	FREDDIE MAC	25,000,000	2.00	2.00	11/12/19	8/12/22	41,667	-	-	41,667	
Federal Agencies	3134GUAJ9	FREDDIE MAC	25,000,000	2.09	2.09	9/12/19	9/12/22	43,542	-	-	43,542	
Federal Agencies	3134GUAJ9	FREDDIE MAC	25,000,000	2.09	2.09	9/12/19	9/12/22	43,542	-	-	43,542	
Federal Agencies	3134GUAJ9	FREDDIE MAC	25,000,000	2.09	2.09	9/12/19	9/12/22	43,542	-	-	43,542	
Federal Agencies	3134GUAJ9	FREDDIE MAC	25,000,000	2.09	2.09	9/12/19	9/12/22	43,542	-	-	43,542	
Federal Agencies	3130AH4A8	FEDERAL HOME LOAN BANK	-	2.25	2.25	9/19/19	9/19/22	112,500	-	-	112,500	
Federal Agencies	3130AHD75	FEDERAL HOME LOAN BANK	25,000,000	2.05	2.05	10/17/19	10/17/22	42,708	-	-	42,708	
Federal Agencies	3130AHD75	FEDERAL HOME LOAN BANK	25,000,000	2.05	2.05	10/17/19	10/17/22	42,708	-	-	42,708	
Federal Agencies	3130AHD75	FEDERAL HOME LOAN BANK	25,000,000	2.05	2.05	10/17/19	10/17/22	42,708	-	-	42,708	
Federal Agencies	3130AHD75	FEDERAL HOME LOAN BANK	25,000,000	2.05	2.05	10/17/19	10/17/22	42,708	-	-	42,708	
Federal Agencies	3134GUJN1	FREDDIE MAC	25,000,000	2.10	2.10	10/17/19	10/17/22	43,750	-	-	43,750	
Federal Agencies	3134GUJN1	FREDDIE MAC	25,000,000	2.10	2.10	10/17/19	10/17/22	43,750	-	-	43,750	
Federal Agencies	3134GUJN1	FREDDIE MAC	25,000,000	2.10	2.10	10/17/19	10/17/22	43,750	-	-	43,750	
Federal Agencies	3134GUJN1	FREDDIE MAC	50,000,000	2.10	2.10	10/17/19	10/17/22	87,500	-	-	87,500	
Federal Agencies	3134GULD0	FREDDIE MAC	15,495,000	2.13	2.13	10/23/19	10/21/22	27,439	-	-	27,439	
Federal Agencies	3130AHGS6	FEDERAL HOME LOAN BANK	25,000,000	2.00	2.00	10/30/19	10/28/22	41,667	-	-	41,667	
Federal Agencies	3130AHGS6	FEDERAL HOME LOAN BANK	25,000,000	2.00	2.00	10/30/19	10/28/22	41,667	-	-	41,667	
Federal Agencies	3130AHGS6	FEDERAL HOME LOAN BANK	50,000,000	2.00	2.00	10/30/19	10/28/22	83,333	-	-	83,333	
Federal Agencies	3134GUB33	FREDDIE MAC	50,000,000	2.00	2.00	12/18/19	9/18/23	36,111	-	-	36,111	
Federal Agencies	3134GUTS9	FREDDIE MAC	25,000,000	2.07	2.07	11/20/19	5/20/24	43,125	47	-	43,172	
Federal Agencies	3134GUTS9	FREDDIE MAC	25,000,000	2.07	2.07	11/20/19	5/20/24	43,125	47	-	43,172	
Federal Agencies	3134GUTS9	FREDDIE MAC	25,000,000	2.07	2.07	11/20/19	5/20/24	43,125	47	-	43,172	
Federal Agencies	3134GUTS9	FREDDIE MAC	25,000,000	2.07	2.07	11/20/19	5/20/24	43,125	47	-	43,172	
Federal Agencies	3134GUVL1	FREDDIE MAC	50,000,000	2.00	2.00	11/25/19	5/28/24	83,333	-	-	83,333	
Federal Agencies	3134GUVL1	FREDDIE MAC	50,000,000	2.00	2.00	11/25/19	5/28/24	83,333	-	-	83,333	
Federal Agencies	3130AHSZ7	FEDERAL HOME LOAN BANK	105,500,000	2.05	2.06	12/27/19	6/27/24	24,031	160	-	24,191	
Federal Agencies	3134GUUR9	FREDDIE MAC	25,000,000	2.05	2.05	11/26/19	8/26/24	42,604	-	-	42,604	
Federal Agencies	3134GUUR9	FREDDIE MAC	25,000,000	2.05	2.05	11/26/19	8/26/24	42,604	-	-	42,604	
Federal Agencies	3134GUUR9	FREDDIE MAC	25,000,000	2.05	2.05	11/26/19	8/26/24	42,604	-	-	42,604	
Federal Agencies	3134GUUR9	FREDDIE MAC	25,000,000	2.05	2.05	11/26/19	8/26/24	42,604	-	-	42,604	
Federal Agencies	3134GUVD9	FREDDIE MAC	25,000,000	2.05	2.05	11/27/19	8/27/24	42,708	-	-	42,708	
Federal Agencies	3134GUVD9	FREDDIE MAC	25,000,000	2.05	2.05	11/27/19	8/27/24	42,708	-	-	42,708	
Federal Agencies	3134GUVD9	FREDDIE MAC	25,000,000	2.05	2.05	11/27/19	8/27/24	42,708	-	-	42,708	
Federal Agencies	3134GUVD9	FREDDIE MAC	25,000,000	2.05	2.05	11/27/19	8/27/24	42,708	-	-	42,708	
Federal Agencies	3130AHMR1	FEDERAL HOME LOAN BANK	25,000,000	2.10	2.10	11/27/19	11/27/24	43,750	-	-	43,750	
Federal Agencies	3130AHMR1	FEDERAL HOME LOAN BANK	25,000,000	2.10	2.10	11/27/19	11/27/24	43,750	-	-	43,750	
Federal Agencies	3130AHMR1	FEDERAL HOME LOAN BANK	25,000,000	2.10	2.10	11/27/19	11/27/24	43,750	-	-	43,750	
Federal Agencies	3130AHMR1	FEDERAL HOME LOAN BANK	25,000,000	2.10	2.10	11/27/19	11/27/24	43,750	-	-	43,750	
Federal Agencies	3133ELCP7	FEDERAL FARM CREDIT BANK	25,000,000	1.63	1.66	12/3/19	12/3/24	31,597	635	-	32,232	
Federal Agencies	3134GUYD6	FREDDIE MAC	25,000,000	2.09	2.09	12/10/19	12/10/24	30,479	-	-	30,479	
Federal Agencies	3134GUYD6	FREDDIE MAC	25,000,000	2.09	2.09	12/10/19	12/10/24	30,479	-	-	30,479	
Federal Agencies	3134GUYD6	FREDDIE MAC	25,000,000	2.09	2.09	12/10/19	12/10/24	30,479	-	-	30,479	
Federal Agencies	3134GUYD6	FREDDIE MAC	25,000,000	2.09	2.09	12/10/19	12/10/24	30,479	-	-	30,479	
Federal Agencies	3130AHN58	FEDERAL HOME LOAN BANK	100,000,000	2.15	2.15	12/16/19	12/16/24	89,583	-	-	89,583	
Federal Agencies	3130AHRR6	FEDERAL HOME LOAN BANK	98,545,000	2.10	2.10	12/19/19	12/19/24	68,982	140	-	69,122	
<b>Subtotals</b>			<b>\$ 5,183,190,000</b>					<b>\$ 8,683,747</b>	<b>\$ 213,528</b>	<b>\$ -</b>	<b>\$ 8,897,275</b>	
State/Local Agencies	977100CW4	WISCONSIN ST GEN FUND ANNUAL A	\$ 18,000,000	1.45	1.45	8/16/16	5/1/20	\$ 21,690	\$ -	\$ -	\$ 21,690	
State/Local Agencies	13063DGA0	CALIFORNIA ST	33,000,000	2.80	2.80	4/25/18	4/1/21	77,000	(38)	-	76,962	
State/Local Agencies	13066YTY5	CALIFORNIA ST DEPT OF WTR RESO	27,962,641	1.71	2.30	2/6/17	5/1/21	39,917	9,493	-	49,410	
State/Local Agencies	91412GF59	UNIV OF CALIFORNIA CA REVENUES	1,769,000	1.91	1.40	8/9/16	5/15/21	2,816	(743)	-	2,073	
<b>Subtotals</b>			<b>\$ 80,731,641</b>					<b>\$ 141,422</b>	<b>\$ 8,712</b>	<b>\$ -</b>	<b>\$ 150,135</b>	

# Monthly Investment Earnings

## Pooled Fund

Type of Investment	CUSIP	Issuer Name	Par Value	Coupon	YTM <sup>1</sup>	Settle Date	Maturity		Earned Interest	Amort.	Realized	Earned Income
							Date	Expense		Gain/(Loss)	/Net Earnings	
Public Time Deposits	PP9J6D723	SAN FRANCISCO CREDIT UNION	\$ -	2.33	2.33	6/4/19	12/4/19	\$ 1,918	\$ -	\$ -	\$ 1,918	
Public Time Deposits	PPEQ338W9	BANK OF SAN FRANCISCO	-	2.31	2.31	6/11/19	12/11/19	3,165	-	-	3,165	
Public Time Deposits	PPQD3G113	BRIDGE BANK	-	2.15	2.15	6/24/19	12/23/19	12,987	-	-	12,987	
Public Time Deposits	PP9J79QD6	BRIDGE BANK	10,000,000	1.95	1.95	9/26/19	3/24/20	16,562	-	-	16,562	
Public Time Deposits	PP9N4D668	SAN FRANCISCO CRED UNION	10,000,000	1.59	1.59	12/4/19	6/4/20	12,167	-	-	12,167	
Public Time Deposits	PP9J7XBG2	BANK OF SAN FRANCISCO	5,000,000	1.57	1.57	12/11/19	6/8/20	4,579	-	-	4,579	
Public Time Deposits	PP9W8R1R2	BRIDGE BANK	10,000,000	1.60	1.60	12/23/19	6/23/20	3,945	-	-	3,945	
<b>Subtotals</b>			<b>\$ 35,000,000</b>					<b>\$ 55,324</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ 55,324</b>	
Negotiable CDs	65602VQL3	NORINCHUKIN BANK NY	\$ -	2.25	2.25	8/1/19	12/2/19	\$ 3,125	\$ -	\$ -	\$ 3,125	
Negotiable CDs	06370RPG8	BANK OF MONTREAL CHICAGO	-	3.12	3.12	12/3/18	12/3/19	8,667	-	-	8,667	
Negotiable CDs	89114MPF8	TORONTO DOMINION BANK NY	-	3.10	3.10	12/6/18	12/6/19	21,528	-	-	21,528	
Negotiable CDs	96130ABE7	WESTPAC BANKING CORP NY	-	3.05	3.05	12/7/18	12/6/19	21,181	-	-	21,181	
Negotiable CDs	06370RQD4	BANK OF MONTREAL CHICAGO	-	3.06	3.06	12/6/18	12/9/19	34,000	-	-	34,000	
Negotiable CDs	06370RQZ5	BANK OF MONTREAL CHICAGO	-	3.06	3.06	12/10/18	12/11/19	42,500	-	-	42,500	
Negotiable CDs	06370R3G2	BANK OF MONTREAL CHICAGO	-	2.05	2.05	9/18/19	12/17/19	41,000	-	-	41,000	
Negotiable CDs	06370R4S5	BANK OF MONTREAL CHICAGO	35,000,000	2.05	2.05	10/2/19	1/2/20	61,785	-	-	61,785	
Negotiable CDs	63873NE49	NATIXIS NY BRANCH	50,000,000	3.00	3.00	1/11/19	1/6/20	129,167	-	-	129,167	
Negotiable CDs	78012UNB7	ROYAL BANK OF CANADA NY	25,000,000	2.57	2.57	4/8/19	1/6/20	55,326	-	-	55,326	
Negotiable CDs	78012UNC5	ROYAL BANK OF CANADA NY	25,000,000	2.57	2.57	4/8/19	1/8/20	55,326	-	-	55,326	
Negotiable CDs	89114MB30	TORONTO DOMINION BANK NY	50,000,000	2.60	2.60	4/8/19	1/17/20	111,944	-	-	111,944	
Negotiable CDs	89114NDX0	TORONTO DOMINION BANK NY	40,000,000	2.00	2.00	12/17/19	1/17/20	33,333	-	-	33,333	
Negotiable CDs	65602VRW8	NORINCHUKIN BANK NY	50,000,000	2.11	2.11	9/24/19	1/24/20	90,847	-	-	90,847	
Negotiable CDs	06417G6G8	BANK OF NOVA SCOTIA HOUS	50,000,000	2.57	2.57	4/25/19	2/3/20	110,653	-	-	110,653	
Negotiable CDs	89114MF36	TORONTO DOMINION BANK NY	50,000,000	2.56	2.56	4/24/19	2/3/20	110,222	-	-	110,222	
Negotiable CDs	06417G6H6	BANK OF NOVA SCOTIA HOUS	50,000,000	2.57	2.57	4/25/19	2/5/20	110,653	-	-	110,653	
Negotiable CDs	06417G6K9	BANK OF NOVA SCOTIA HOUS	50,000,000	2.56	2.56	4/29/19	2/6/20	110,222	-	-	110,222	
Negotiable CDs	06367BDP1	BANK OF MONTREAL CHICAGO	50,000,000	2.00	2.00	12/17/19	2/14/20	41,667	-	-	41,667	
Negotiable CDs	96130ABW7	WESTPAC BANKING CORP NY	50,000,000	2.71	2.71	2/15/19	2/14/20	116,681	-	-	116,681	
Negotiable CDs	06417G6L7	BANK OF NOVA SCOTIA HOUS	50,000,000	2.57	2.57	4/29/19	2/19/20	110,653	-	-	110,653	
Negotiable CDs	06417G6V5	BANK OF NOVA SCOTIA HOUS	50,000,000	2.57	2.57	5/6/19	2/21/20	110,653	-	-	110,653	
Negotiable CDs	65602VTH9	NORINCHUKIN BANK NY	75,000,000	1.93	1.93	10/25/19	2/25/20	124,646	-	-	124,646	
Negotiable CDs	96130ACE6	WESTPAC BANKING CORP NY	50,000,000	2.70	2.70	3/6/19	2/26/20	116,250	-	-	116,250	
Negotiable CDs	06367BAK5	BANK OF MONTREAL CHICAGO	35,000,000	1.85	1.85	11/26/19	2/28/20	55,757	-	-	55,757	
Negotiable CDs	06370RUV9	BANK OF MONTREAL CHICAGO	50,000,000	2.68	2.68	3/1/19	3/2/20	115,389	-	-	115,389	
Negotiable CDs	06370RVN6	BANK OF MONTREAL CHICAGO	50,000,000	2.70	2.70	3/5/19	3/2/20	116,250	-	-	116,250	
Negotiable CDs	65602VWG7	NORINCHUKIN BANK NY	25,000,000	1.95	1.95	12/19/19	3/11/20	17,604	-	-	17,604	
Negotiable CDs	06417MBS3	BANK OF NOVA SCOTIA HOUS	100,000,000	2.02	2.02	9/12/19	3/12/20	173,944	-	-	173,944	
Negotiable CDs	65602VVD5	NORINCHUKIN BANK NY	50,000,000	1.87	1.87	11/25/19	3/16/20	80,514	-	-	80,514	
Negotiable CDs	89114N4B8	TORONTO DOMINION BANK NY	75,000,000	2.06	2.06	9/17/19	3/16/20	133,042	-	-	133,042	
Negotiable CDs	65602VUF1	NORINCHUKIN BANK NY	40,000,000	1.89	1.89	11/7/19	3/18/20	65,100	-	-	65,100	
Negotiable CDs	78012UMY8	ROYAL BANK OF CANADA NY	50,000,000	2.58	2.58	4/4/19	3/25/20	111,083	-	-	111,083	
Negotiable CDs	78012UMZ5	ROYAL BANK OF CANADA NY	50,000,000	2.58	2.58	4/4/19	3/30/20	111,083	-	-	111,083	
Negotiable CDs	06370RYS2	BANK OF MONTREAL CHICAGO	65,000,000	2.60	2.60	4/11/19	4/13/20	145,528	-	-	145,528	
Negotiable CDs	65602VSV9	NORINCHUKIN BANK NY	70,500,000	1.95	1.92	11/4/19	4/24/20	118,381	(1,736)	-	116,645	
Negotiable CDs	89114N4G7	TORONTO DOMINION BANK NY	40,000,000	2.05	2.05	9/18/19	4/24/20	70,611	-	-	70,611	
Negotiable CDs	06417MCD5	BANK OF NOVA SCOTIA HOUS	100,000,000	2.03	2.03	9/18/19	4/27/20	174,806	-	-	174,806	
Negotiable CDs	65602VTE6	NORINCHUKIN BANK NY	50,000,000	1.94	1.94	10/29/19	4/28/20	83,528	-	-	83,528	
Negotiable CDs	65602VTL0	NORINCHUKIN BANK NY	75,000,000	1.93	1.93	10/30/19	4/30/20	124,646	-	-	124,646	
Negotiable CDs	78012UQY4	ROYAL BANK OF CANADA NY	100,000,000	2.02	2.02	9/17/19	5/11/20	173,944	-	-	173,944	
Negotiable CDs	89114NCH6	TORONTO DOMINION BANK NY	50,000,000	1.86	1.86	12/6/19	5/13/20	67,167	-	-	67,167	
Negotiable CDs	89114NB20	TORONTO DOMINION BANK NY	60,000,000	1.83	1.83	11/19/19	6/22/20	94,550	-	-	94,550	
Negotiable CDs	06417MFP5	BANK OF NOVA SCOTIA HOUS	50,000,000	1.85	1.85	12/5/19	7/1/20	69,375	-	-	69,375	
Negotiable CDs	89114NA54	TORONTO DOMINION BANK NY	50,000,000	1.86	1.86	11/6/19	7/1/20	80,083	-	-	80,083	

# Monthly Investment Earnings

## Pooled Fund

Type of Investment	CUSIP	Issuer Name	Par Value	Coupon	YTM <sup>1</sup>	Settle Date	Maturity		Earned Interest	Amort.	Realized	Earned Income
							Date	Expense		Gain/(Loss)	/Net Earnings	
Negotiable CDs	96121T4A3	WESTPAC BANKING CORP NY	28,790,000	2.05	1.87	11/12/19	8/3/20	49,183	(4,378)	-	-	44,805
Negotiable CDs	06367BAC3	BANK OF MONTREAL CHICAGO	50,000,000	2.00	2.00	11/25/19	9/2/20	86,013	-	-	-	86,013
Negotiable CDs	89114N5H4	TORONTO DOMINION BANK NY	100,000,000	2.08	2.08	9/25/19	9/24/20	174,508	-	-	-	174,508
Negotiable CDs	06417MCW3	BANK OF NOVA SCOTIA HOUS	50,000,000	2.13	2.13	9/27/19	9/28/20	87,337	-	-	-	87,337
Negotiable CDs	89114N5M3	TORONTO DOMINION BANK NY	50,000,000	2.12	2.12	9/27/19	9/28/20	88,024	-	-	-	88,024
Negotiable CDs	06417MDE2	BANK OF NOVA SCOTIA HOUS	50,000,000	2.04	2.04	10/3/19	10/9/20	88,382	-	-	-	88,382
Negotiable CDs	89114N6E0	TORONTO DOMINION BANK NY	50,000,000	2.04	2.04	10/1/19	10/9/20	88,382	-	-	-	88,382
Negotiable CDs	06370R6W4	BANK OF MONTREAL CHICAGO	50,000,000	2.05	2.05	11/13/19	10/26/20	88,176	-	-	-	88,176
Negotiable CDs	96130ADY1	WESTPAC BANKING CORP NY	50,000,000	2.08	2.08	10/30/19	10/28/20	85,184	-	-	-	85,184
Negotiable CDs	78012URS6	ROYAL BANK OF CANADA NY	35,000,000	2.02	2.02	12/3/19	12/3/20	56,826	-	-	-	56,826
Negotiable CDs	06367BBD0	BANK OF MONTREAL CHICAGO	50,000,000	1.85	1.85	12/3/19	12/4/20	74,514	-	-	-	74,514
Negotiable CDs	96130AEP9	WESTPAC BANKING CORP NY	50,000,000	2.04	2.04	12/6/19	12/9/20	73,563	-	-	-	73,563
Negotiable CDs	96130AET1	WESTPAC BANKING CORP NY	75,000,000	1.86	1.86	12/13/19	12/14/20	73,625	-	-	-	73,625
<b>Subtotals</b>			<b>\$ 2,724,290,000</b>					<b>\$ 5,068,129</b>	<b>\$ (6,114)</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ 5,062,015</b>
Commercial Paper	62479MZP1	MUFG BANK LTD NY	\$ -	0.00	2.23	7/26/19	12/23/19	\$ -	\$ 81,033	\$ -	\$ -	\$ 81,033
Commercial Paper	62479LAT2	MUFG BANK LTD NY	50,000,000	0.00	2.09	9/27/19	1/27/20	-	89,556	-	-	89,556
Commercial Paper	62479LAX3	MUFG BANK LTD NY	40,000,000	0.00	2.07	8/28/19	1/31/20	-	70,611	-	-	70,611
Commercial Paper	62479LBT1	MUFG BANK LTD NY	50,000,000	0.00	2.07	9/30/19	2/27/20	-	88,264	-	-	88,264
Commercial Paper	62479LC45	MUFG BANK LTD NY	15,000,000	0.00	1.93	10/24/19	3/4/20	-	24,800	-	-	24,800
Commercial Paper	62479LC45	MUFG BANK LTD NY	25,000,000	0.00	1.98	10/7/19	3/4/20	-	42,194	-	-	42,194
Commercial Paper	62479LC60	MUFG BANK LTD NY	50,000,000	0.00	2.05	9/11/19	3/6/20	-	87,403	-	-	87,403
Commercial Paper	62479LCG8	MUFG BANK LTD NY	75,000,000	0.00	1.98	10/7/19	3/16/20	-	126,583	-	-	126,583
Commercial Paper	89233GCH7	TOYOTA MOTOR CREDIT CORP	50,000,000	0.00	2.07	9/18/19	3/17/20	-	88,264	-	-	88,264
Commercial Paper	89233GCJ3	TOYOTA MOTOR CREDIT CORP	50,000,000	0.00	2.02	9/24/19	3/18/20	-	86,111	-	-	86,111
Commercial Paper	89233GD11	TOYOTA MOTOR CREDIT CORP	50,000,000	0.00	1.90	11/25/19	4/1/20	-	81,375	-	-	81,375
Commercial Paper	89233GEN2	TOYOTA MOTOR CREDIT CORP	50,000,000	0.00	1.89	11/25/19	5/22/20	-	80,514	-	-	80,514
Commercial Paper	89233GEN2	TOYOTA MOTOR CREDIT CORP	65,000,000	0.00	1.88	12/2/19	5/22/20	-	100,750	-	-	100,750
Commercial Paper	89233GET9	TOYOTA MOTOR CREDIT CORP	40,000,000	0.00	1.88	12/2/19	5/27/20	-	62,000	-	-	62,000
Commercial Paper	62479LF59	MUFG BANK LTD NY	25,000,000	0.00	2.07	9/24/19	6/5/20	-	43,917	-	-	43,917
Commercial Paper	62479LFA8	MUFG BANK LTD NY	40,000,000	0.00	1.92	12/30/19	6/10/20	-	4,222	-	-	4,222
Commercial Paper	62479LFF7	MUFG BANK LTD NY	50,000,000	0.00	2.07	9/24/19	6/15/20	-	87,833	-	-	87,833
Commercial Paper	62479LG17	MUFG BANK LTD NY	60,000,000	0.00	1.96	10/25/19	7/1/20	-	99,717	-	-	99,717
Commercial Paper	62479LG17	MUFG BANK LTD NY	75,000,000	0.00	1.95	10/21/19	7/1/20	-	124,000	-	-	124,000
Commercial Paper	89233GG18	TOYOTA MOTOR CREDIT CORP	50,000,000	0.00	1.89	11/6/19	7/1/20	-	80,514	-	-	80,514
Commercial Paper	89233GG18	TOYOTA MOTOR CREDIT CORP	50,000,000	0.00	1.88	12/9/19	7/1/20	-	59,417	-	-	59,417
Commercial Paper	89233GHH2	TOYOTA MOTOR CREDIT CORP	50,000,000	0.00	1.83	12/6/19	8/17/20	-	65,361	-	-	65,361
Commercial Paper	62479LHR9	MUFG BANK LTD NY	45,000,000	0.00	1.90	12/10/19	8/25/20	-	51,425	-	-	51,425
<b>Subtotals</b>			<b>\$ 1,055,000,000</b>					<b>\$ -</b>	<b>\$ 1,725,864</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ 1,725,864</b>
Medium Term Notes	89236TEJ0	TOYOTA MOTOR CREDIT CORP	\$ 20,000,000	2.20	2.25	1/12/38	1/12/40	\$ 36,667	\$ 757	\$ -	\$ -	\$ 37,424
Medium Term Notes	89236TFQ3	TOYOTA MOTOR CREDIT CORP	5,000,000	3.05	3.08	1/9/39	1/10/41	12,708	127	-	-	12,836
<b>Subtotals</b>			<b>\$ 25,000,000</b>					<b>\$ 49,375</b>	<b>\$ 884</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ 50,259</b>
Money Market Funds	262006208	DREYFUS GOVERN CASH MGMT-I	\$ 10,536,800	1.52	1.52	12/31/19	1/1/20	\$ 13,568	\$ -	\$ -	\$ -	\$ 13,568
Money Market Funds	608919718	FEDERATED GOVERNMENT OBL-PRM	66,956,887	1.53	1.53	12/31/19	1/1/20	187,896	-	-	-	187,896
Money Market Funds	09248U718	BLACKROCK LIQ INST GOV FUND	10,506,961	1.51	1.51	12/31/19	1/1/20	13,443	-	-	-	13,443
Money Market Funds	31607A703	FIDELITY INST GOV FUND	592,395,803	1.55	1.55	12/31/19	1/1/20	915,434	-	-	-	915,434
Money Market Funds	61747C707	MORGAN STANLEY INST GOVT FUND	11,344,859	1.52	1.52	12/31/19	1/1/20	14,646	-	-	-	14,646
<b>Subtotals</b>			<b>\$ 691,741,310</b>					<b>\$ 1,144,986</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ 1,144,986</b>

## Monthly Investment Earnings Pooled Fund

Type of Investment	CUSIP	Issuer Name	Par Value	Coupon	YTM <sup>1</sup>	Settle Date	Maturity		Earned Interest	Amort.	Realized	Earned Income
							Date	Expense		Gain/(Loss)	/Net Earnings	
Supranationals	459052RX6	INTL BK RECON & DEVELOP DISC	\$ 20,000,000	0.00	2.42	4/24/19	1/17/20	\$ -	\$ 40,989	\$ -	\$ 40,989	
Supranationals	459052SC1	INTL BK RECON & DEVELOP DISC	40,000,000	0.00	2.42	4/24/19	1/22/20	-	81,978	-	81,978	
Supranationals	459052SH0	INTL BK RECON & DEVELOP DISC	25,000,000	0.00	1.86	10/3/19	1/27/20	-	39,826	-	39,826	
Supranationals	459052SH0	INTL BK RECON & DEVELOP DISC	50,000,000	0.00	1.86	10/3/19	1/27/20	-	79,653	-	79,653	
Supranationals	459052SJ6	INTL BK RECON & DEVELOP DISC	100,000,000	0.00	1.86	10/2/19	1/28/20	-	159,306	-	159,306	
Supranationals	459058FZ1	INTL BK RECON & DEVELOP	50,000,000	1.88	1.94	3/21/17	4/21/20	78,167	1,197	-	79,363	
Supranationals	4581X0CX4	INTER-AMERICAN DEVEL BK	10,000,000	1.63	2.72	5/17/18	5/12/20	13,542	8,994	-	22,536	
Supranationals	4581X0CX4	INTER-AMERICAN DEVEL BK	25,000,000	1.63	1.72	4/12/17	5/12/20	33,854	1,631	-	35,485	
Supranationals	459052XW1	INTL BK RECON & DEVELOP DISC	100,000,000	0.00	1.61	12/11/19	6/8/20	-	93,333	-	93,333	
Supranationals	459058GA5	INTL BK RECON & DEVELOP	50,000,000	1.63	1.64	8/29/17	9/4/20	67,750	295	-	68,045	
Supranationals	45905UQ80	INTL BK RECON & DEVELOP	50,000,000	1.95	1.97	11/9/17	11/9/20	81,250	990	-	82,240	
Supranationals	45905UQ80	INTL BK RECON & DEVELOP	50,000,000	1.95	2.15	12/20/17	11/9/20	81,250	8,272	-	89,522	
Supranationals	45950KCM0	INTERNATIONAL FINANCE CORP	50,000,000	2.25	2.35	1/25/18	1/25/21	93,750	4,158	-	97,908	
Supranationals	4581X0DB1	INTER-AMERICAN DEVEL BK	45,000,000	2.63	2.70	4/19/18	4/19/21	98,438	2,800	-	101,238	
Supranationals	4581X0DB1	INTER-AMERICAN DEVEL BK	50,000,000	2.63	2.84	5/16/18	4/19/21	109,375	8,875	-	118,250	
Supranationals	45950KCJ7	INTERNATIONAL FINANCE CORP	12,135,000	1.13	2.97	5/23/18	7/20/21	11,387	17,140	-	28,527	
Supranationals	459058GH0	INTL BK RECON & DEVELOP	50,000,000	2.75	2.85	7/25/18	7/23/21	114,583	3,315	-	117,899	
<b>Subtotals</b>			<b>\$ 777,135,000</b>					<b>\$ 783,345</b>	<b>\$ 552,752</b>	<b>\$ -</b>	<b>\$ 1,336,097</b>	
<b>Grand Totals</b>			<b>\$ 12,432,087,950</b>					<b>\$ 18,744,536</b>	<b>\$ 2,438,197</b>	<b>\$ -</b>	<b>\$ 21,182,732</b>	

<sup>1</sup> Yield to maturity is calculated at purchase

# Investment Transactions

## Pooled Fund

For month ended December 31, 2019

Transaction	Settle Date	Maturity	Type of Investment	Issuer Name	CUSIP	Par Value	Coupon	YTM	Price	Interest	Transaction
Purchase	12/2/19	5/22/20	Commercial Paper	TOYOTA MOTOR CREDIT CORP	89233GEN2	\$ 65,000,000	0.00	1.88	\$ 99.11	\$ -	\$ 64,422,367
Purchase	12/2/19	5/27/20	Commercial Paper	TOYOTA MOTOR CREDIT CORP	89233GET9	40,000,000	0.00	1.88	99.09	-	39,634,200
Purchase	12/3/19	12/3/20	Negotiable CDs	ROYAL BANK OF CANADA NY	78012URS6	35,000,000	2.02	2.02	100.00	-	35,000,000
Purchase	12/3/19	12/4/20	Negotiable CDs	BANK OF MONTREAL CHICAGO	06367BBD0	50,000,000	1.85	1.85	100.00	-	50,000,000
Purchase	12/3/19	1/15/21	U.S. Treasuries	US TREASURY	9128283Q1	50,000,000	2.00	1.68	100.35	383,152	50,558,933
Purchase	12/3/19	6/30/21	U.S. Treasuries	US TREASURY	9128287A2	50,000,000	1.63	1.67	99.94	344,429	50,313,179
Purchase	12/3/19	12/3/24	Federal Agencies	FEDERAL FARM CREDIT BANK	3133ELCP7	25,000,000	0.00	0.03	99.84	-	24,960,000
Purchase	12/4/19	1/1/20	Money Market Funds	FEDERATED GOVERNMENT OBL	608919718	110,000,000	1.54	1.53	100.00	-	110,000,000
Purchase	12/4/19	6/4/20	Public Time Deposits	SAN FRANCISCO CRED UNION	PP9N4D668	10,000,000	1.65	1.65	100.00	-	10,000,000
Purchase	12/5/19	7/1/20	Negotiable CDs	BANK OF NOVA SCOTIA HOUS	06417MFP5	50,000,000	1.85	1.85	100.00	-	50,000,000
Purchase	12/6/19	1/1/20	Money Market Funds	FEDERATED GOVERNMENT OBL	608919718	100,000,000	1.54	1.53	100.00	-	100,000,000
Purchase	12/6/19	1/1/20	Money Market Funds	FIDELITY INST GOV FUND	31607A703	40,000,000	1.55	1.55	100.00	-	40,000,000
Purchase	12/6/19	5/13/20	Negotiable CDs	TORONTO DOMINION BANK NY	89114NCH6	50,000,000	1.86	1.86	100.00	-	50,000,000
Purchase	12/6/19	8/17/20	Commercial Paper	TOYOTA MOTOR CREDIT CORP	89233GHH2	50,000,000	0.00	1.83	98.72	-	49,358,958
Purchase	12/6/19	12/9/20	Negotiable CDs	WESTPAC BANKING CORP NY	96130AEP9	50,000,000	2.04	2.04	100.00	-	50,000,000
Purchase	12/6/19	3/15/21	U.S. Treasuries	US TREASURY	9128284B3	50,000,000	2.38	1.66	100.90	267,514	50,716,732
Purchase	12/9/19	7/1/20	Commercial Paper	TOYOTA MOTOR CREDIT CORP	89233GG18	50,000,000	0.00	1.88	98.94	-	49,470,417
Purchase	12/9/19	4/15/21	U.S. Treasuries	US TREASURY	9128284G2	50,000,000	2.38	1.68	100.93	178,449	50,641,340
Purchase	12/9/19	6/30/21	U.S. Treasuries	US TREASURY	9128287A2	50,000,000	1.63	1.65	99.96	357,677	50,336,192
Purchase	12/9/19	8/31/21	U.S. Treasuries	US TREASURY	912828YC8	50,000,000	1.50	1.66	99.73	206,044	50,071,278
Purchase	12/10/19	12/31/19	U.S. Treasuries	TREASURY BILL	912796WL9	50,000,000	0.00	1.54	99.91	-	49,955,010
Purchase	12/10/19	8/25/20	Commercial Paper	MUFG BANK LTD NY	62479LHR9	45,000,000	0.00	1.90	98.65	-	44,394,588
Purchase	12/10/19	12/10/24	Federal Agencies	FREDDIE MAC	3134GUYD6	25,000,000	2.09	2.09	100.00	-	25,000,000
Purchase	12/10/19	12/10/24	Federal Agencies	FREDDIE MAC	3134GUYD6	25,000,000	2.09	2.09	100.00	-	25,000,000
Purchase	12/10/19	12/10/24	Federal Agencies	FREDDIE MAC	3134GUYD6	25,000,000	2.09	2.09	100.00	-	25,000,000
Purchase	12/10/19	12/10/24	Federal Agencies	FREDDIE MAC	3134GUYD6	25,000,000	2.09	2.09	100.00	-	25,000,000
Purchase	12/11/19	6/8/20	Supranationals	INTL BK RECON & DEVELOP	459052XW1	100,000,000	0.00	1.61	99.20	-	99,200,000
Purchase	12/11/19	6/8/20	Public Time Deposits	BANK OF SAN FRANCISCO	PP9J7XBG2	5,000,000	1.57	1.57	100.00	-	5,000,000
Purchase	12/11/19	4/15/21	U.S. Treasuries	US TREASURY	9128284G2	50,000,000	2.38	1.68	100.91	184,939	50,641,970
Purchase	12/11/19	6/15/21	U.S. Treasuries	US TREASURY	9128284T4	50,000,000	2.63	1.69	101.39	641,906	51,339,171
Purchase	12/11/19	9/30/21	U.S. Treasuries	US TREASURY	912828T34	50,000,000	1.13	1.69	99.00	110,656	49,608,703
Purchase	12/12/19	7/15/21	U.S. Treasuries	US TREASURY	912828Y20	50,000,000	2.63	1.69	101.46	534,986	51,263,502
Purchase	12/13/19	1/1/20	Money Market Funds	BLACKROCK LIQ INST GOV F	09248U718	21	1.51	1.51	100.00	-	21
Purchase	12/13/19	1/1/20	Money Market Funds	FIDELITY INST GOV FUND	31607A703	36,000,000	1.55	1.55	100.00	-	36,000,000
Purchase	12/13/19	12/14/20	Negotiable CDs	WESTPAC BANKING CORP NY	96130AET1	75,000,000	1.86	1.86	100.00	-	75,000,000
Purchase	12/16/19	6/15/22	Federal Agencies	FEDERAL FARM CREDIT BANK	3133ELDK7	20,000,000	1.63	1.63	99.99	-	19,998,940
Purchase	12/16/19	6/15/22	Federal Agencies	FEDERAL FARM CREDIT BANK	3133ELDK7	25,000,000	1.63	1.63	99.99	-	24,998,676
Purchase	12/16/19	6/15/22	Federal Agencies	FEDERAL FARM CREDIT BANK	3133ELDK7	25,000,000	1.63	1.63	99.99	-	24,998,676
Purchase	12/16/19	12/16/24	Federal Agencies	FEDERAL HOME LOAN BANK	3130AHN58	100,000,000	2.15	2.15	100.00	-	100,000,000
Purchase	12/17/19	1/17/20	Negotiable CDs	TORONTO DOMINION BANK NY	89114NDX0	40,000,000	2.00	2.00	100.00	-	40,000,000
Purchase	12/17/19	2/14/20	Negotiable CDs	BANK OF MONTREAL CHICAGO	06367BDP1	50,000,000	2.00	2.00	100.00	-	50,000,000
Purchase	12/17/19	11/15/23	U.S. Treasuries	US TREASURY	912828WE6	50,000,000	2.75	1.71	103.92	120,879	52,081,817
Purchase	12/18/19	6/15/21	U.S. Treasuries	US TREASURY	9128284T4	50,000,000	2.63	1.65	101.43	10,758	50,725,602
Purchase	12/18/19	9/18/23	Federal Agencies	FREDDIE MAC	3134GUB33	50,000,000	2.00	2.00	100.00	-	50,000,000
Purchase	12/19/19	3/11/20	Negotiable CDs	NORINCHUKIN BANK NY	65602VWG7	25,000,000	1.95	1.95	100.00	-	25,000,000
Purchase	12/19/19	12/19/24	Federal Agencies	FEDERAL HOME LOAN BANK	3130AHRR6	98,545,000	2.10	2.10	99.98	-	98,525,291
Purchase	12/20/19	12/20/21	Federal Agencies	FEDERAL HOME LOAN BANK	3130AHSR5	22,500,000	1.63	1.68	99.89	-	22,475,700
Purchase	12/23/19	6/23/20	Public Time Deposits	BRIDGE BANK	PP9W8R1R2	10,000,000	1.60	1.60	100.00	-	10,000,000
Purchase	12/24/19	1/1/20	Money Market Funds	FIDELITY INST GOV FUND	31607A703	28,000,000	1.55	1.55	100.00	-	28,000,000
Purchase	12/27/19	6/27/24	Federal Agencies	FEDERAL HOME LOAN BANK	3130AHSZ7	105,500,000	2.05	2.06	99.95	-	105,447,250
Purchase	12/30/19	1/1/20	Money Market Funds	FIDELITY INST GOV FUND	31607A703	129,000,000	1.55	1.55	100.00	-	129,000,000
Purchase	12/30/19	6/10/20	Commercial Paper	MUFG BANK LTD NY	62479LFA8	40,000,000	0.00	1.92	99.14	-	39,655,889

# Investment Transactions

## Pooled Fund

Transaction	Settle Date	Maturity	Type of Investment	Issuer Name	CUSIP	Par Value	Coupon	YTM	Price	Interest	Transaction
Purchase	12/31/19	1/1/20	Money Market Funds	DREYFUS GOVERN CASH MGMT	262006208	13,568	1.52	1.52	100.00	-	13,568
Purchase	12/31/19	1/1/20	Money Market Funds	FEDERATED GOVERNMENT OBL	608919718	187,896	1.54	1.53	100.00	-	187,896
Purchase	12/31/19	1/1/20	Money Market Funds	BLACKROCK LIQ INST GOV F	09248U718	13,422	1.51	1.51	100.00	-	13,422
Purchase	12/31/19	1/1/20	Money Market Funds	FIDELITY INST GOV FUND	31607A703	915,434	1.55	1.55	100.00	-	915,434
Purchase	12/31/19	1/1/20	Money Market Funds	MORGAN STANLEY INST GOVT	61747C707	14,646	1.52	1.52	100.00	-	14,646
<b>Subtotals</b>						<b>\$2,505,689,986</b>	<b>1.57</b>	<b>1.77</b>	<b>\$ 100.04</b>	<b>\$ 3,341,389</b>	<b>\$2,509,939,367</b>
Sale	12/3/19	1/1/20	Money Market Funds	FIDELITY INST GOV FUND	31607A703	\$ 70,000,000	1.55	1.55	\$ 100.00	\$ -	\$ 70,000,000
Sale	12/9/19	1/1/20	Money Market Funds	FIDELITY INST GOV FUND	31607A703	150,000,000	1.55	1.55	100.00	-	150,000,000
Sale	12/11/19	1/1/20	Money Market Funds	FEDERATED GOVERNMENT OBL	608919718	100,000,000	1.54	1.53	100.00	-	100,000,000
Sale	12/16/19	1/1/20	Money Market Funds	FEDERATED GOVERNMENT OBL	608919718	115,000,000	1.54	1.53	100.00	-	115,000,000
Sale	12/17/19	1/1/20	Money Market Funds	FEDERATED GOVERNMENT OBL	608919718	15,000,000	1.54	1.53	100.00	-	15,000,000
Sale	12/18/19	1/1/20	Money Market Funds	FIDELITY INST GOV FUND	31607A703	110,000,000	1.55	1.55	100.00	-	110,000,000
Sale	12/19/19	1/1/20	Money Market Funds	FIDELITY INST GOV FUND	31607A703	30,000,000	1.55	1.55	100.00	-	30,000,000
Sale	12/23/19	1/1/20	Money Market Funds	FEDERATED GOVERNMENT OBL	608919718	12,000,000	1.54	1.53	100.00	-	12,000,000
Sale	12/23/19	1/1/20	Money Market Funds	FIDELITY INST GOV FUND	31607A703	100,000,000	1.55	1.55	100.00	-	100,000,000
Sale	12/26/19	1/1/20	Money Market Funds	FIDELITY INST GOV FUND	31607A703	43,000,000	1.55	1.55	100.00	-	43,000,000
Sale	12/27/19	1/1/20	Money Market Funds	FIDELITY INST GOV FUND	31607A703	16,000,000	1.55	1.55	100.00	-	16,000,000
Sale	12/31/19	1/1/20	Money Market Funds	FIDELITY INST GOV FUND	31607A703	28,000,000	1.55	1.55	100.00	-	28,000,000
<b>Subtotals</b>						<b>\$ 789,000,000</b>	<b>1.54</b>	<b>1.54</b>	<b>\$ 100.00</b>	<b>\$ -</b>	<b>\$ 789,000,000</b>
Call	12/1/19	7/1/20	Federal Agencies	FREDDIE MAC	3134GB5M0	\$ 50,000,000	1.96	1.96	100.00	\$ -	\$ 50,000,000
Call	12/10/19	9/10/20	Federal Agencies	FEDERAL HOME LOAN BANK	3130AH2K8	50,000,000	2.05	2.05	100.00	-	50,000,000
Call	12/10/19	9/10/20	Federal Agencies	FEDERAL HOME LOAN BANK	3130AH2K8	50,000,000	2.05	2.05	100.00	-	50,000,000
Call	12/15/19	12/15/21	Federal Agencies	FEDERAL HOME LOAN BANK	3130ACB60	50,000,000	2.00	2.00	100.00	-	50,000,000
Call	12/15/19	6/15/22	Federal Agencies	FREDDIE MAC	3134GBF72	50,000,000	2.01	2.01	100.00	-	50,000,000
Call	12/19/19	9/19/22	Federal Agencies	FEDERAL HOME LOAN BANK	3130AH4A8	100,000,000	2.25	2.25	100.00	-	100,000,000
Call	12/29/19	6/29/21	Federal Agencies	FREDDIE MAC	3134GBJ60	50,000,000	1.90	1.90	100.00	-	50,000,000
Call	12/30/19	6/30/20	Federal Agencies	FANNIE MAE	3136G3TG0	15,000,000	1.75	1.75	100.00	-	15,000,000
<b>Subtotals</b>						<b>\$ 415,000,000</b>	<b>2.05</b>	<b>2.05</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ 415,000,000</b>
Maturity	12/2/19	12/2/19	Federal Agencies	FED HOME LN DISCOUNT NT	313384PZ6	\$ 80,000,000	0.00	1.53	100.00	\$ -	\$ 80,000,000
Maturity	12/2/19	12/2/19	Federal Agencies	FEDERAL FARM CREDIT BANK	3133EGN43	50,000,000	1.95	1.94	100.00	81,037	50,081,037
Maturity	12/2/19	12/2/19	Negotiable CDs	NORINCHUKIN BANK NY	65602VQL3	50,000,000	2.25	2.25	100.00	384,375	50,384,375
Maturity	12/3/19	12/3/19	Negotiable CDs	BANK OF MONTREAL CHICAGO	06370RPG8	50,000,000	3.12	3.12	100.00	1,581,667	51,581,667
Maturity	12/4/19	12/4/19	Public Time Deposits	SAN FRANCISCO CREDIT UNI	PP9J6D723	10,000,000	2.33	2.33	100.00	59,261	10,059,261
Maturity	12/6/19	12/6/19	Negotiable CDs	TORONTO DOMINION BANK NY	89114MPF8	50,000,000	3.10	3.10	100.00	1,571,528	51,571,528
Maturity	12/6/19	12/6/19	Negotiable CDs	WESTPAC BANKING CORP NY	96130ABE7	50,000,000	3.05	3.05	100.00	1,541,944	51,541,944
Maturity	12/9/19	12/9/19	Negotiable CDs	BANK OF MONTREAL CHICAGO	06370RQD4	50,000,000	3.06	3.06	100.00	1,564,000	51,564,000
Maturity	12/11/19	12/11/19	Negotiable CDs	BANK OF MONTREAL CHICAGO	06370RQZ5	50,000,000	3.06	3.06	100.00	1,555,500	51,555,500
Maturity	12/11/19	12/11/19	Public Time Deposits	BANK OF SAN FRANCISCO	PPEQ338W9	5,000,000	2.31	2.31	100.00	28,311	5,028,311
Maturity	12/13/19	12/13/19	Federal Agencies	FEDERAL HOME LOAN BANK	3130A0JR2	11,360,000	2.38	1.90	100.00	134,900	11,494,900
Maturity	12/13/19	12/13/19	Federal Agencies	FEDERAL HOME LOAN BANK	3130A0JR2	20,000,000	2.38	1.90	100.00	237,500	20,237,500
Maturity	12/13/19	12/13/19	Federal Agencies	FEDERAL HOME LOAN BANK	3130A0JR2	40,000,000	2.38	1.90	100.00	475,000	40,475,000
Maturity	12/17/19	12/17/19	Negotiable CDs	BANK OF MONTREAL CHICAGO	06370R3G2	45,000,000	2.05	2.05	100.00	230,625	45,230,625
Maturity	12/23/19	12/23/19	Commercial Paper	MUFG BANK LTD NY	62479MZP1	60,000,000	0.00	2.23	100.00	-	60,000,000
Maturity	12/23/19	12/23/19	Public Time Deposits	BRIDGE BANK	PPQD3GI13	10,000,000	2.16	2.15	100.00	110,741	10,110,741
Maturity	12/31/19	12/31/19	U.S. Treasuries	TREASURY BILL	912796WL9	50,000,000	0.00	1.54	100.00	-	50,000,000
Maturity	12/31/19	12/31/19	U.S. Treasuries	US TREASURY	9128283N8	50,000,000	1.88	2.01	100.00	468,750	50,468,750
<b>Subtotals</b>						<b>\$ 731,360,000</b>	<b>1.90</b>	<b>2.32</b>	<b>\$ -</b>	<b>\$ 10,025,138</b>	<b>\$ 741,385,138</b>
Interest	12/1/19	7/1/20	Federal Agencies	FREDDIE MAC	3134GB5M0	\$ 50,000,000	1.96	1.96	0.00	0.00	\$ 490,000
Interest	12/2/19	11/2/20	Federal Agencies	FARMER MAC	3132X0KR1	25,000,000	1.99	1.98	0.00	0.00	41,352
Interest	12/2/19	6/2/22	Federal Agencies	FEDERAL FARM CREDIT BANK	3133EHLY7	50,000,000	1.88	1.85	0.00	0.00	468,750

# Investment Transactions

## Pooled Fund

Transaction	Settle Date	Maturity	Type of Investment	Issuer Name	CUSIP	Par Value	Coupon	YTM	Price	Interest	Transaction
Interest	12/2/19	6/2/22	Federal Agencies	FEDERAL FARM CREDIT BANK	3133EHL7	50,000,000	1.88	1.88	0.00	0.00	468,750
Interest	12/9/19	10/9/20	Negotiable CDs	BANK OF NOVA SCOTIA HOUS	06417MDE2	50,000,000	2.09	2.09	0.00	0.00	78,338
Interest	12/9/19	10/9/20	Negotiable CDs	TORONTO DOMINION BANK NY	89114N6E0	50,000,000	2.09	2.09	0.00	0.00	78,338
Interest	12/10/19	9/10/20	Federal Agencies	FEDERAL HOME LOAN BANK	3130AH2K8	50,000,000	2.05	2.05	0.00	0.00	256,250
Interest	12/10/19	9/10/20	Federal Agencies	FEDERAL HOME LOAN BANK	3130AH2K8	50,000,000	2.05	2.05	0.00	0.00	256,250
Interest	12/11/19	12/11/20	Federal Agencies	FEDERAL HOME LOAN BANK	3130A3UQ5	50,000,000	1.88	2.02	0.00	0.00	93,750
Interest	12/13/19	1/1/20	Money Market Funds	BLACKROCK LIQ INST GOV F	09248U718	10,493,539	1.51	1.51	0.00	0.00	21
Interest	12/15/19	6/15/20	Federal Agencies	FEDERAL FARM CREDIT BANK	3133EHNK5	25,000,000	1.54	1.54	0.00	0.00	192,500
Interest	12/15/19	6/15/20	Federal Agencies	FEDERAL FARM CREDIT BANK	3133EHNK5	26,900,000	1.54	1.55	0.00	0.00	207,130
Interest	12/15/19	6/15/20	U.S. Treasuries	US TREASURY	912828XU9	50,000,000	1.50	1.51	0.00	0.00	375,000
Interest	12/15/19	6/15/20	U.S. Treasuries	US TREASURY	912828XU9	50,000,000	1.50	2.39	0.00	0.00	375,000
Interest	12/15/19	6/15/20	U.S. Treasuries	US TREASURY	912828XU9	100,000,000	1.50	2.67	0.00	0.00	750,000
Interest	12/15/19	12/15/20	Federal Agencies	FARMER MAC	3132X0ZY0	12,750,000	2.05	2.07	0.00	0.00	130,688
Interest	12/15/19	12/15/20	U.S. Treasuries	US TREASURY	9128283L2	50,000,000	1.88	1.63	0.00	0.00	468,750
Interest	12/15/19	12/15/20	U.S. Treasuries	US TREASURY	9128283L2	50,000,000	1.88	1.65	0.00	0.00	468,750
Interest	12/15/19	6/15/21	U.S. Treasuries	US TREASURY	9128284T4	50,000,000	2.63	1.66	0.00	0.00	656,250
Interest	12/15/19	6/15/21	U.S. Treasuries	US TREASURY	9128284T4	50,000,000	2.63	1.65	0.00	0.00	656,250
Interest	12/15/19	6/15/21	U.S. Treasuries	US TREASURY	9128284T4	50,000,000	2.63	1.69	0.00	0.00	656,250
Interest	12/15/19	12/15/21	Federal Agencies	FEDERAL HOME LOAN BANK	3130ACB60	50,000,000	2.00	2.00	0.00	0.00	500,000
Interest	12/15/19	6/15/22	Federal Agencies	FREDDIE MAC	3134GBF72	50,000,000	2.01	2.01	0.00	0.00	251,250
Interest	12/17/19	12/17/21	Federal Agencies	FEDERAL FARM CREDIT BANK	3133EJ3B3	25,000,000	2.80	2.84	0.00	0.00	350,000
Interest	12/17/19	12/17/21	Federal Agencies	FEDERAL FARM CREDIT BANK	3133EJ3B3	25,000,000	2.80	2.84	0.00	0.00	350,000
Interest	12/17/19	12/17/21	Federal Agencies	FEDERAL FARM CREDIT BANK	3133EJ3B3	25,000,000	2.80	2.85	0.00	0.00	350,000
Interest	12/19/19	9/19/22	Federal Agencies	FEDERAL HOME LOAN BANK	3130AH4A8	100,000,000	2.25	2.25	0.00	0.00	562,500
Interest	12/20/19	10/20/20	Federal Agencies	FEDERAL FARM CREDIT BANK	3133EKR57	112,500,000	1.76	1.81	0.00	0.00	165,340
Interest	12/21/19	12/21/20	Federal Agencies	FEDERAL FARM CREDIT BANK	3133EGX75	50,000,000	1.91	1.91	0.00	0.00	79,651
Interest	12/22/19	6/22/20	Federal Agencies	FREDDIE MAC	3134GBST0	14,675,000	1.65	1.65	0.00	0.00	121,069
Interest	12/22/19	6/22/21	Federal Agencies	FANNIE MAE	3135G0U35	25,000,000	2.75	2.76	0.00	0.00	343,750
Interest	12/24/19	9/24/20	Negotiable CDs	TORONTO DOMINION BANK NY	89114N5H4	100,000,000	2.01	2.01	0.00	0.00	161,756
Interest	12/24/19	12/24/20	Federal Agencies	FEDERAL FARM CREDIT BANK	3133EFTX5	100,000,000	2.04	2.04	0.00	0.00	169,833
Interest	12/25/19	3/25/21	Federal Agencies	FEDERAL FARM CREDIT BANK	3133EKR99	90,000,000	1.82	1.83	0.00	0.00	136,350
Interest	12/27/19	9/28/20	Negotiable CDs	TORONTO DOMINION BANK NY	89114N5M3	50,000,000	2.03	2.03	0.00	0.00	84,563
Interest	12/27/19	10/26/20	Negotiable CDs	BANK OF MONTREAL CHICAGO	06370R6W4	50,000,000	2.05	2.05	0.00	0.00	125,106
Interest	12/29/19	6/29/20	Federal Agencies	FREDDIE MAC	3134GBTX0	50,000,000	1.75	1.76	0.00	0.00	437,500
Interest	12/29/19	6/29/21	Federal Agencies	FREDDIE MAC	3134GBJ60	50,000,000	1.90	1.90	0.00	0.00	475,000
Interest	12/30/19	6/30/20	Federal Agencies	FANNIE MAE	3136G3TG0	-	1.75	1.75	0.00	0.00	131,250
Interest	12/30/19	9/28/20	Negotiable CDs	BANK OF NOVA SCOTIA HOUS	06417MCW3	50,000,000	2.02	2.02	0.00	0.00	87,021
Interest	12/30/19	10/28/20	Negotiable CDs	WESTPAC BANKING CORP NY	96130ADY1	50,000,000	1.97	1.97	0.00	0.00	84,868
Interest	12/31/19	1/1/20	Money Market Funds	DREYFUS GOVERN CASH MGMT	262006208	10,536,800	1.52	1.52	0.00	0.00	13,568
Interest	12/31/19	1/1/20	Money Market Funds	FEDERATED GOVERNMENT OBL	608919718	131,956,887	1.54	1.53	0.00	0.00	187,896
Interest	12/31/19	1/1/20	Money Market Funds	BLACKROCK LIQ INST GOV F	09248U718	10,506,961	1.51	1.51	0.00	0.00	13,422
Interest	12/31/19	1/1/20	Money Market Funds	FIDELITY INST GOV FUND	31607A703	530,395,803	1.55	1.55	0.00	0.00	915,434
Interest	12/31/19	1/1/20	Money Market Funds	MORGAN STANLEY INST GOVT	61747C707	11,344,859	1.52	1.52	0.00	0.00	14,646
Interest	12/31/19	6/30/20	U.S. Treasuries	US TREASURY	912828XY1	50,000,000	2.50	2.38	0.00	0.00	625,000
Interest	12/31/19	12/31/20	U.S. Treasuries	US TREASURY	912828N48	50,000,000	1.75	1.64	0.00	0.00	437,500
Interest	12/31/19	6/30/21	U.S. Treasuries	US TREASURY	9128287A2	50,000,000	1.63	1.71	0.00	0.00	406,250
Interest	12/31/19	6/30/21	U.S. Treasuries	US TREASURY	9128287A2	50,000,000	1.63	1.67	0.00	0.00	406,250
Interest	12/31/19	6/30/21	U.S. Treasuries	US TREASURY	9128287A2	50,000,000	1.63	1.65	0.00	0.00	406,250
Interest	12/31/19	6/30/21	U.S. Treasuries	US TREASURY	912828S27	25,000,000	1.13	1.64	0.00	0.00	140,625
Interest	12/31/19	12/31/21	U.S. Treasuries	US TREASURY	912828U81	50,000,000	2.00	1.61	0.00	0.00	500,000
Interest	12/31/19	6/30/22	U.S. Treasuries	US TREASURY	912828XW5	25,000,000	1.75	1.77	0.00	0.00	218,750
<b>Subtotals</b>						<b>\$3,022,059,849</b>	<b>1.87</b>	<b>1.87</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ 16,420,762</b>

## Investment Transactions Pooled Fund

Transaction	Settle Date	Maturity	Type of Investment	Issuer Name	CUSIP	Par Value	Coupon	YTM	Price	Interest	Transaction
Grand Totals		57	Purchases								
		(12)	Sales								
		(26)	Maturities / Calls								
		19	Change in number of positions								

**From:** [Board of Supervisors. \(BOS\)](#)  
**To:** [BOS-Supervisors](#)  
**Subject:** FW: Issued: Evaluation of the Stay Over Program at Buena Vista Horace Mann School  
**Date:** Monday, January 13, 2020 9:34:00 AM

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**From:** Reports, Controller (CON) <controller.reports@sfgov.org>  
**Sent:** Monday, January 13, 2020 9:22 AM  
**To:** Reports, Controller (CON) <controller.reports@sfgov.org>  
**Subject:** Issued: Evaluation of the Stay Over Program at Buena Vista Horace Mann School

In November 2018, the San Francisco Department of Homelessness and Supportive Housing (HSH) and school leadership from Buena Vista Horace Mann K-8 Community School (BVHM) with support from Supervisor Hillary Ronen launched the Stay Over Program – a collaborative and innovative pilot program that involved converting one of the gyms at BVHM into an overnight family shelter for families experiencing homelessness and housing insecurity whose children attend school within SF Unified School District.

City Performance – a division of the Controller’s Office – was asked to evaluate the program to help inform HSH and City leadership on how the program is working and offer recommendations for monitoring and improving its services. The results through September 2019 show that the program served 59 families (193 individuals), with shelter occupancy significantly increasing after SOP opened up to families with children attending any SFUSD school in April 2019, and successfully connected nearly all of them to the City’s Coordinated Entry system, the community link for connecting households experiencing homelessness to San Francisco’s system of care and available resources.

In a relatively short time, the Stay Over Program provided a culturally responsive service that directly met the needs of Spanish-speaking families that were experiencing homelessness or housing instability for the first time. City Performance recommends maintaining the program’s current capacity and design given existing utilization levels and further evaluation to understand the program’s longer-term effectiveness in connecting families to more stable housing options.

To view the full report, please visit our website at:  
<http://openbook.sfgov.org/webreports/details3.aspx?id=2791>  
To view the accompanying appendices, please visit our website at:  
<http://openbook.sfgov.org/webreports/details3.aspx?id=2790>

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For all **press inquiries**, please email [CON.media@sfgov.org](mailto:CON.media@sfgov.org).  
For questions about the **evaluation**, please contact Wendy Lee at [wendy.lee2@sfgov.org](mailto:wendy.lee2@sfgov.org).

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# Evaluation of the Stay Over Program at Buena Vista Horace Mann School

January 2020



**CITY & COUNTY OF SAN FRANCISCO**

Office of the Controller  
City Performance Unit

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# About City Performance

The City Services Auditor (CSA) was created in the Office of the Controller through an amendment to the San Francisco City Charter that was approved by voters in November 2003. Within CSA, City Performance ensures the City's financial integrity and promotes efficient, effective, and accountable government.

City Performance Goals:

- City departments make transparent, data-driven decisions in policy development and operational management.
- City departments align programming with resources for greater efficiency and impact.
- City departments have the tools they need to innovate, test, and learn.

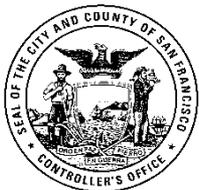
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For all **press inquiries**, please email [CON.media@sfgov.org](mailto:CON.media@sfgov.org)

For questions about the **evaluation**, please contact Wendy Lee at [wendy.lee2@sfgov.org](mailto:wendy.lee2@sfgov.org)

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# EXECUTIVE SUMMARY

## Introduction

In 2017, San Francisco Unified School District (SFUSD) identified 64 families whose children are students at Buena Vista Horace Mann K-8 Community School (BVHM) and lacked safe and stable housing. School leadership and the Department of Homelessness and Supportive Housing (HSH) developed the Stay Over Program (SOP) with strong support from Supervisor Hillary Ronen in which one of BVHM's gyms was converted to an overnight family shelter to provide a safe place for these families experiencing homelessness or housing insecurity to sleep at night. Through SOP, families are also connected to HSH's Coordinated Entry Access Points to help them secure more stable housing. SOP launched in November 2018 to BVHM families and within five months opened to the entire school district due to available capacity and greater district-wide need. Using a school gym to temporarily house families experiencing homelessness or housing insecurity who have children attending that school or another school in the district is a new model for San Francisco and the country and an innovative strategy to support HSH's goal to end family homelessness by December 2022 and continuing to ensure no families with children are unsheltered.

The City Performance Unit of the Controller's Office evaluated SOP to understand how SOP works, who it serves, and how well it helps SFUSD families experiencing homelessness or housing insecurity obtain more stable housing situations, focusing on the 59 families who were served between November 2018 through September 2019. This report summarizes the results of City Performance's evaluation and offers recommendations for monitoring and improving SOP moving forward.

## Stay Over Program Overview



**WHO:** Families experiencing homelessness or housing insecurity with at least one child enrolled at SFUSD

**WHAT:** (1) Emergency overnight place to stay and/or  
(2) Supportive services

**WHEN:** Seven days a week  
School days (7 pm-7 am)  
Weekends/breaks (5 pm-10 am)

**WHERE:** Gym at Buena Vista Horace Mann K-8 School

**HOW:** Families connect through SFUSD staff, Dolores Street directly, or Access Points

### KEY PROGRAM DATES

**Nov 15, 2018** SOP launched

**Jan 15, 2019** SOP fully operational

**Mar 12, 2019** SFUSD Board approved opening SOP to all SFUSD schools

**Apr 2, 2019** First wave of students referred from other SFUSD schools

## EXECUTIVE SUMMARY

### Evaluation Overview

This evaluation was designed with input from our Advisory Group, which included representatives from SFUSD, BVHM, HSH, Supervisor Ronen's office, and the SOP shelter provider. We worked closely with our partners at HSH and SFUSD to obtain the data to answer the evaluation questions below.

#### EVALUATION QUESTIONS

- 1 Who are the SFUSD families who were served through SOP and what were their experiences?
- 2 What are the service connection and housing outcomes for families staying at SOP?
- 3 How does SOP compare to traditional congregate shelters to support families experiencing homelessness or housing insecurity in San Francisco?
- 4 What are the experiences and perceptions of key stakeholders?

### Key Findings

**SOP served 59 SFUSD families in its first 11 months**, or 193 individuals. Most families stayed overnight.

**After SOP opened to all SFUSD students in April 2019, overnight occupancy increased significantly**, reaching a monthly average occupancy of 65%, up from an average 5% before April.

**Nearly all SOP families were assessed at an Access Point**, where families can access the system of care and available resources.

**Nearly two-thirds of SOP families have exited from the program to their next placement on the path to secure housing.** Six families are renting their own place.

## EXECUTIVE SUMMARY

### Conclusions

- 1 In a relatively short time as a pilot program, SOP has provided a culturally responsive service that directly meets the needs of SFUSD Spanish-speaking families experiencing homelessness or housing instability for the first time.
- 2 SOP provides a focused service in the spectrum of HSH services with unique features not present in other shelters.
- 3 Stakeholders used occupancy data to inform the program change to open SOP to all SFUSD schools, which significantly increased program utilization and cost effectiveness.
- 4 Most families and key stakeholders have had positive experiences with SOP.

### Recommendations

- 1 Maintain the current capacity and design of SOP given existing utilization levels.
- 2 Continue evaluation of process and outcome measures to understand SOP's longer-term effectiveness in connecting families experiencing homelessness or housing insecurity to more stable housing options.
- 3 Further assess service gaps for people experiencing homelessness who are Hispanic/Latinx.
- 4 Explore training and training reinforcement opportunities for SOP staff and key partners.
- 5 Enhance and explore incentivizing data collection, monitoring, and reporting processes to support decision-making around key programmatic and policy issues.
- 6 Review whether SOP staffing levels are adequate to deliver high levels of service to families, ensure consistent use of systems and processes, and provide necessary oversight.
- 7 Assess current family shelter policies to ensure alignment with SOP goals.

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## ACRONYMS AND ABBREVIATIONS

BVHM	Buena Vista Horace Mann K-8 Community School
CSA	City Services Auditor, a division within the Controller's Office
Dolores Street	Dolores Street Community Services, the nonprofit operator of the Stay Over Program
FF	Providence First Friendship, the San Francisco Department of Homelessness and Supportive Housing's lowest-barrier congregate shelter available for families
HRS	Homelessness Response System, describes the overall system of services to address homelessness managed by the San Francisco Department of Homelessness and Supportive Housing
HSH	San Francisco Department of Homelessness and Supportive Housing
LOS	Length of stay
ONE System	Online Navigation and Entry System, the data system used for all housing and services for people experiencing homelessness in San Francisco
SFUSD	San Francisco Unified School District
SOP	Stay Over Program

## **Section 1.**

# **What is the Stay Over Program (SOP)?**

### **Overview of the section**

- Background and goals
- Program timeline
- Program workflow

# OVERVIEW OF THE STAY OVER PROGRAM

## Background and project goals

In 2017, San Francisco Unified School District (SFUSD) identified 64 families whose children attended Buena Vista Horace Mann K-8 Community School (BVHM) and lacked safe or stable housing. School leadership and the Department of Homelessness and Supportive Housing (HSH) with strong support from Supervisor Hillary Ronen developed the Stay Over Program (SOP), in which one of BVHM’s gyms was converted to an overnight family shelter to provide a safe place for these families experiencing homelessness or housing insecurity to sleep at night. Through SOP, families are and get connected to Coordinated Entry Access Points to help them secure a more stable housing situation.<sup>1</sup> The pilot program was initially launched to families with students attending BVHM on November 15, 2018, and expanded to the entire school district on April 2, 2019 given lower than anticipated need for temporary shelter at BVHM and greater need district-wide.<sup>2</sup>

While cities frequently use community spaces as part-time shelters for individuals and families experiencing homelessness (e.g., church community rooms), using a school gym to temporarily house families with children attending that school or another school in the district is a new model for San Francisco and the country. HSH and Supervisor Ronen requested the City Performance Unit of the Controller’s Office evaluate SOP to provide information on how SOP is working and recommendations for monitoring and improving its services.

**This report provides HSH and City leadership with information on how the SOP is working and recommendations for monitoring and improving its services in the future.**

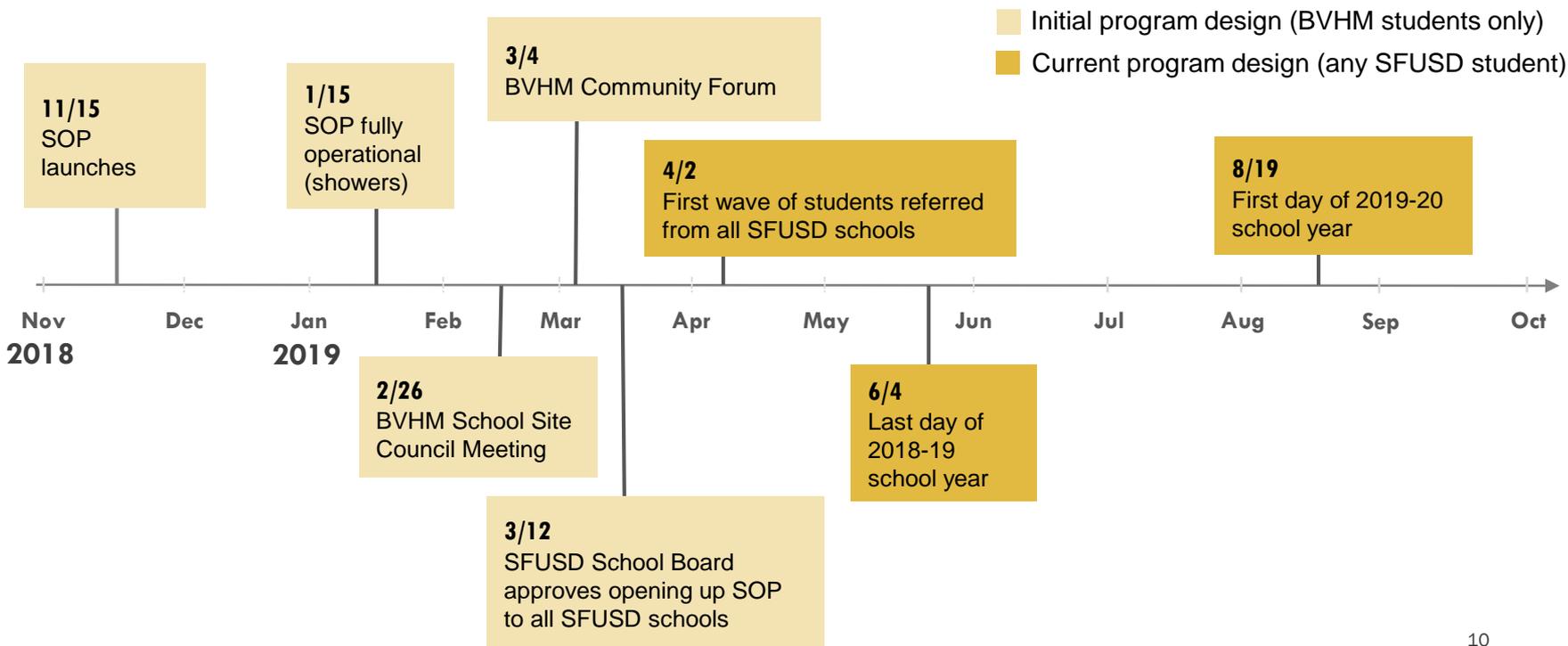
<sup>1</sup> Coordinated Entry attempts to problem-solve with homeless households to support them to end their experience of homelessness in ways realistically aligned to the available resources in San Francisco’s Homelessness Response System. Access Points are localized points of community entry operated by non-profit service providers, where staff assess households for service needs and eligibility and perform problem solving and referrals to appropriate and available resources for rapidly connecting people to a housing solution.

<sup>2</sup> SFUSD reported that there were 1,806 students experiencing homelessness or marginally housed in San Francisco’s public schools during 2018. <http://hsh.sfgov.org/wp-content/uploads/FINAL-PIT-Report-2019-San-Francisco.pdf>

# OVERVIEW OF THE STAY OVER PROGRAM

SOP initially launched in mid-November 2018 for BVHM students and their families and opened up referrals to all SFUSD schools in April 2019, representing a major turning point for the program.

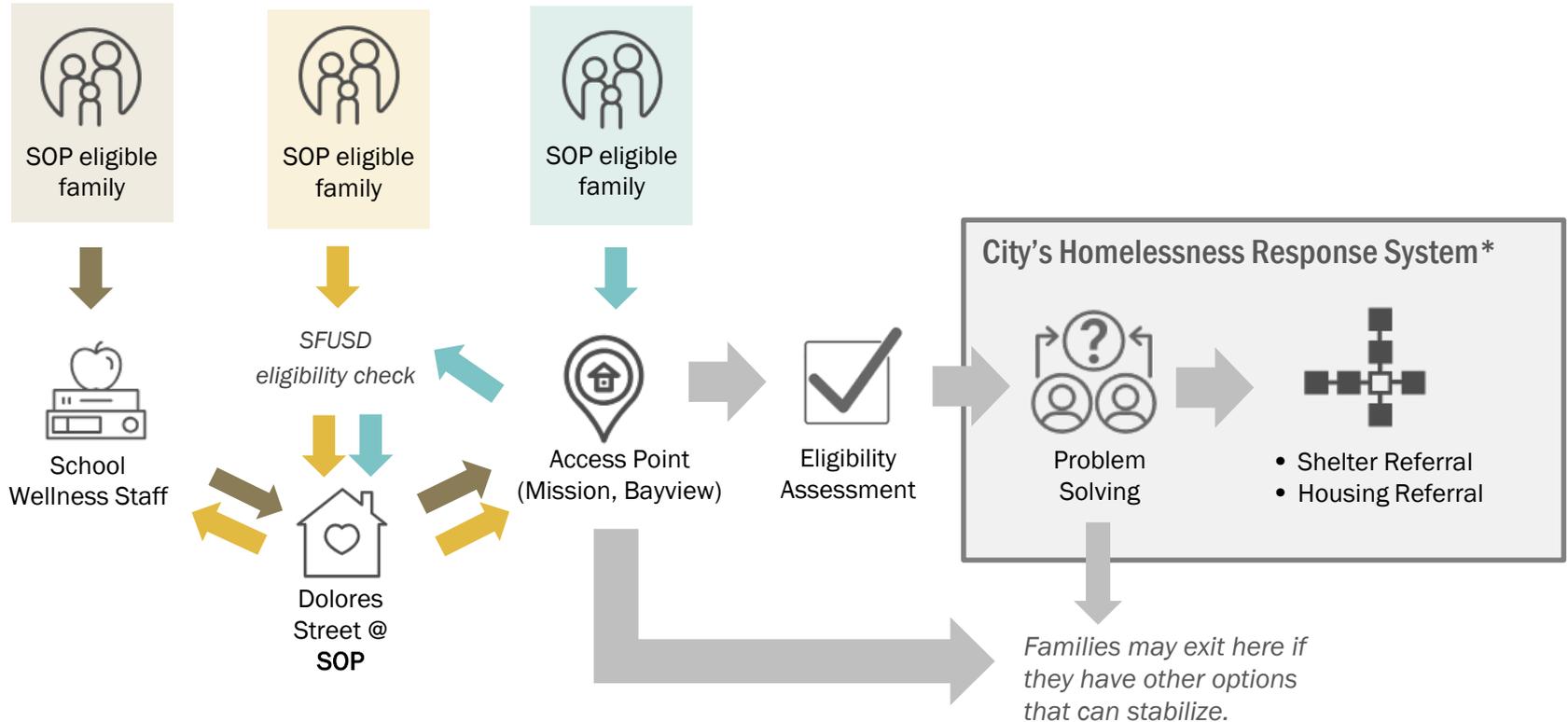
Throughout SOP’s pilot year, stakeholders reviewed utilization data to inform program design and ensure accountability. Mayor Breed, Supervisor Ronen, SFUSD, HSH, and Dolores Street teams recognized SOP had capacity to serve more families beyond BVHM alone. In February 2019, Mayor Breed sent a letter to SFUSD’s Board of Education urging the school board to approve the expansion of SOP. In March 2019, the SFUSD Board approved the change to expand SOP to all SFUSD families, which started in April. Opening SOP to all SFUSD students represented a key milestone and important turning point.



# OVERVIEW OF THE STAY OVER PROGRAM

Since November 2018, SOP's program workflow has evolved to meet the needs of SFUSD families and provide multiple ways for an eligible family to connect to SOP and other services.

Each colored arrow represents one of three different pathways through which a SOP eligible family can connect to SOP to stay overnight and access the City's supportive services. In addition to providing multiple pathways into SOP, the current program workflow also enables key communication streams between stakeholders to collaborate and support families.



\* The Homelessness Response System describes the overall system of services to address homelessness managed by HSH.

## **Section 2.**

**How did we evaluate SOP in its pilot year?**

### **Overview of the section**

- Evaluation approach
- Stakeholders involved
- Data sources and limitations

# HOW DID WE EVALUATE SOP IN ITS PILOT YEAR?

## Evaluation approach

To provide the data needed to make informed decisions, City Performance aimed to document how SOP works and how well it helps families with SFUSD students who are experiencing homelessness or housing insecurity obtain a more stable housing situation through emergency shelter services in a school setting and referrals to other resources such as Access Points, case management, crisis intervention, and other support services.

**EVALUATION QUESTIONS**

- 1 Who are the SFUSD families who were served through SOP and what were their experiences?
- 2 What are the service connection and housing outcomes for families staying at SOP?
- 3 How does SOP compare to traditional congregate shelters to support families experiencing homelessness or housing insecurity in San Francisco?
- 4 What are the experiences and perceptions of key stakeholders?

## HOW DID WE EVALUATE SOP IN ITS PILOT YEAR?

### Stakeholders involved

HSH created a collaborative team of City and nonprofit agencies to guide program development and support operations. City Performance engaged these agencies to help validate evaluation tools, assist information gathering via interviews and data collection, provide ongoing feedback to inform the evaluation approach, and review and interpret findings.

These stakeholders included:

- HSH leadership, shelter program and contract management, and data and performance staff
- Supervisor Hillary Ronen’s Office
- BVHM leadership and wellness staff
- SFUSD special projects, counseling, wellness, and data and performance staff
- Dolores Street Community Services (Dolores Street), the nonprofit operator of SOP
- Catholic Charities and Compass Family Services, the nonprofit operators of Access Points



# HOW DID WE EVALUATE SOP IN ITS PILOT YEAR?

## Evaluation data sources

City Performance carried out a systematic mixed-methods approach by collecting and analyzing data from eight difference sources detailed below from November 2018 through September 2019. Detailed methodology, assumptions, and limitations are provided in Appendix A.

Quantitative

**ONE System client records from 11/15/18 through 9/30/19**  
(n = 59 families, 193 individuals)

**SFUSD student attendance records for school years 2017-18 and 2018-19**  
(n = 31 students)

**Surveys of families who stayed at SOP**  
(n = 38 1<sup>st</sup> survey, n = 19 2<sup>nd</sup> survey)

**Surveys of SFUSD wellness staff who participated in SOP**  
(n = 8)

**HSH program contracts for SOP and First Friendship**  
(n = 2)

Qualitative

**Key informant interviews with families who stayed at SOP**  
(n = 4)

**Key informant interviews with nonprofit shelter provider, Dolores Street**  
(n = 3)

**Key informant interviews with staff from Access Points**  
(n = 1)

**Meetings with HSH program, contract, and data and reporting staff**  
(n = 8)

**Meetings with the Advisory Group**  
(n = 4)

## **Section 3.**

# **Who are the SFUSD families who were served through SOP?**

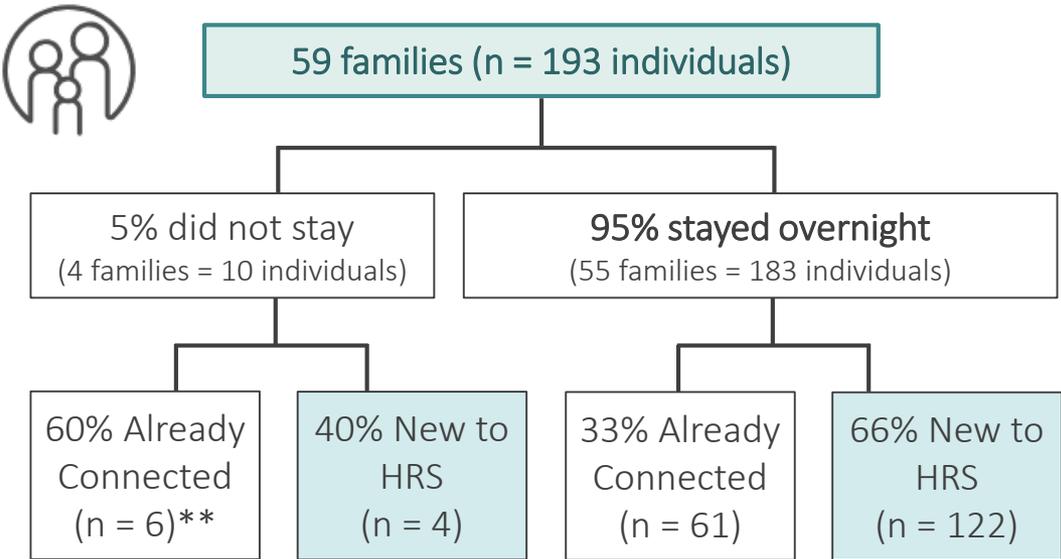
### **Overview of the section**

- Number of families
- Duration and recurrence of homelessness
- Demographics
- Experiences of families staying at SOP

Section 3 **WHO ARE THE SFUSD FAMILIES WHO WERE SERVED THROUGH SOP?**

Between November 2018 and September 2019, there were 59 families connected to services through SOP.

During the evaluation time period, a total of 193 individuals (across 59 families) were connected to services through SOP. This count includes both individuals who stayed overnight at the BVHM school gym, as well as individuals who were connected to the City’s Homelessness Response System (HRS)\* through SOP’s collaborative case management process but did *not* stay overnight. A higher percentage of individuals staying overnight were new to the HRS (66%), as compared to individuals who engaged with services but did not stay overnight (40%).



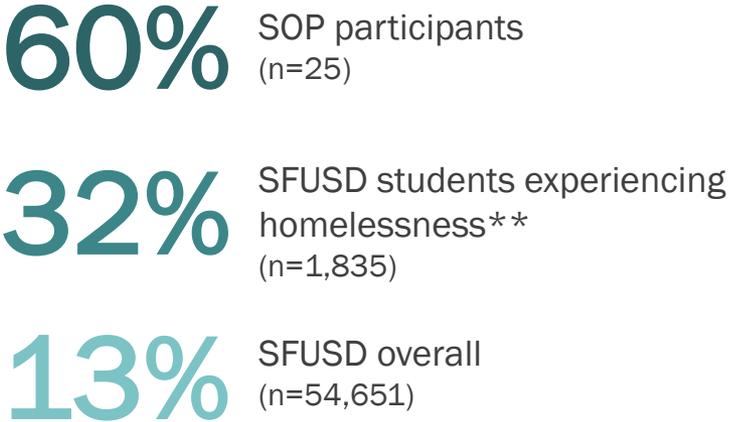
**Most individuals connected through SOP were *not* previously connected to the City’s Homelessness Response System.**

Source: HSH ONE System Data (from 11/15/2018 - 9/30/2019).  
 \* The Homelessness Response System (HRS) describes the overall system of services to address homelessness managed by HSH. City Performance identified individuals who were connected to the system as those who had a profile in the Online Navigation and Entry (ONE) System as of 10/17/2019, the data system used for all housing and services for people experiencing homelessness in San Francisco.  
 \*\* Data on previous connections to HRS are presented at the individual level (not at family-level) because individuals within the same family may have different connection histories.

Section 3 **WHO ARE THE SFUSD FAMILIES WHO WERE SERVED THROUGH SOP?**

SOP has served students who experienced much higher rates of chronic absenteeism prior to entering the program compared to other SFUSD students.

As reported in a 2016 SFUSD-Hamilton Family Center partnership report,\* family homelessness and the associated stress and trauma can negatively affect attendance and academic outcomes. Students who miss ten percent or more school days each school year are considered chronically absent. A snapshot of student attendance data from the 2017-18 school year (prior to SOP launch) shows that SOP has served a population of students that experienced higher levels of chronic absenteeism (60%) compared to SFUSD students experiencing homelessness overall (32%) and SFUSD students overall (13%). We do not have data to characterize any impacts of SOP on attendance; any possible effects of SOP on student outcomes warrant continued evaluation.



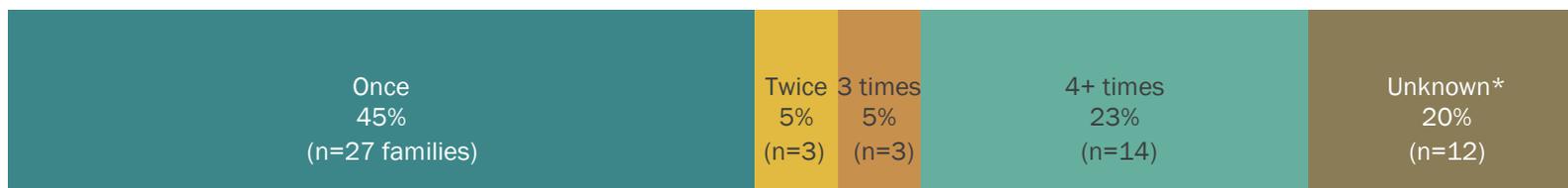
**Since opening up to all SFUSD schools in April 2019, more than 30 schools referred their students to SOP. These schools represent all grade levels, from early education through high school, and include SFUSD’s special service centers.**

Source: Summary 2017-18 attendance data from SFUSD Research, Planning, and Assessment Unit (10/2/19 report). The total number of SOP students with attendance data is less than the total number of students participating in SOP because of missing data for unmatched students and for students who stayed only during summer.  
\* SFUSD/Hamilton Family Center report, Partnering with Public Schools to End Family Homelessness in San Francisco (February 2016).  
\*\* These students are defined as those known to SFUSD’s Students & Families Experiencing Homelessness (SAFEH) program. This is likely an undercount because there may be SFUSD students experiencing homelessness whose housing insecurity is not currently known to the school district.

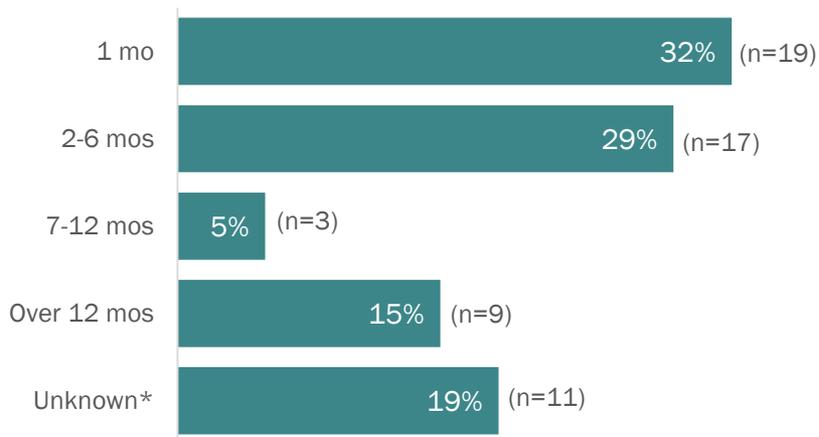
Section 3 **WHO ARE THE SFUSD FAMILIES WHO WERE SERVED THROUGH SOP?**

Almost half of SOP families were experiencing homelessness for the first time in the past three years, and one-third connected to the City’s system of services within the first month of becoming homeless.

Number of times that family has experienced homelessness in the past 3 years



Length of homelessness in the past 3 years



**Although nearly half of the 59 families connected through SOP reported experiencing homelessness in San Francisco, 42% of families reported experiencing homelessness outside of San Francisco. \*\***

Source: HSH ONE System Data (from 11/15/2018 - 9/30/2019).

\* Client data may be missing in cases where client doesn't know, refused to answer, or data was not collected during program enrollment.

\*\* Possible explanations for why families may be experiencing homelessness outside of San Francisco include the following: some HSH resources place families outside of San Francisco or families may be living doubled-up with friends or family outside of SF. Families are required to confirm residency for SFUSD eligibility every six years; thus, families may remain within the school district to maintain stability for students despite no longer living within SF county.

**Section 3 WHO ARE THE SFUSD FAMILIES WHO WERE SERVED THROUGH SOP?**

Most families connected through SOP identified as Hispanic/Latinx and speak Spanish as their primary language.

Because each family may have members who identify as different races/ethnicities, we looked at demographics at the individual level. Preferred language is only known for approximately half of clients because structured data collection of language in the ONE System did not begin until after the pilot program launched.

<b>Race/Ethnicity*</b>	<b>% of clients (n=193)</b>
Hispanic/Latinx	74%
Black/African American	12%
Native Hawaiian/Other Pacific Islander	5%
White	4%
Multi-racial	2%
Asian	2%
Data not collected	1%
<b>Language</b>	<b>% of clients (n=193)</b>
Spanish	32%
English	20%
Other**	1%
Not reported**	47%

Source: HSH ONE System Data (from 11/15/2018 - 9/30/2019).

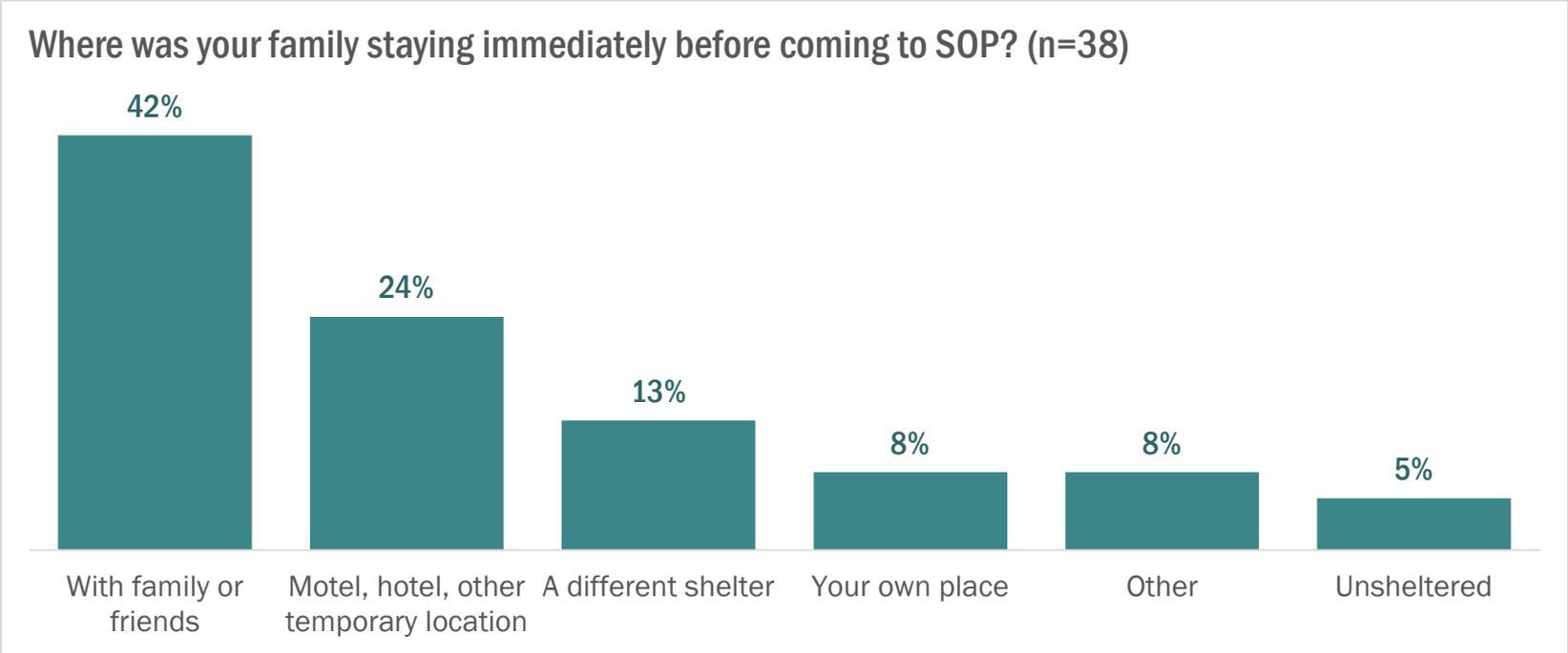
\* Race/ethnicity categorized based on the US Census Bureau definition where Hispanic/Latinx are identified by ethnicity, regardless of their race.

\*\* Language is self-reported and is not currently collected on the Housing Prioritization or the Program Enrollment form. Due to low sample size, we aggregated other languages.

Section 3 **WHO ARE THE SFUSD FAMILIES WHO WERE SERVED THROUGH SOP?**

More than 40 percent of SOP families surveyed were staying most recently with family or friends.

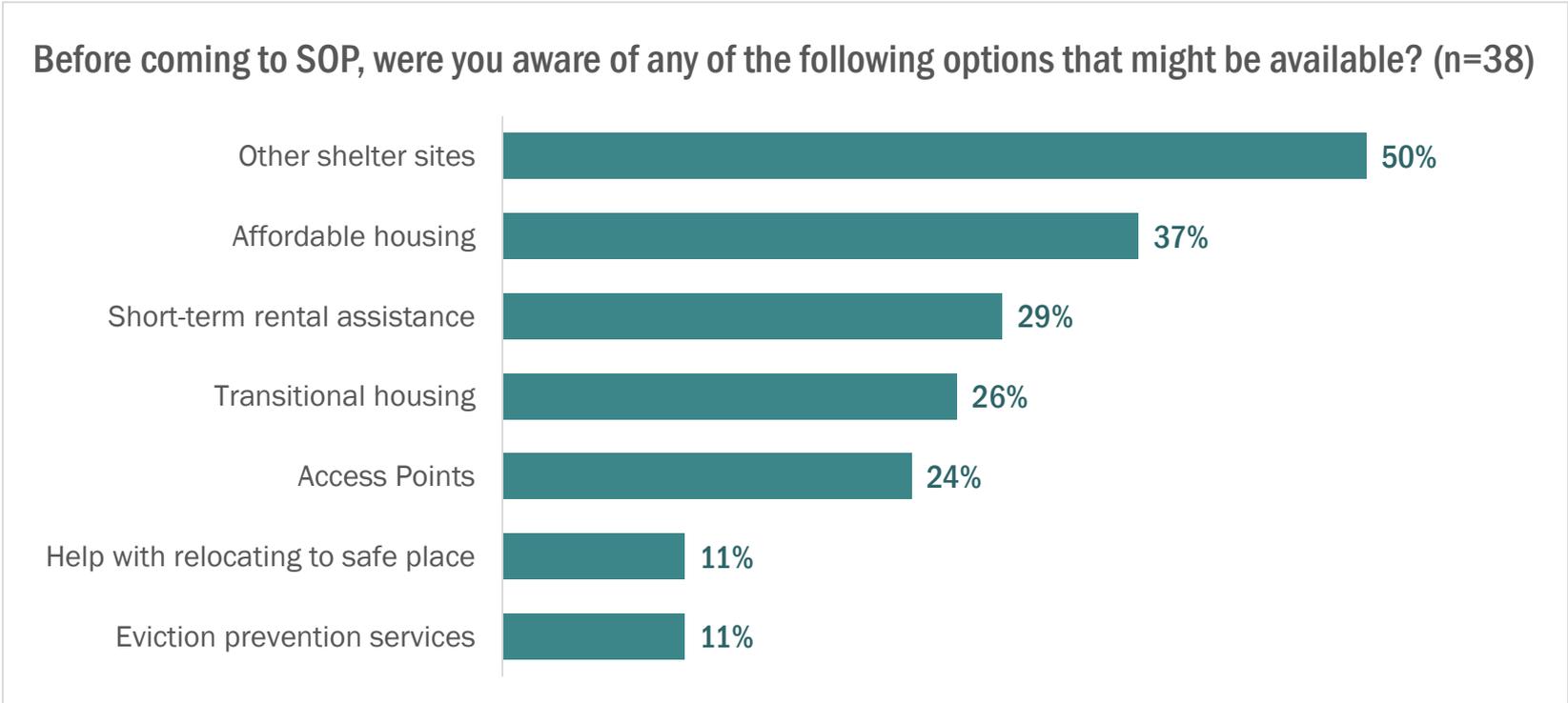
SOP families were invited to participate in an optional, anonymous survey within the first two weeks of staying overnight at SOP. The survey asked about the families’ experiences, where they were staying prior to SOP, and their awareness of other supportive housing services. Nearly three-quarters of families participated in this initial survey (see Appendix B for the family survey instrument). Out of the 38 SOP families who participated in the survey, families reported primarily staying with family or friends (42%), in a motel, hotel, or other temporary locations (24%), or in a different shelter (13%) immediately before coming to SOP.



Section 3 **WHO ARE THE SFUSD FAMILIES WHO WERE SERVED THROUGH SOP?**

Before coming to SOP, half of the families surveyed had heard about other shelter sites as an option.

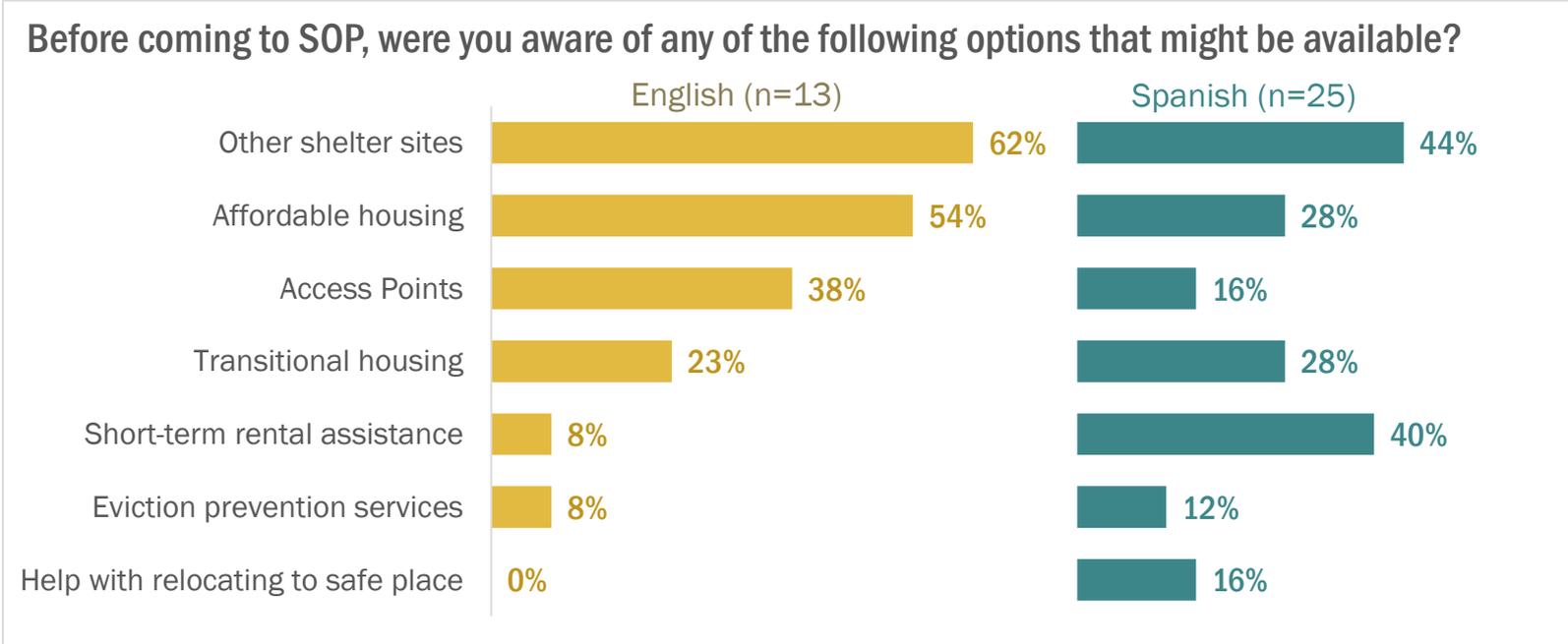
On the first survey (n=38), families were asked whether they were aware of various shelter, problem-solving, and housing options before coming to SOP. Overall, families reported being most likely to have heard about other shelter sites (50%), affordable housing (37%), and short-term rental assistance (29%).



Section 3 **WHO ARE THE SFUSD FAMILIES WHO WERE SERVED THROUGH SOP?**

While other shelters were the most commonly known option among families before coming to SOP, English-speaking families were more likely to have heard of Access Points than Spanish-speaking families.

Using the survey language as a proxy for each family’s preferred language, English-speaking families (n=13) were most likely to have heard of other shelter sites (62%), affordable housing (54%), and Access Points (38%). In contrast, Spanish-speaking families (n=25) were most likely to have heard of other shelter sites (44%), short-term rental assistance (40%), or affordable housing and transitional housing (28%). Differential awareness of Access Points as a resource between English and Spanish speakers may be due to the Mission Access Point location not yet becoming available until October 2018, one year after Central City and Bayview locations were first launched in October 2017.

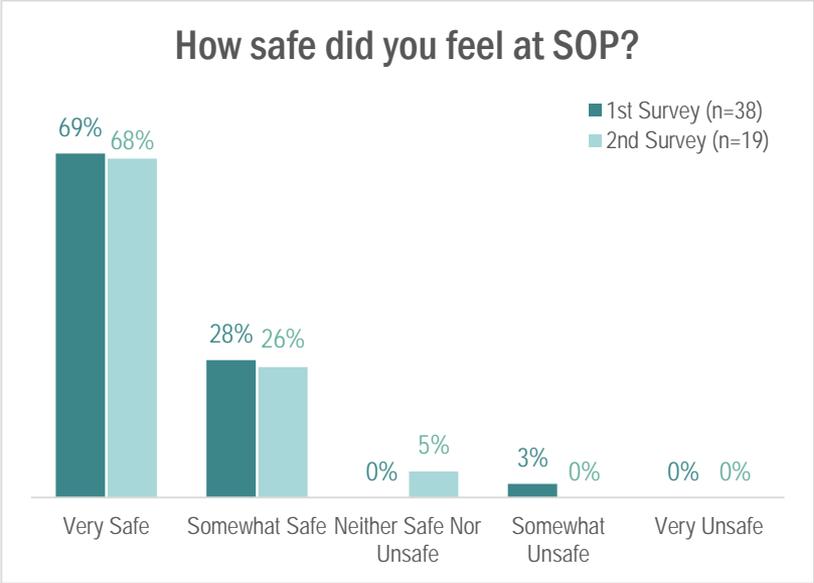
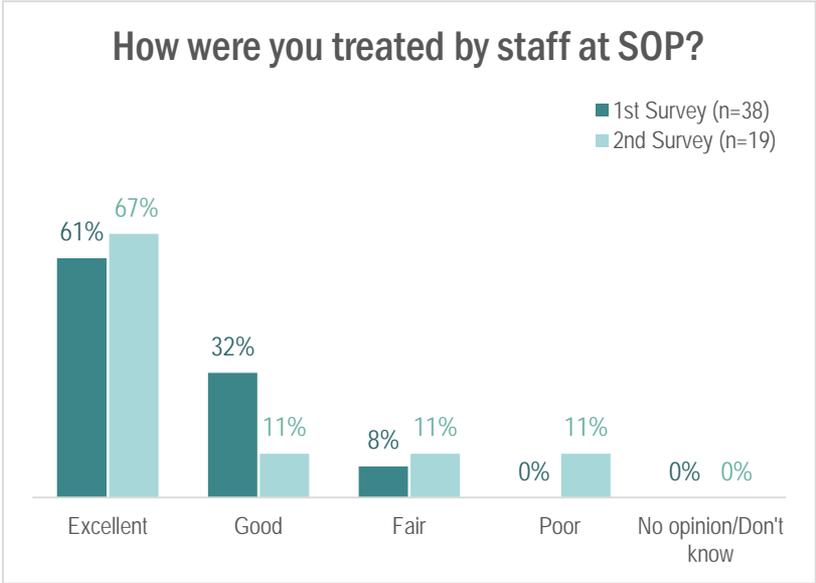


Source: Survey of Stay Over Program families administered February-September 2019.

Section 3 **WHO ARE THE SFUSD FAMILIES WHO WERE SERVED THROUGH SOP?**

## In the survey, most families reported being treated well by staff and feeling safe at SOP.

Consistent with other shelter surveys, respondents were asked how they were treated by staff and how safe they felt at SOP. In general, staff treatment and safety concerns tend to drive the majority of shelter grievances at shelters. More than 90% of survey respondents reported that SOP staff treated them as “Excellent” or “Good” in the first survey (n=38). After families had stayed two weeks or more, families were then invited to participate in a shorter second survey to assess any changes in experience. In the second survey (n=19),\* this percentage decreased to 78% of survey respondents reporting that program staff treated them “Excellent” or “Good”. Nearly 7 out of 10 families responding to the survey reported feeling “Very Safe” at SOP in both the first and second surveys.



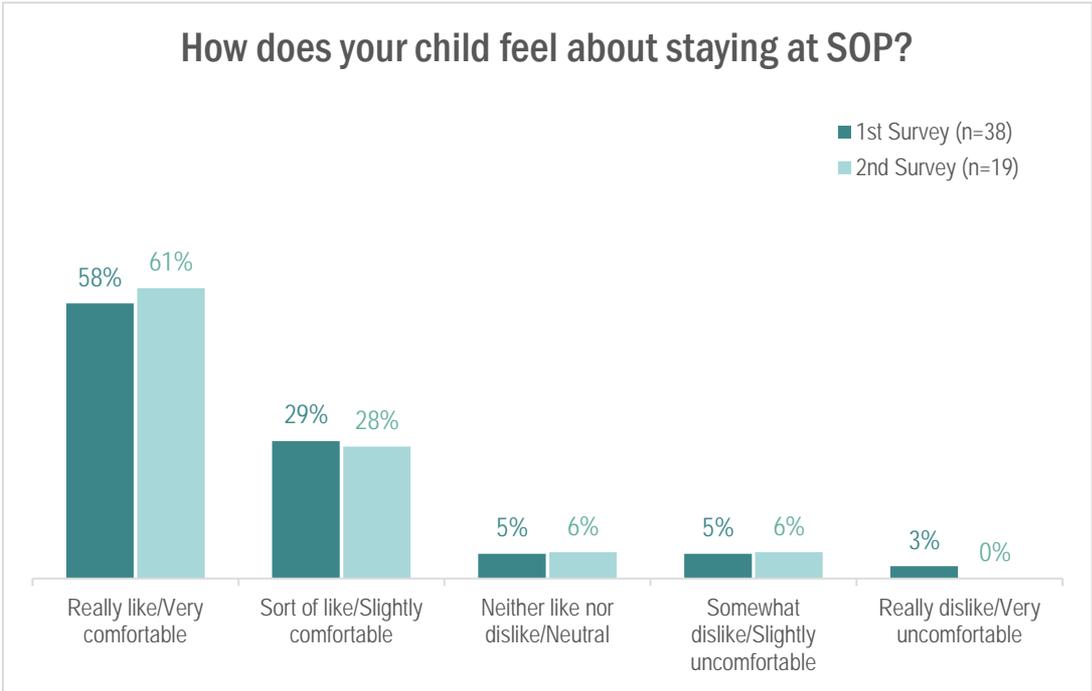
Source: Survey of Stay Over Program families administered February-September 2019.

\* Fewer families completed the second survey than the first survey, which may be attributed to the survey being optional, families exiting from SOP within two weeks, or families staying overnight at SOP at variable/irregular frequencies which made a follow-up survey difficult to administer.

Section 3 **WHO ARE THE SFUSD FAMILIES WHO WERE SERVED THROUGH SOP?**

Nearly all surveyed families reported that their child really liked (or felt very comfortable) staying at SOP.

In both the first and second surveys, nearly 9 out of 10 families responding to the survey reported that their child really liked (or felt very comfortable) or sort of liked (or felt slightly comfortable) staying overnight at SOP.



**For the majority of families surveyed (79%), it was very important to be able to stay somewhere familiar, like their child’s school or another school within SFUSD.**

## Section 3 WHO ARE THE SFUSD FAMILIES WHO WERE SERVED THROUGH SOP?

Interviews with four SOP families who stayed overnight for at least two months revealed key strengths of the program.

**SOP provided a reliable space to sleep and receive a warm meal when families had no other options.**

While the four families were staying in different situations prior to SOP, all reported they decided to stay overnight at SOP because they had no other options. Two families had experience with other City services, while the other two were new to the City's supportive housing services. For all families, SOP provided a space to sleep, showers, and meals. Parents shared that SOP allows their children to get to school on time. Reliably having shelter and meals helped families have one less thing to worry about.

**School-based referrals were key linkages for connecting families to SOP.**

For two families, parents reported learning about the SOP directly from their school social worker. In one of those cases, a teacher knew her student's family was struggling to find a place to stay and connected the family with the school social worker. Another family had heard about SOP through BVHM's "Noticias" parent bulletin. All families connected with their school social worker as part of SOP.

**The Community and Family Engagement Coordinator's warm connection with families has been critical for engagement.**

Families recalled their interaction with Dolores Street's Community and Family Engagement Coordinator as an important bright spot in their experience. Families shared that the Coordinator welcomed and encouraged all families, spent time with all the children, and helped families adapt to SOP. One family that has exited from SOP shared that they are still in contact with the Coordinator.

## Section 3 WHO ARE THE SFUSD FAMILIES WHO WERE SERVED THROUGH SOP?

While all four families were grateful for SOP, families reported some challenges with the space, staff, and navigating the system.

**Current program setup and limitations with the physical space affect families' experiences.**

Families noted specific concerns that impacted their experience, including limited storage space and no secure place for families to park cars. They appreciated having their own personal area, but two families shared that they had to set up their own cots and sleeping spaces on occasion. One family also cited cleanliness (i.e., mice and bathrooms) as issues.

**Some staff may lack sufficient training on engaging with families equitably, which has led to negative interactions.**

Two families shared that negative experiences with select SOP shelter staff impacted their stays at SOP. They reported that certain shelter staff lack professionalism, exhibit favoritism for some families, and enforce shelter rules inconsistently. These families also shared that some staff seem to not know how to successfully and compassionately interact with families.

**The processes within the shelter system and trying to connect to more stable housing is difficult to navigate.**

Families reported that seeking more permanent housing is a “waiting game” and “people get bounced from place to place.” All four families connected with an Access Point and described experiencing significantly different treatment based on the Access Point visited, where some locations were more helpful than others. In addition, one family expressed that the complaint process felt opaque and that nothing seems to have changed even after submitting several complaints.

## **Section 4.**

**What are the service connection and housing outcomes for families staying at SOP?**

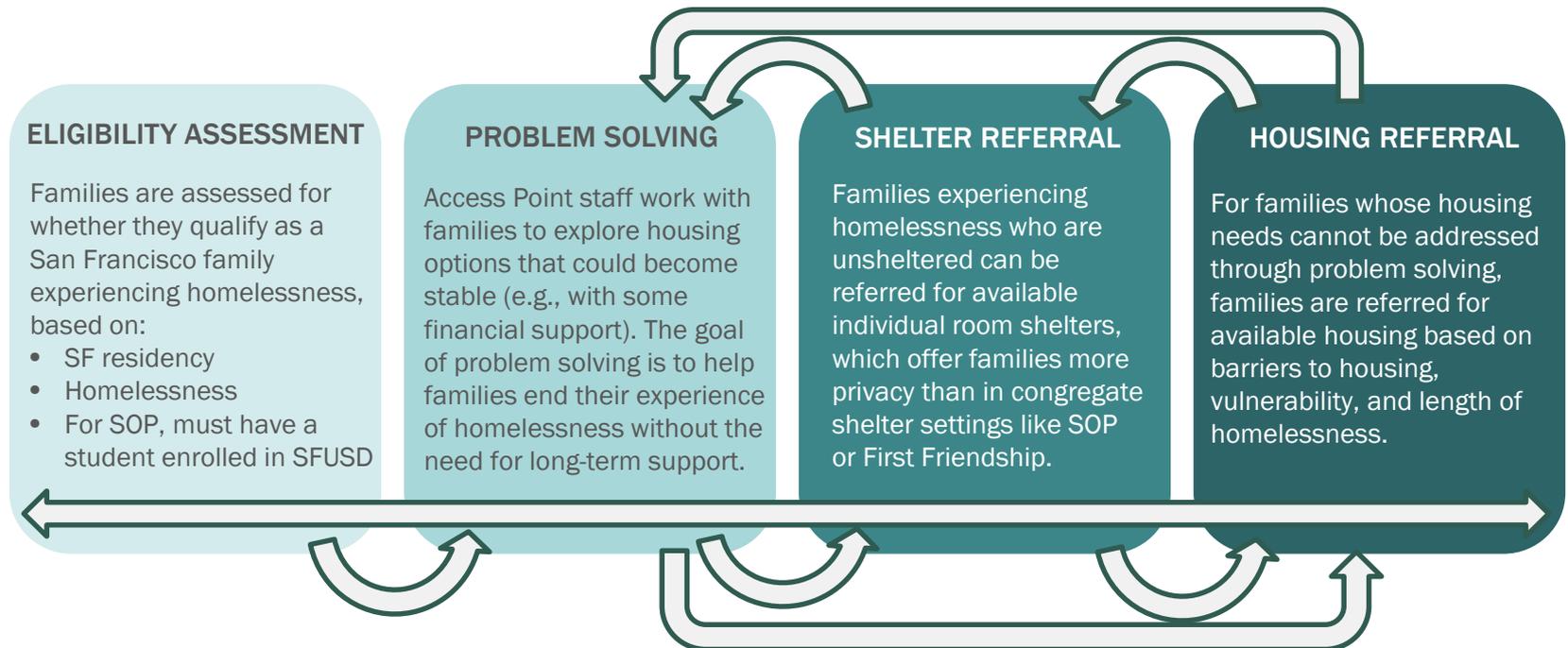
### **Overview of the section**

- Connections to Access Points
- Exits from SOP

## WHAT ARE THE SERVICE AND HOUSING OUTCOMES FOR FAMILIES STAYING AT SOP?

Nearly all SOP families were assessed at an Access Point to determine what resources may be available to each family.

Fifty-six out of 59 families (95%) were assessed at an Access Point since SOP launched in November 2018. Of the 55 SOP families who stayed overnight, 29 of those families (53%) connected to an Access Point for an assessment before or on the first date of their stay at SOP. Access Points are part of HSH’s Family Coordinated Entry system, the community link for families experiencing homelessness to connect with San Francisco’s overall system of supportive housing programs and services. At an Access Point, families are offered a continuum of services (from problem solving to housing referral) and move across different available resources, based on each family’s eligibility and needs.



# WHAT ARE THE SERVICE AND HOUSING OUTCOMES FOR FAMILIES STAYING AT SOP?

Nearly two-thirds of families who have stayed at SOP have exited from the program to their next placement on the path to secure housing.

Thirty-six families (or 122 individuals) out of 55 total families staying overnight have exited from SOP as of September 30, 2019 to their next placement option. As individuals within a household may have different placements, we looked at placements by individual. Of those 122 individuals that have exited, 40% of individuals moved onto other temporary shelter placements, including individual room shelters and transitional housing.

## What was the next placement for SOP individuals who have exited?



**Following their stays at SOP, many families moved onto another temporary shelter placement, which includes individual room shelter and transitional housing with additional supportive services and can be more stable for families than the congregate setting.**

Source: HSH ONE System Data (from 11/15/2018 - 9/30/2019).

\* Other includes exit destinations marked as Other, HOPWA funded project to permanent housing, host home (non-crisis), and staying with family permanently.

## **Section 5.**

**How does SOP compare to traditional congregate shelters to support families experiencing homelessness or housing insecurity in San Francisco?**

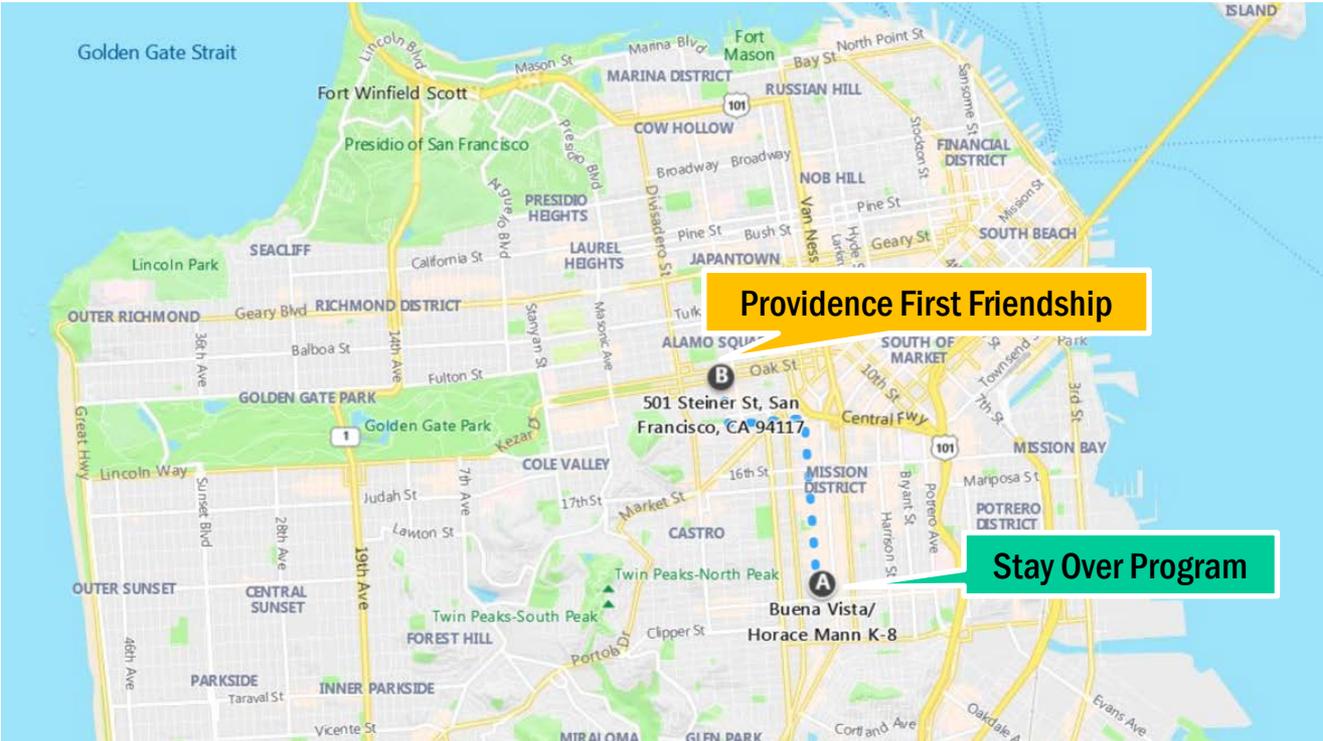
### **Overview of the section**

- SOP on HSH spectrum of family shelters
- Comparing program occupancy and costs

Section 5 **HOW DOES SOP COMPARE TO TRADITIONAL CONGREGATE SHELTERS FOR FAMILIES?**

Compared to other HSH family shelters, SOP is operationally most similar to Providence First Friendship.

Providence First Friendship (FF) is HSH’s lowest-barrier congregate shelter available for families. Unlike some of the other family shelters (like Hamilton), families can stay at FF on a nightly basis without any limits on the number of nights they choose to stay. Although SOP has some different operational features, SOP is also available to families without any limits on number of nights families can stay. FF was therefore selected as the closest available comparison for SOP in this evaluation.



## HOW DOES SOP COMPARE TO TRADITIONAL CONGREGATE SHELTERS FOR FAMILIES?

While both SOP and FF provide low-barrier emergency shelter services, there are some key differences in populations served and operations.

	Stay Over Program (SOP)	First Friendship (FF)
POPULATIONS SERVED	Families experiencing homelessness with at least <b>one student enrolled in SFUSD</b>	Families who are experiencing homelessness
LANGUAGE SERVICES	Yes (Spanish)	No
ELIGIBILITY CRITERIA	Homelessness defined per SFUSD criteria, <b>including</b> families who are doubled-up*	Homelessness definition does <b>not</b> include doubled-up living situations
SPACE	Gym at Buena Vista Horace Mann K-8 School	First Friendship Institutional Baptist Church
CAPACITY	60 individuals in families	50 individuals in families
HOURS	Seven days per week School days: 7pm-7am Weekends/School Breaks: 5pm-10am	Seven days per week Everyday 3pm-7am
REFERRAL	Families <b>cannot</b> self-refer; need to be able to verify SFUSD status	Families <b>can</b> self-refer
RESERVATIONS	Reservations available for multiple days at a time; not time-limited	First-come first-serve on nightly basis; no ongoing reservation; not time-limited
FACILITIES	<ul style="list-style-type: none"> <li>• <b>Three</b> showers on-site</li> <li>• Option to sleep on <b>mats or cots</b></li> <li>• Secure <b>storage area</b></li> </ul>	<ul style="list-style-type: none"> <li>• <b>No</b> showers on-site</li> <li>• Sleep on <b>mats</b></li> </ul>

Source: HSH Contracts, Appendix A documents for Dolores Street-BVHM June 6, 2019 Contract Amendment and Providence-First Friendship March 26, 2019 Contract Amendment.  
 \* Doubled-up includes families who “couch surf”, sleep in garages, or split up their children to stay with friends” per SFUSD’s report, *Partnering with Public Schools to End Family Homelessness in San Francisco* (February 2016). <https://www.issuelab.org/resource/partnering-with-public-schools-to-end-family-homelessness-in-san-francisco.html>

## WHAT ARE THE SERVICE AND HOUSING OUTCOMES FOR FAMILIES STAYING AT SOP?

SOP families stayed a median of 20 days, more than six times longer than families staying at FF.

Both SOP and FF offer families experiencing homelessness a place to stay overnight in congregate setting with no limits on the number of nights they can stay. Families can access FF on a nightly basis, calling each day to reserve their space. While families can also access SOP for the nights they need, they do not need to reserve nightly. Families do not necessarily stay consecutive nights at either shelter. Because a family might stay a subset of the nights for a given time period, we calculated length of stay based on the number of nights that a family checked in as present. We also looked at the range of dates that families engaged with the program (i.e., the difference between the first and last dates they stayed). Although SOP has fewer clients than FF staying overnight and/or connecting to services, SOP clients have longer stays where they are utilizing this resource.

	Stay Over Program (SOP)	First Friendship (FF)
Median length of stay (LOS)	20 days	3 days
Median range of days engaged with program	31 days	6 days

### Stay Over Program

**6,000** client-nights\*

**193** clients connected to services or staying overnight

### First Friendship

**5,357** client-nights

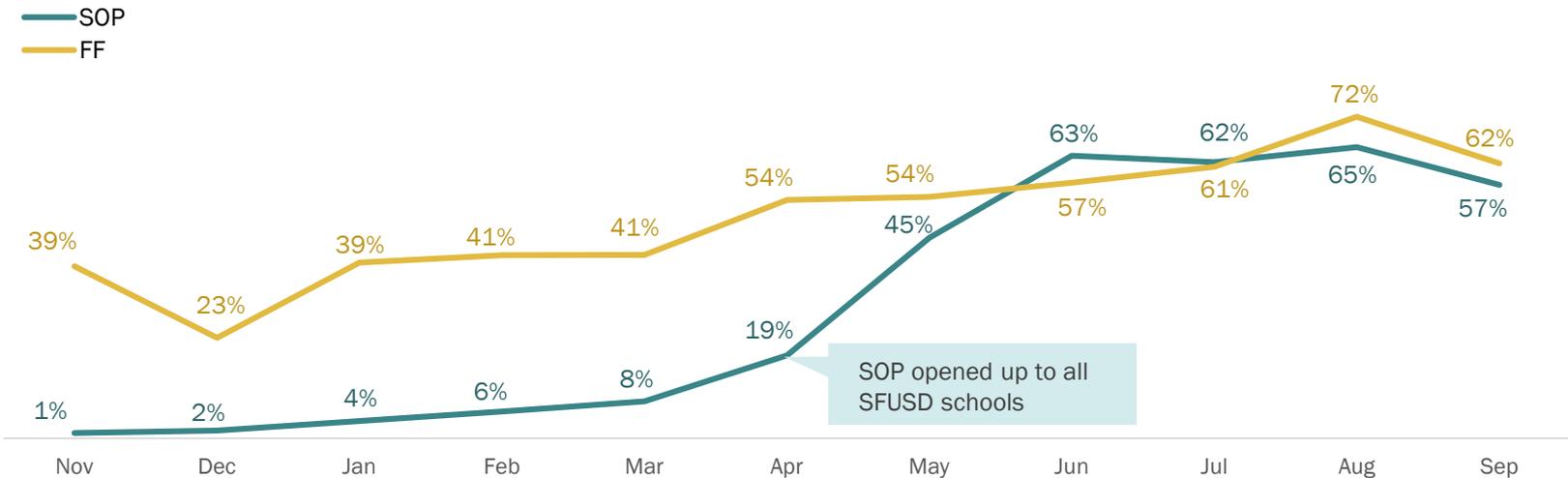
**449** clients staying overnight

# HOW DOES SOP COMPARE TO TRADITIONAL CONGREGATE SHELTERS FOR FAMILIES?

## Average monthly occupancy at SOP increased approximately eight-fold after SOP opened referrals to all SFUSD students in April 2019.

Looking at average occupancy each month, SOP initially had lower occupancy than FF but this gap decreased after SOP opened up to all SFUSD schools. Prior to SOP opening to all SFUSD schools, five families stayed overnight at SOP between November 15, 2018 and April 1, 2019. After SOP opened up to all SFUSD schools in April 2019, 51 families stayed overnight between April 2 and September 30, 2019.\* Occupancy is calculated as the number of clients checked in as present each night, divided by the total capacity. Nightly occupancy at SOP and FF ranged widely: from 0% to 92% at SOP, and from 10% to 106% at FF for the same time period.\*\* By the end of the evaluation period, SOP average monthly occupancy was similar to that of FF. Monthly occupancy levels at both SOP and FF indicate that there is additional congregate emergency shelter capacity for families.

### Average monthly occupancy



Source: HSH ONE System Data (from 11/15/2018 - 9/30/2019).

\* Some families that stayed at SOP during the first wave (11/15/2018-4/1/2019) continued to stay overnight after SOP opened to all SFUSD schools on 4/2/2019. In total, 55 families stayed at SOP from 11/15/2018 - 9/30/2019.

\*\* Nightly occupancy may exceed 100% during emergency shelter activations.

# HOW DOES SOP COMPARE TO TRADITIONAL CONGREGATE SHELTERS FOR FAMILIES?

Compared to FF, SOP has a 21% lower cost per bed per night.

To assess operational costs for emergency family shelters, we looked at cost per bed-night as a measure of the ongoing costs of having a shelter bed available as a resource every night for families experiencing homelessness. Both FF and SOP operate and are staffed independently of occupancy so that emergency shelter services can be available to families if needed. In addition to providing emergency shelter services like FF, SOP also delivers collaborative case management and may connect families to supportive services even if those families do not stay overnight. Cost per bed-night does not factor in these additional linkages made through the SOP model, which may further increase the cost effectiveness of SOP in connecting SFUSD families experiencing homelessness or housing insecurity to services.

	Stay Over Program (SOP)	First Friendship (FF)
Total contract cost*	\$1,229,892	\$3,981,123
Number of available <b>bed-nights</b> ** during contract period	35,640 bed-nights (11/15/2018 - 6/30/2020)	91,300 bed-nights (7/1/2016 - 6/30/2021)
Cost per <b>bed-night</b> ***	<b>\$34.51</b>	<b>\$43.60</b>

Source: HSH Contracts, Appendix B documents for Dolores Street-BVHM Contract and Providence-First Friendship Contract.  
 \* Contract costs cover only ongoing operating expenses, excluding one-time capital and start-up costs where possible, such as sleeping cots, mats, partitions, refrigerator, and storage furniture. As such, the total contract amount here may be lower than the total contract disbursement.  
 \*\* Available bed-nights are considered those nights that the shelter was operational multiplied by shelter capacity. For SOP, the operational period began Nov 15, 2018. For FF, the operational period began on their first contract date on July 1, 2016.  
 \*\*\* Cost per bed-night (or cost per bed per night) is calculated based on contract costs divided by bed-nights.

## HOW DOES SOP COMPARE TO TRADITIONAL CONGREGATE SHELTERS FOR FAMILIES?

Despite a lower cost per bed per night, SOP’s hourly average contracted program cost is \$16 more than FF’s, primarily due to shorter operating hours as SOP is constrained by school schedules and programming.

We compared the hourly average contracted program cost as another method for assessing costs. SOP is expected to have a higher hourly program cost than FF based on the total contract amount and projected shelter program operating hours, where SOP has fewer hours available to operate in the shelter space. FF has a higher total number of staff than SOP and a higher percentage of FF staff are funded by HSH (80%) compared to SOP’s staff (63%). The table below provides an overview of contract amounts, which may vary from actual invoiced costs. We did not adjust FF’s contracted amounts from 2016 for inflation, which would reduce the difference between hourly program costs.

	Stay Over Program (SOP)	First Friendship (FF)
Contract period	20.5 months (10/15/18 – 6/30/20)	60 months (7/1/16 – 6/30/21)
Total contract (\$)*	\$1.22 million	\$3.98 million
Total program hours (Projected)	8,498 hours	31,025 hours
Monthly program hours (Average)	414 hours/month	517 hours/month
<b>Hourly program cost (Total contract / Total projected program hours)</b>	<b>\$144.73/hour</b>	<b>\$128.32/hour</b>
Total number Of staff (FTE)	9.00 FTE	13.98 FTE
Staff funded by HSH (%)	5.68 FTE (63%)	11.17 FTE (80%)

Source: HSH Contracts, Appendix B documents for Dolores Street-BVHM June 6, 2019 Contract Amendment and Providence-First Friendship March 26, 2019 Contract Amendment.

\* Contract costs cover only ongoing operating expenses, excluding onetime capital and start-up costs.

# HOW DOES SOP COMPARE TO TRADITIONAL CONGREGATE SHELTERS FOR FAMILIES?

Given strong SFUSD commitment and support, SOP has a lower proportion of costs associated with the physical space for shelter operations compared to FF.

In comparison to FF, SOP has lower ongoing costs as a percentage of the program’s total operating budget\* for property rental and utilities, which may be attributed to shared costs with SFUSD made possible by SFUSD’s support in hosting SOP at a SFUSD school site. SOP may have higher insurance costs due to school location. As a new program, SOP’s equipment-related costs are due to necessary startup purchases of new equipment and facility items (such as storage furniture); these one-time costs are therefore excluded from this comparison of ongoing operational costs.

	Stay Over Program (SOP)		First Friendship (FF)**	
Salaries and benefits	<b>76.7%</b>	\$811,214	<b>65.8%</b>	\$1,454,653
Rental of property	<b>0.6%</b>	\$6,467	<b>11.4%</b>	\$252,000
Utilities	<b>1.9%</b>	\$20,248	<b>3.7%</b>	\$82,800
Building maintenance, supplies, and repair	<b>9.4%</b>	\$99,478	<b>8.6%</b>	\$190,341
Food supplies	<b>5.6%</b>	\$58,892	<b>5.3%</b>	\$116,256
Insurance	<b>1.7%</b>	\$17,489	<b>0.4%</b>	\$9,000
Other operating costs***	<b>4.2%</b>	\$44,170	<b>4.8%</b>	\$105,690

Source: HSH Contracts, Appendix B documents for Dolores Street-BVHM Contract and Providence-First Friendship Contract.

\* Budget composition is calculated by dividing the subtotal for each budget category by total contracted expenditures, excluding the one-time capital and start-up costs where possible and the standard 15% indirect rate.

\*\* For FF, percentages and amounts shown represent contract details for Years 3-5 due to budget modifications following Year 2.

\*\*\* Other operating costs include staff training, travel/transportation, administrative costs (e.g., office supplies, postage, printing), and other client need expenses.

## **Section 6.**

**What are the experiences and perceptions of key stakeholders?**

### **Overview of the section**

- Access Point staff
- Dolores Street staff
- SFUSD wellness staff

## WHAT ARE THE EXPERIENCES AND PERCEPTIONS OF KEY STAKEHOLDERS?

Interviews with key stakeholders underscored SOP's innovative features and accomplishments as well as opportunities for improvement.

### Physical space and school setting

■ Strengths ■ Challenges

- Families feel comfortable staying at SOP because of its space, which offers showers, meals, cots, and some privacy.
- Many features of the BVHM school site and physical space helped create a safe, positive environment for families.
- SOP feels more like a community than other shelters.
- The community's involvement and openness to SOP has been key to the launch and continued success of SOP.

- There are some operational constraints, such as limited time for setup and competing maintenance requests leading to delays, related to the gym space being at a school site.
- Capacity may become an issue as the program expands.

### Communication and partnerships

- Strong communication between school wellness staff, Dolores Street, and the Access Points has been key for handling increased capacity and are critical to making this program work.
- Forming positive working relationships with Access Points has empowered school wellness staff to better case manage and help families navigate the process to find supportive housing resources.

- Lack of clarity on Access Point roles and services may lead to misconceptions among families about what services they will receive at Access Points.
- There have been some gaps in information sharing between partners to verify student eligibility for accepting families into SOP.
- The quick program ramp-up and opening to all of SFUSD created some confusion around processes and expectations.

### Services

- The flexible model of SOP is able to meet families where they are.
- Monolingual families value SOP's Spanish-speaking staff and the high level of support provided.

- There seems to be a gap in case management for families and scaling up collaborative case management across all SFUSD schools may be challenging.
- Staff feel that there are opportunities to improve services by enhancing training and building understanding of Coordinated Entry processes and family shelter and trauma-informed systems.

### Policies

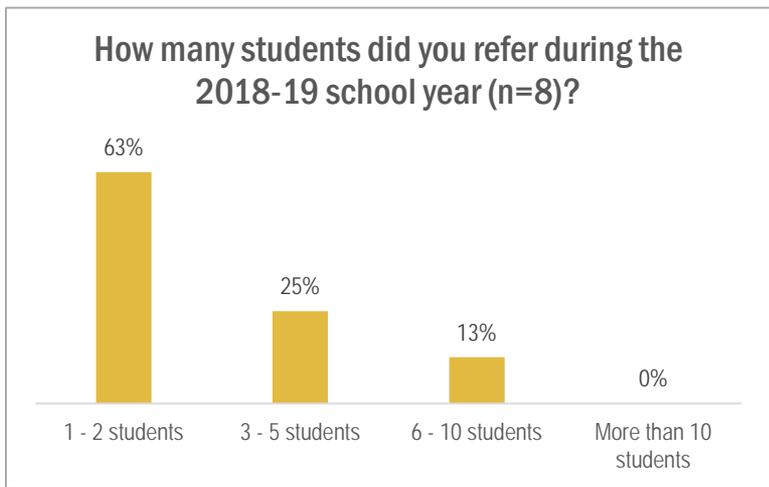
- Open reservation policies meet families where they are, by offering a safe place to sleep when needed.

- Current system policies such as family eligibility and shelter pet policies may be barriers to maximizing the pilot program's potential.

## WHAT ARE THE EXPERIENCES AND PERCEPTIONS OF KEY STAKEHOLDERS?

Of the five SFUSD wellness staff who reported hearing from teachers at their school, they all said SOP made it easier or had no impact on teachers’ ability to instruct.

Given SFUSD wellness staff’s important role in referring students and their families to SOP and providing case management services, 32 wellness staff from SFUSD schools engaged in SOP were invited to participate in an optional survey during September 2019 to share their perceptions of and experiences with SOP. The survey was completed by eight wellness staff each from different elementary, middle, and high schools, all of whom reported being “somewhat” or “very familiar” with SOP. The majority of wellness staff surveyed referred between one and two students to SOP during the last school year. Given the limited response to this brief anonymous survey, further engagement with school wellness staff will be important to understand their ongoing experiences with SOP and to support continuous improvement of SOP for SFUSD students and families.



**Half of the wellness staff surveyed reported that SOP reduced the time they spent working with students on homelessness or housing insecurity, while the remaining half said it did not make a difference.**

# Section 7.

## Conclusions & Recommendations

### Overview of the section

- Conclusions
- Recommendations

## CONCLUSIONS

- 1 In a relatively short time as a pilot program, SOP has provided a culturally responsive service that directly meets the needs of SFUSD Spanish-speaking families experiencing homelessness or housing instability for the first time.**
  - SOP connected many families who were not previously known to the City, especially families whose primary language is Spanish and were experiencing homelessness for the first time, to San Francisco’s overall system of supportive housing programs and services.
  - Since opening SOP to all SFUSD students, average monthly occupancy has increased approximately eight-fold, reaching similar occupancy levels as FF.
  - Families are utilizing SOP in different ways and connecting to other City resources, like transitional housing.
- 2 SOP provides a focused service in the spectrum of HSH services with unique features not present in other shelters.**
  - SOP not only provides a reliable, safe place to stay overnight but also an enhanced level of support to families with children enrolled at SFUSD experiencing homelessness or housing insecurity.
  - SOP is the first initiative that links the expertise and services of key interagency partners—shelter provider, SFUSD, Access Points, and HSH staff—in an innovative, collaborative model of hosting a family shelter at a school site.
- 3 Stakeholders used occupancy data to inform the program change to open SOP to all SFUSD schools, which significantly increased program utilization and cost effectiveness.**
  - SOP has lower costs per bed per night than Providence First Friendship, HSH’s lowest barrier congregate family shelter, in part due to its higher capacity.
  - Despite a lower cost per bed per night, SOP’s hourly average contracted program cost is \$16 more than FF’s, primarily due to shorter operating hours as SOP is constrained by school schedules and programming.
- 4 Most families and key stakeholders have had positive experiences with SOP.**
  - Most families had positive experiences and are grateful to have SOP as a place to stay when they need.
  - Stakeholders recognize the value of SOP and describe it as a great program and resource for families.
  - Dolores Street has created a family-oriented space that has encouraged a sense of community at SOP.
  - There is strong commitment among SOP partners to continue to make this program work for SFUSD families.

## RECOMMENDATIONS

We offer the following recommendations to support stakeholders in their continued planning and implementation with the goal of enhancing SOP's operations and services for families.

- 1 Maintain the current capacity and design of SOP given existing utilization levels.**
  - Utilization data indicates that SOP is appropriately sized in its current capacity of 60 beds to address temporary shelter needs of SFUSD families.
  - Continue to monitor program data including utilization, cost-effectiveness, and outcomes to inform any future changes to the model (see Recommendation #2), including replicating or expanding SOP.
  
- 2 Continue evaluation of process and outcome measures to understand SOP's longer-term effectiveness in connecting families experiencing homelessness or housing insecurity to more stable housing options.**
  - Continue to monitor and compare the following metrics for SOP to other comparable HSH programs: utilization, length of stay, actual invoiced costs, and housing outcomes (including housing referral status, next placement options, and any returns to homelessness within 6, 12, and 24 months).
  - Enhance HSH and SFUSD data sharing processes to use data to track longer-term student outcomes (attendance, social/emotional learning, and academic readiness) and assess any impacts of SOP.
  - Compare other measures like client satisfaction to other HSH programs across the system.
  
- 3 Further assess service gaps for people experiencing homelessness who are Hispanic/Latinx.**
  - Most SOP families identified as Hispanic/Latinx and were not previously known to the Homeless Response System, revealing possible unmet needs for this population. Further explore cultural and multilingual needs at Access Points to ensure equitable access to Coordinated Entry as well as outreach and engagement for other parts of the system.

## RECOMMENDATIONS

- 4 Explore training and training reinforcement opportunities for SOP staff and key partners.**
  - Clarify the roles and responsibilities of Access Points and SFUSD in order to provide accurate messaging to families and confirm expectations for the level of case management.
  - Build capacity for staff to provide services in the family shelter setting (e.g., trauma informed care), perhaps in alignment with other contracted providers.
  - Develop opportunities for partners to learn more about the overall housing referral process and policies to better support families.
  
- 5 Enhance and explore incentivizing data collection, monitoring, and reporting processes to support decision-making around key programmatic and policy issues.**
  - Explore opportunities to re-orient the SOP contract to incentivize streamlined reporting and continuous improvement of data quality, such as rewarding strong performance with bonus payment.
  - Collect information about students' schools in the ONE System to increase alignment and possible linkages with SFUSD.
  - Continue to partner with SFUSD to assess potential impacts of SOP on key student outcomes.
  - As data systems and processes change, communicate updated processes to all stakeholders involved and monitor reports to ensure front-end platforms and back-end data are consistent.
  - Allocate resources to validate front-end processes (e.g., client-facing) and alignment with ONE System reporting (both canned reports and backend reporting) to improve consistency and data quality.
  
- 6 Review whether SOP staffing levels are adequate to deliver high levels of service to families, ensure consistent use of systems and processes, and provide necessary oversight.**
  - Continue to work with SOP staff to reinforce consistent use of systems, understanding of policies, and continuously improve processes to work better for stakeholders.
  - Consider increasing SOP staffing to ensure oversight and accountability that strengthens the program's ability to deliver its services.
  
- 7 Assess current family shelter policies to ensure alignment with SOP goals.**
  - Review current system policies, such as family eligibility criteria, reservations during school breaks, and shelter pet policies, which may be barriers to getting families into services and maximizing SOP's potential.
  - Examine current processes and policies around SOP families' cumulative length of stay in congregate settings to ensure alignment across congregate shelters and support families' housing referrals for placements.

# Section 8.

## Appendices

### Overview of the section

- A. Evaluation methodology
- B. Family survey
- C. Interview protocol for families
- D. Stakeholder perceptions
- E. Interview protocols for Dolores Street and Access Point staff
- F. School staff survey

**Appendix A**

**Evaluation methodology**

# APPENDIX A: EVALUATION METHODOLOGY

To evaluate SOP, we engaged with key stakeholders to collect data utilizing the following methods.

QUANTITATIVE DATA SOURCES	<p><b>HSH ONE System Data</b></p>	<ul style="list-style-type: none"> <li>HSH’s Data and Performance team provided data from HSH ONE System for 193 individuals (or 59 families) who engaged with SOP between 11/15/2018 and 9/30/2019. Data included client demographics, client profiles’ first creation date, associated family members, prior residence, previous homelessness, Access Point assessments, length of stay at SOP (for those clients who stayed overnight), and program exits.</li> <li><b>Limitations:</b> Client demographics, prior residence, and previous homelessness are self-reported and there may be missing data where client doesn’t know, refused to answer, or data was not collected during program enrollment. Consistently capturing program exits is challenging, as shelter providers may not have the opportunity to conduct an exit interview before families move on to their next placement. ONE data does not currently include school data, so we were unable to characterize the number of referrals and participating SOP students from each school.</li> </ul>
	<p><b>HSH Contracts Data</b></p>	<ul style="list-style-type: none"> <li>HSH’s Contracts team provided executed contract agreements for SOP (10/2018 - 6/2020) and Providence First Friendship (7/2016 - 6/2021). Appendix A was used to compare the program features. Appendix B was used to compare contracted program costs.</li> <li><b>Limitations:</b> Analyses are based on contracted costs, which may differ from the actual program costs per submitted invoices. Due to the variable timeframes for submitting invoices, we were unable to analyze actual invoiced costs. Contracted costs by category for First Friendship only available for Years 3-5 due to budget modifications following year 2.</li> </ul>
	<p><b>SFUSD Administrative Data</b></p>	<ul style="list-style-type: none"> <li>SFUSD’s Research, Planning &amp; Assessment (RPA) unit provided aggregate data on chronic absenteeism for the following groups enrolled during the 2018-19 school year: participating SOP students (31 students), SFUSD students experiencing homelessness (1,898 students), and SFUSD students overall (54,017 students).</li> <li><b>Limitations:</b> Attendance data was only available for 31 participating SOP students because families may have utilized SOP during the summer, and attendance records are only available and relevant during the school year. There were also some participating students for whom we were unable to match identifiers to pull attendance data. The successful matching rate was comparable to SFUSD’s typical data matching levels. We were unable to further stratify attendance by school due to low sample size upon stratification. Due to variable start dates and different levels of program engagement across families (i.e., families first connected with SOP on different dates and stayed for different durations), we could not compare attendance for students before versus after SOP engagement. Due to concerns about overall sample size and variable length of intervention, we did not receive SFUSD formative assessment data for our evaluation, and thus unable to assess additional student outcomes.</li> </ul>

# APPENDIX A: EVALUATION METHODOLOGY

QUANTITATIVE DATA SOURCES	Surveys of SOP families	<ul style="list-style-type: none"> <li>City Performance designed a brief anonymous, optional survey (see Appendix B) of families staying overnight at SOP. Between 2/2019 and 9/2019, a representative (parent or guardian) from each family was asked to take the survey once during the first week of their stay. For families staying longer than one week, families were asked to answer a subset of questions from the first survey to capture any changes in their experience and additional feedback. Paper surveys were available in Arabic, Chinese, English, Spanish, Tagalog, and Vietnamese. Surveys were completed in English and Spanish.</li> <li><b>Limitations:</b> While 69% of all SOP families who stayed overnight were surveyed, the experiences captured may not be representative of all families staying at SOP. Surveys were anonymous; therefore, we were unable to track any individual family changes in experience or survey responses between the initial full and second shorter survey.</li> </ul>
	Surveys of SFUSD wellness staff	<ul style="list-style-type: none"> <li>City Performance designed a voluntary, anonymous online survey of SFUSD wellness staff for schools that referred at least one student to SOP during the 2018-19 school year (please see Appendix F). Surveys were administered to 32 wellness staff during 9/10/2019 - 9/25/2019, of which eight staff (representing eight schools) responded.</li> <li><b>Limitations:</b> Due to the relatively low survey response rate, we may not have achieved a representative sample of school wellness staff to assess impacts of SOP on school staff experiences.</li> </ul>
QUALITATIVE DATA SOURCES	Interviews with SOP families	<ul style="list-style-type: none"> <li>City Performance conducted semi-structured in-person interviews with four families who had stayed at SOP for at least 14 nights—three families who were currently staying at SOP as of the interview date and one family who had exited from SOP to their next placement. Interviews were designed to last approximately 45 minutes to one hour. Three interviews were conducted in English, and one interview was conducted in Spanish. Interviews were recorded with permission from each family. Each family received \$20 in prepaid gift cards after completion of the interview.</li> <li><b>Limitations:</b> Due to limited staffing capacity, we were unable to conduct more than four total in-depth interviews including one interview in Spanish and may not have reached data saturation.</li> </ul>
	Interviews with Dolores Street and Access Point staff	<ul style="list-style-type: none"> <li>City Performance conducted semi-structured in-person interviews with key stakeholders (see Appendix E). City Performance interviewed staff from Dolores Street Community Services on 2/13/2019 and 9/4-9/5/2019. City Performance interviewed Access Point staff from Compass Family Services and Catholic Charities on 8/9/2019.</li> <li><b>Limitations:</b> Interviews with Access Points were identified as a potential evaluation data source after our evaluation midpoint, so we did not have the opportunity to capture “pre” and “post” experiences of Access Points.</li> </ul>
	Advisory Group meetings	<ul style="list-style-type: none"> <li>City Performance hosted and facilitated four Advisory Group meetings before and during the evaluation period (on 10/3/2018, 11/8/2018, 3/7/2019, and 10/7/2019) to inform our evaluation design and reporting. Advisory Group members provided subject matter expertise and qualitative insights to help validate and contextualize our evaluation data. We have incorporated their feedback and insights as appropriate throughout this evaluation report.</li> </ul>

## APPENDIX A: EVALUATION METHODOLOGY

We worked with the following teams to collect data for this evaluation.

### Department of Homelessness and Supportive Housing (HSH)

**Family Shelters:** Scott Walton, Elisabet Medina

**Data & Performance and ONE System:** Valerie Caplan, Sarah Locher, Swati Pande

**Contracts:** Gabriel Canale

### Dolores Street Community Services

Laura Valdez, Saul Hidalgo, Jacqui Portillo, Mayra Sanchez

### San Francisco Unified School District

**Buena Vista Horace Mann School:** Claudia DeLarios Morán, Nick Chandler

**SFUSD Office of Counseling and Post-Secondary Success:** Mary Richards

**SFUSD Special Projects:** Joyanna Balk

**SFUSD Research, Planning, and Assessment Unit:** Devin Corrigan, Ritu Khanna

**SFUSD School Health Programs:** Terra Gauthier, Jennifer Donahue

### HSH Access Points

**Catholic Charities:** Rob Strahan, Michele Rimando

**Compass Family Services:** Megan Geary, Joanna Garcia

**Appendix B**

**Family survey**



# City and County of San Francisco



## Buena Vista Horace Mann Stay Over Program Survey

Your responses will be anonymous.

DATE: \_\_\_\_\_

1. Please rate how you are treated by staff at the Stay Over program (*circle one*):

Excellent                  Good                  Fair                  Poor                  No opinion/Don't know

2. Please rate the level of safety you feel at the Stay Over program (*circle one*):

Very Safe                  Somewhat Safe                  Neither Safe Nor Unsafe                  Somewhat Unsafe                  Very Unsafe

3. How many children are staying here with you? \_\_\_\_\_

Please list the age of each child staying with you: Child 1: \_\_\_\_\_ Child 2: \_\_\_\_\_ Child 3: \_\_\_\_\_ Child 4: \_\_\_\_\_

Which SFUSD school(s) does your child(ren) attend? \_\_\_\_\_

4. How does your child(ren) feel about staying at this school overnight? (*Please choose one.*)

- They really like (or are very comfortable) staying here.
- They sort of like (or are slightly comfortable) staying here.
- They neither like nor dislike (are neutral about) staying here.
- They somewhat dislike (or are slightly uncomfortable) staying here.
- They really dislike (or are very uncomfortable) staying here.

5. Where was your family staying immediately before coming to the Stay Over program here at Buena Vista Horace Mann? (*Please choose one.*)

- With family or friends
- A different shelter
- Unsheltered (e.g., outdoors, in a vehicle)
- Motel, hotel, or other temporary location
- Your own place (e.g., rented room, apartment, home)
- Other (please fill in): \_\_\_\_\_

6. When deciding to come to the Stay Over program, how important was it to you to be able to stay somewhere that you are familiar with (like your child's school or another school in SF Unified School District)? (*Please circle one.*)

Very Important                  Slightly Important                  Neither Important Nor Unimportant                  Slightly Unimportant                  Not important at all

7. Before coming to the Stay Over program, were you aware of any of the following options that might be available? (*Please choose all options that you have heard about.*)

- Other shelter sites
- Eviction prevention services
- Short-term rental assistance
- Transitional housing
- Affordable housing
- Access Points
- Help with relocating to a safe place that might be outside San Francisco

8. What are some things that you and your family like about the Stay Over program?

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

9. Do you have any suggestions for how the Stay Over program could be improved for you and your family?

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_



# City and County of San Francisco



DEPARTMENT OF HOMELESSNESS AND SUPPORTIVE HOUSING

## Buena Vista Horace Mann Stay Over Program Survey

Your responses will be anonymous.

DATE: \_\_\_\_\_

1. Please rate how you are treated by staff at the Stay Over program (*circle one*):

Excellent                  Good                  Fair                  Poor                  No opinion/Don't know

2. Please rate the level of safety you feel at the Stay Over program (*circle one*):

Very Safe                  Somewhat Safe                  Neither Safe Nor Unsafe                  Somewhat Unsafe                  Very Unsafe

3. How does your child(ren) feel about staying at this school overnight? (*Please choose one.*)

- They really like (or are very comfortable) staying here.
- They sort of like (or are slightly comfortable) staying here.
- They neither like nor dislike (are neutral about) staying here.
- They somewhat dislike (or are slightly uncomfortable) staying here.
- They really dislike (or are very uncomfortable) staying here.

4. What are some things that you and your family like about the Stay Over program?

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5. Do you have any suggestions for how the Stay Over program could be improved for you and your family?

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Encuesta del Programa Stay Over de Buena Vista Horace Mann

Sus respuestas serán anónimas.

FECHA: \_\_\_\_\_

1. Por favor califique el trato que usted recibe por parte del personal del programa Stay Over (encierre uno):

Excelente Bueno Regular Malo Sin opinión/No sé

2. Califique el nivel de seguridad que siente en el programa Stay Over (encierre uno):

Muy seguro Algo seguro Ni seguro ni inseguro Algo inseguro Muy inseguro

3. ¿Cuántos niños se están quedando aquí con usted? \_\_\_\_\_

Anote la edad de cada niño que se queda con usted: Niño 1: \_\_\_\_\_ Niño 2: \_\_\_\_\_ Niño 3: \_\_\_\_\_ Niño 4: \_\_\_\_\_

¿A qué escuela(s) del SFUSD asiste(n) su(s) hijo(s)? \_\_\_\_\_

4. ¿Cómo se siente(n) su(s) hijo(s) acerca de pasar la noche en esta escuela? (Seleccione uno.)

- A ellos les gusta mucho (o les es muy cómodo) quedarse aquí.
A ellos medio les gusta (o les es algo cómodo) quedarse aquí.
A ellos ni les gusta ni les disgusta (les es neutral) quedarse aquí.
A ellos medio les disgusta (o les es algo incómodo) quedarse aquí.
A ellos les disgusta mucho (o les es muy incómodo) quedarse aquí.

5. ¿Dónde se alojaba su familia inmediatamente antes de asistir al programa Stay Over aquí en Buena Vista Horace Mann? (Seleccione uno.)

- Con familiares o amigos
En un albergue diferente
Sin techo (p.ej., al aire libre, en un vehículo)
En un motel, hotel u otro lugar temporal
Su propio hogar (p.ej., un cuarto, casa o apartamento rentado)
Otro (por favor, rellene): \_\_\_\_\_

6. Al decidir asistir al programa Stay Over, ¿qué tan importante fue para usted poder quedarse en un lugar con el que esté familiarizado (como la escuela de su hijo(a) u otra escuela en el Distrito Escolar Unificado de SF)? (Encierre uno.)

Muy importante Algo importante Ni importante ni sin importancia Poco importante Para nada importante

7. Antes de asistir al programa Stay Over, ¿estaba enterado de alguna de las siguientes opciones que podrían estar disponibles? (Seleccione todas las opciones de las que ha oído hablar.)

- Otros albergues
Servicios de prevención de desalojo
Ayuda con la renta a corto plazo
Vivienda de transición
Vivienda económicamente accesible
Puntos de acceso
Ayuda para reubicarse en un lugar seguro que podría estar fuera de San Francisco

8. ¿Cuáles son algunas de las cosas que a usted y a su familia les gustan del programa Stay Over?

Blank lines for handwritten responses to question 8.

9. ¿Tiene alguna sugerencia para mejorar el programa Stay Over para usted y su familia?

Blank lines for handwritten responses to question 9.



Encuesta del Programa Stay Over de Buena Vista Horace Mann

Sus respuestas serán anónimas.

FECHA: \_\_\_\_\_

1. Por favor califique el trato que usted recibe por parte del personal del programa Stay Over (encierre uno):

Excelente                  Bueno                  Regular                  Malo                  Sin opinión/No sé

2. Califique el nivel de seguridad que siente en el programa Stay Over (encierre uno):

Muy seguro                  Algo seguro                  Ni seguro ni inseguro                  Algo inseguro                  Muy inseguro

3. ¿Cómo se siente(n) su(s) hijo(s) acerca de pasar la noche en esta escuela? (Seleccione uno.)

- A ellos les gusta mucho (o les es muy cómodo) quedarse aquí.
- A ellos medio les gusta (o les es algo cómodo) quedarse aquí.
- A ellos ni les gusta ni les disgusta (les es neutral) quedarse aquí.
- A ellos medio les disgusta (o les es algo incómodo) quedarse aquí.
- A ellos les disgusta mucho (o les es muy incómodo) quedarse aquí.

4. ¿Cuáles son algunas de las cosas que a usted y a su familia les gustan del programa Stay Over?

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5. ¿Tiene alguna sugerencia para mejorar el programa Stay Over para usted y su familia?

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# **Appendix C**

## **Interview protocol for families**

**EVALUATION OF STAY OVER PROGRAM (SOP)  
IN-DEPTH FAMILY INTERVIEWS**

**I. Interview Logistics**

1	Task	Notes
	Recruitment/ scheduling	<p>City Performance (CSA) will draft the outreach flyer to announce the opportunity to participate in family interviews, per HSH’s Family Advisory Council model. CSA will request support from DSCS to make outreach flyers available to all SOP participants (e.g., at check-in).</p> <p>There will be four interview slots available on proposed dates per outreach flyer. Interviews will be conducted at 6:00-6:45 pm before program check-in per recommendation from DSCS team. The first families to express interest/confirm availability will be scheduled in order until all interview slots are filled.</p>
2	Interviewees	<p>Up to 4 families total:</p> <ul style="list-style-type: none"> <li>• Three families that are <u>currently</u> staying at SOP</li> <li>• One family that has <u>exited</u> from SOP</li> </ul> <p>Eligibility criteria:</p> <ul style="list-style-type: none"> <li>• Families who are currently staying at SOP and have stayed overnight for at least 14 nights</li> <li>• Requesting interview with 1-2 representatives from family – must be 18+ and <u>not</u> a current SFUSD student</li> </ul>
3	Interview format	<ul style="list-style-type: none"> <li>• In-person interview with each family/family representative(s) lasting 45 minutes to 1 hour</li> <li>• For current SOP families, interviews will be conducted at the Buena Vista Horace Mann School Wellness Center. <ul style="list-style-type: none"> <li>○ For the interview with a family that has exited, the interview will be conducted at BHVM/SOP, or more convenient space located more centrally and convenient for family.</li> </ul> </li> <li>• Verbal consent will be confirmed prior to beginning interview</li> <li>• Interview to be recorded with permission from interviewee.</li> <li>• Spanish language support to be provided by HSH staff member.</li> </ul>
4	Gift card distribution	<p>One prepaid Visa cash gift card per family to be distributed at the end of interview (four \$20 gift cards available in total)</p>

**EVALUATION OF STAY OVER PROGRAM (SOP)  
IN-DEPTH FAMILY INTERVIEWS**

**II. Interview Protocol & Questions**

*Good evening, thank you for sitting down with me today to talk about your experience participating in the Stay Over Program here at Buena Vista Horace Mann school. The information you share today will help the San Francisco Department of Homelessness and Supportive Housing (HSH) and the City better understand how well new programs, like this Stay Over Program, are working for families with students going to school in SFUSD who may be experiencing housing insecurity. These questions should take about 45 min of time. Everything you say will be confidential, and your names will not be connected with what you say. **Do you still want to proceed with this interview?** [\*\*Document verbal consent]*

*Before we get started, I want to ask for your permission/consent to record our conversation—the recording will be used only for note-taking and analyses. And again, your name will not be used or connected to anything you say. **Would it be okay if I record our conversation?** [\*\*Document consent.]*

\*\*\*\*\*

1. How did you and your family learn about the Stay Over Program (or “SOP” as we’ll refer for the rest of our conversation)?
  - a. *[Probe]: was it through a teacher, counselor/school social worker, other parent, CBO, flyer at the school, etc.?*
  
2. Approximately how long have you and your family been coming to sleep overnight at the SOP? (Or approximately when did you first start staying overnight here at BVHM?)
  - a. How has your experience sleeping overnight here at SOP changed since you first started staying until now?
  
3. Before staying overnight here at the SOP, where were you most recently staying (e.g., street, car, motel/hotel/SRO, emergency shelter, other shelter, transitional housing, doubled up, formerly homeless)?
  
4. Before staying overnight here at SOP, were you **aware** of other shelter and housing options available through the City (like other shelters)?
  - a. *[Probe]: Have you previously stayed in some of these other City housing resources??*
  - b. If YES, how does your experience staying here in SOP compare to past experiences staying in other City housing resources (e.g., safety, trust)?
  
5. What made you decide to stay overnight at the SOP, compared to other options that might be available through San Francisco’s Department of Homelessness and Supportive Housing?
  - a. What (or who) were the key interactions in your decision to stay here overnight?
  - b. How much did it matter (or not) that this program was available through your children’s school, an organization you’re already familiar with?
  - c. Can you tell me more about why your family chose to engage with school staff (from your children’s school) about your housing needs?
  
6. Can you walk me through what a “typical” (or common) night staying here at the SOP looks like for you and your family, from when you arrive to check-in to when you leave the next morning?

## EVALUATION OF STAY OVER PROGRAM (SOP)

### IN-DEPTH FAMILY INTERVIEWS

7. What impacts, if any, has staying overnight at the SOP had on **your family**? On your **children who are students at an SFUSD school**?
  - a. *[Probe]* What has been the experience of your children who are students at an SFUSD school?
8. How, if at all, has staying at the SOP supported you and your family as you're looking for more stable housing?
  - a. What resources, if any, have you learned about since coming to the SOP?
  - b. Which (if any) have you connected with or looked into?
  - c. Did you know about these resources before coming to the SOP?
9. What have been your previous experiences with other City services and programs to help meet your family's housing needs?
10. Have you and your family gone to an Access Point?
  - a. If YES, what was your experience at the Access Point? Did you know about Access Points as a resource before staying overnight here at the SOP?
  - b. If NO, can you tell me more about some of your reasons why you have not gone to an Access Point?
11. What factors have **encouraged** you to continue staying overnight here at the SOP? What has been working well with staying here at the SOP?
12. What factors have been **barriers/challenges** in staying overnight here at the SOP? What has been difficult about staying here at the SOP?
  - a. What are things the program can do to create a safe and welcoming space for you and your family to stay overnight?
  - b. What have been some of the **barriers** your family has experienced in trying to secure permanent housing?

#### **FOR FAMILY THAT HAS EXITED:**

13. *Can you share why you exited the SOP?*
  - a. *If you are comfortable sharing with us, can you tell me where you and your family are living now?*
14. *How did the SOP affect your family's process to connect to more stable housing resources?*
15. *What do you believe was the **most helpful** resource or service through the SOP?*

16. Is there anything else you'd like you to share about your experience with the SOP?

**Appendix D**

**Stakeholder perceptions**

## APPENDIX D: STAKEHOLDER PERCEPTIONS

Interviews with the **Dolores Street** team underscored the innovative features of this pilot program model.

**Many features of the BVHM school site and physical space helped create a positive environment for families.**

Dolores Street staff reported SOP has some trust inherently associated with the site given its location at a school. The school gym has a space for dining and lounging separate from the sleeping area. The gym also has high ceilings and receives natural light, which helps create a greater feeling of space and openness. The school yard provides access to open space and play areas for children. SFUSD also invested in an extensive security system, which helps reinforce safety at SOP.

**Strong partnerships between the provider, Access Points, BVHM, HSH, and SFUSD are critical to making this program work.**

Dolores Street staff highlighted the collaborations with stakeholders as a defining feature and strength of SOP. Staff at BVHM champion this program for all SFUSD schools, not just BVHM. SFUSD and HSH demonstrated its commitment to the program through advocating and implementing opening up SOP to the entire district and through SFUSD's capital investments to the gym space. As a result of this collaboration, there are multiple ways that families can access services through SOP.

**Open reservation policies meet families where they are, by offering a safe place to sleep when needed.**

The current program structure has the level of flexibility necessary to align with families' needs as reported by the Dolores Street team. SFUSD families experiencing homelessness may need a place to stay on some nights and not others. Unlike other programs where families are expected to engage in the program consistently each night, SOP's current processes allow families to utilize SOP when they need a safe place to sleep.

## APPENDIX D: STAKEHOLDER PERCEPTIONS

The Dolores Street team also highlighted some of the challenges related to the quick ramp-up of this pilot program and the site location.

**There are some operational constraints related to the gym space being at a school site.**

Dolores Street staff noted the time constraints sharing gym space with other school programs poses during shelter setup and breakdown. Dolores Street also shared that maintenance issues are not always resolved quickly, perhaps due to competing priorities and requests across SFUSD. The delay in being able to address maintenance and capital improvements (such as increasing storage space) can be a barrier to families staying overnight.

**Current system policies on family eligibility and shelter pets may be barriers to maximizing the pilot program's potential.**

Because SOP is an interagency program, the Dolores Street team has had to navigate both HSH and SFUSD policies. For example, when determining eligibility for SOP, the team reported lack of clarity on how to support families whose children are about to begin school at SFUSD or are transferring from another district but are not officially SFUSD students. In addition, shelter policies that prohibit pets or prevent families from retaining their shelter spot if they travel during school breaks may feel punitive to families trying to maintain some degree of normalcy.

**Staff feel there are opportunities to improve training and build understanding of Coordinated Entry processes, family shelter settings, and trauma-informed systems.**

Compared to Dolores Street's other programs (which serve single adults), staff recognized that there are important differences when serving families, especially in congregate settings. Shelter staff with experience in the adult shelter setting need additional training for the family shelter setting (e.g., family-based trauma-informed systems). Dolores Street staff are also interested in learning more about HSH's Coordinated Entry prioritization process to help clients understand what services are available and advocate for their clients.

## APPENDIX D: STAKEHOLDER PERCEPTIONS

Interviews with **Access Point** staff emphasized additional strengths that encourage families to engage and stay at SOP.

**Families feel comfortable staying at SOP because of its space, on-site services, and Spanish language support.**

Access Point (AP) staff reported hearing from families that they feel more comfortable staying at SOP than FF because of the storage space, flexibility to stay on-site longer over the weekends, and showers. At SOP, partitions between each family's sleeping area provide families a little bit of privacy. Families appreciated the meals and cots. SOP also has Spanish-speaking staff to help support monolingual families, whereas FF currently does not.

**SOP feels more like a community than other shelters.**

According to AP staff who gathered insights from families, SOP families remain engaged with SOP because the Dolores Street team has created an environment focused on safety and community. At SOP, there is a shared space for parents and children to engage in a supportive environment. Parents feel linked in the shared experience of having children in an SFUSD school. Children are able to engage with peers who are also experiencing homelessness.

**Strong communication between school wellness staff, Dolores Street, and the Access Points has been key for handling increased capacity.**

AP staff cited the strong communication between school wellness staff and the Dolores Street Family and Community Engagement Coordinator as a critical factor to SOP's success scaling up and serving more clients since opening up referrals to all SFUSD schools. The direct connection between AP staff, school wellness staff, and Dolores Street enabled stakeholders to collaboratively support families beyond the scope of just one provider.

## APPENDIX D: STAKEHOLDER PERCEPTIONS

**Access Point staff also identified opportunities to increase alignment between stakeholders and streamline the process for families.**

**The quick program ramp-up and opening to all of SFUSD created some confusion around processes and expectations.**

AP staff reported that when SOP opened up to all SFUSD schools, there was not a clear process in place for managing referrals. This led to inconsistency in referrals between school wellness and AP staff, and an influx of emails to get signed release of information from families. Some AP staff were also confused about which schools were participating and the eligibility criteria for family referrals (e.g., whether families with students in pre-school are eligible).

**Lack of clarity around AP roles and services may lead to misconceptions among families about what services they will receive at APs.**

AP staff noted confusion among partners around the AP roles and services provided to families. AP staff are not case managers, though SFUSD and Dolores Street partners may have misinterpreted that AP staff are case managing SOP families for all SFUSD schools. As reported by AP staff, some SOP families thought they would receive extra services or higher prioritization.

**There seems to be a gap in case management for families.**

Although Dolores Street works closely with families and AP staff unofficially provide some case management services, SOP does not currently have a formal case manager for families. Case management is important to help families navigate the process to get into stable housing. As reported by AP staff, families may receive some case management from programs like the Homeless Prenatal Program; however, case management can be disjointed. Furthermore, if a family is not already connected with services, they may fall through cracks in the system.

## **Appendix E**

### **Interview protocols for Dolores Street and Access Point staff**

## Shelter Provider Interview – FIRST INTERVIEW

\*\*\*\*\*

*[Thank you for sitting down with me today. I have several questions to ask about you and your team's experience as the shelter providers here at the Buena Vista Horace Mann Stay Over pilot program. The time frame of reference will be the last 3 months, since mid-November. These questions should take about one and a half hours of time. Is that alright with everyone?]*

*Before we get started, I want to ask for your permission/consent to record our conversation only for note-taking and analyses purposes. Would it be okay with the group here if I record our conversation?]*

\*\*\*\*\*

1. First off, can we go around the room here and do a quick round of introductions? It would be great to hear what your role is, particularly with regards to the Stay Over program at Buena Vista Horace Mann?
  - a. In addition to the group here today, are there other staff from the Dolores Street Community Services team who are involved with the Stay Over program?
  - b. If so, how many staff? And what are their respective roles?
2. Thinking back on the past week, could you describe what a typical weeknight looked like (from when the first family checks in to when the last family checks out)?  
*(i.e., does not include set-up or break down)*
3. How would you describe the **reservation** process? In other words, what (if any) is your role in the family's reservation process?
  - a. Who are you working with in the reservation process?
  - b. What has been working well?
  - c. What have been some of the challenges?
4. What is the **set-up** process like?
  - a. How long does the set-up process take?
  - b. What has been working well?
  - c. What have been some challenges in the past week? Were these the same challenges as when the pilot program first began?
5. Would you describe what the **breakdown/teardown** process is like?
  - a. How long does the breakdown/teardown process take?
  - b. What has been working well?
  - c. What are some challenges that you encountered in the last week? Were these the same challenges as when the pilot program first began?
6. Can you describe the **mealttime** process? What does a typical dinnertime look like? What does breakfast look like?
  - a. What has been working well for dinner service? What have been some of the challenges with dinner service?
  - b. What has been working well for breakfast service? What have been some of the challenges with breakfast service?

7. Thinking of the last 3 months, how would you describe the operational impacts of running an emergency family shelter at a school site?
  - a. What, if any, benefits have you observed that are associated with using the school site?
  - b. How, if at all, have you had to adapt/adjust your model to fit the physical space of the BVHM school gym?
  - c. How, if at all, have you had to adapt/adjust your model to fit the needs of families participating in the Stay Over program?
  - d. Are there any other operational adjustments that you have made in the last 3 months?
  
8. On a scale of 1 to 10 (with 1 being “not effective at all” and 10 being “extremely effective”), how would you rate the effectiveness of using the school gym at Buena Vista Horace as a site to serve families experiencing homelessness or housing insecurity? Can you explain the reason for your rating?
  
9. *[If not already discussed]* In prior discussions, we have learned that there have been less families staying overnight than may have been initially anticipated. How would you describe the impacts, if any, of this lower occupancy on operating the Stay Over program?
  
10. Based on your experience working with families, what are key considerations when it comes to forming partnerships?
  - a. Can you describe your partnership with the school district (SFUSD)?
  - b. Can you describe your partnership with the Department of Homelessness and Supportive Housing (HSH)?
  - c. Are there any other key partners in this work?
  
11. Compared to the Dolores Shelter Program (another emergency shelter program that Dolores Street Community Services provides):
  - a. What are some advantages that the Stay Over program has?
  - b. What are some disadvantages that the Stay Over program has (or has had to overcome)?
  - c. As compared to operating adult shelter sites, what impacts (if any) has the family composition of the Stay Over program (i.e., having school-aged children on site) had on the operations of this site?
  
12. Over the past 3 months, what are three **strengths** of the Stay Over pilot program?
  
13. Over the past 3 months, what are three **opportunities for improvement** of the Stay Over pilot program?

## Shelter Provider POST Interview

\*\*\*\*\*

[“Thank you for sitting down with me today. I have several questions to ask about you and your team’s experience as the shelter providers here at the Buena Vista Horace Mann Stay Over pilot program, following up from our conversation earlier this year in February. These questions should take about one hour. **Is that alright with everyone?**”]

Before we get started, I want to ask for your permission/consent to record our conversation only for note-taking purposes. **Would it be okay with the group here if I record our conversation?”**]

\*\*\*\*\*

1. Since our first interview in February, have there been any changes in the number/level of staffing that Dolores Street as planned for operating the Stay Over program at Buena Vista Horace Mann?
  - a. If so, how many staff? And what are their respective roles?
  - b. How, if at all, was this change related to the increase in occupancy?
2. Since February, how (if at all) has the typical weeknight changed since the program’s soft-launch in November?
  - a. If there have been significant changes, what does a typical weeknight now look like? Can you walk me through what the current process would be for a family, from check-in in the evening, to leaving in the morning?
3. How, if at all, have Stay Over Program operations changed with the opening up of referrals beyond BVHM students only to all SFUSD students?
  - a. Impacts on **referral/reservation** process?
    - i. How similar (or different) is the current reservation process from the process during the last school year (before June) vs. over the summer (Jun-August)?
    - ii. What has been working well? What have been some of the challenges?
  - b. Impacts on the **set-up** process? Impacts on the **breakdown/teardown** process?
    - i. Approximately how long does the set-up process take?
    - ii. What (if any) impacts have the higher occupancy had on the set-up timeline?
    - iii. What has been working well? What have been some of the challenges?
  - c. Impacts on **check-in** process?
    - i. What (if any) impacts have the higher occupancy had on the check-in process?
    - ii. What has been working well? What have been some of the challenges?
  - d. Impacts on **mealtime**?
    - i. How similar (or different) are the mealtime processes for dinner vs. breakfast?
    - ii. How (if at all) has the breakfast process been affected by the opening up of SOP to students attending non-BVHM schools?
  - e. Impacts on **facilities** (e.g., showers, bathrooms, storage)?
    - i. What (if any) impacts have the higher occupancy had on facilities and other operations?
    - ii. What has been working well? What have been some of the challenges?
  - f. Impacts on **activities**?
    - i. What (if any) impacts have the higher occupancy had on families’ activity time?
    - ii. What has been working well? What have been some of the challenges?
  - g. Any other impacts?

- i. Wake-up time?
  - ii. Managing families?
  - iii. Any others?
- 4. Since we last talked in February, how would you describe the operational impacts of running an emergency family shelter at a school site?
  - a. What, if any, benefits have you observed that are associated with using the school site?
  - b. How, if at all, have you had to continue to adapt/adjust your model to fit the physical space of the BVHM school gym?
  - c. How, if at all, have you had to adapt/adjust your model to fit the needs of families since the Stay Over Program has opened up to other SFUSD students and their families?
  - d. Are there any other operational adjustments that you have made in the last 6 months?
- 5. What, if any, have been the impacts of system policies (e.g., shelter program rules and regulations) on families staying at the Stay Over Program?
  - a. How (if at all) has that affected families' decisions to stay (or not stay) overnight?
- 6. In our first interview, we discussed several key partners in your work in running the Stay Over Program. Can you describe your partnership (strengths/benefits, challenges) with:
  - a. The school district (SFUSD)?
  - b. Department of Homelessness and Supportive Housing (HSH)?
  - c. Access Points?
  - d. Are there any other key partners in this work?
- 7. Building on what we discussed in our first interview in February, how does running the Stay Over Program compare to the other housing/shelter programs that Dolores Street Community Services operates (e.g., Dolores Shelter Program)? Specifically:
  - a. What are some advantages that the Stay Over program has?
  - b. What are some disadvantages that the Stay Over program has (or has had to overcome)?
  - c. As compared to the other adult shelter program that DSCS operates, what impacts (if any) has the family composition of the Stay Over program (i.e., having school-aged children on site) had on the operations of this site?
- 8. On a scale of 1 to 10 (with 1 being "not effective at all" and 10 being "extremely effective"), how would you rate the effectiveness of using the school gym at Buena Vista Horace Mann School as a site to serve families experiencing homelessness or housing insecurity?
  - a. Can you explain the reason for your rating?
- 9. Over the past 6-7 months (since February), what are three **strengths** of the Stay Over pilot program?
- 10. Over the past 6-7 months (since February), what are three **opportunities for improvement** of the Stay Over pilot program?
- 11. Thinking ahead, what would be three **operational changes** that your team might want to make in a future (or continued) iteration of the Stay Over Program?

## Access Point Group Interview

\*\*\*\*\*

*["Thank you for sitting down with me today. I have several questions to ask about your experience as Access Point staff serving families that are engaging with City services by way of the Stay Over Program, the overnight family shelter pilot program at Buena Vista Horace Mann school for SFUSD students. The time frame of reference will be the last 9 or so months, since the Stay Over program's soft launch in mid-November. These questions should take about one hour of time. **Is it alright with everyone if I take notes on my laptop while we're talking?"**]*

\*\*\*\*\*

1. At a high level, what has been your experience of working with Stay Over Program (SOP) families that come to the Access Point for services?
  - a. What do you think are key factors for why families **do** choose to come to the Access Points?
  - b. What do you think might be barriers for why families **do not** come to the Access Points?
2. **We're thinking about Stay Over Program families as families with students at SFUSD who are connected through their school social workers and may (or may not) stay overnight at the BVHM overnight shelter site.** What are the pathways through which a SOP family engages with the Access Point (e.g., directly engage with AP, referred from SOP/DSCS, other)?
  - a. Where do the referrals come from?
3. Can you walk me through a "typical" (or common) scenario starting from when you receive a referral through SOP channels (e.g., school wellness staff or SFUSD central office) to when that family has exited from the system's continuum of services (either successfully or unsuccessfully)?
  - a. What happens after a SOP family arrives at the Access Point?
4. Can you describe your working relationship with key partners in this work? For instance, what has it been like working with HSH for the SOP specifically? The school district (BVHM, specific schools, central district)? Dolores Street Community Services team?
  - a. How is the collaboration with **SFUSD** and **DSCS** staff working?
  - b. Are there any other key partners in this SOP partnership?
5. What, if anything, changed with the opening up of referrals to not just BVHM families but families with students at other SFUSD schools?
  - a. What do you feel like are the enabling factors that support the scaling up (or maintaining at current levels)?
  - b. What are limiting factors/challenges?
6. When a SOP family arrives at the Access Point, do you know if they are a SOP family versus another SF family? In other words, are there any current processes that are slightly different for SOP families than for other families who may come to an Access Point?
  - a. We understand that SFUSD has slightly different criteria for homelessness/housing insecurity, as compared to HSH. What impact, if any, has that slight difference had on your workflows and engagement with families (e.g., families doubled-up are not getting assessed by HSH)?

7. From your experience, are there common themes that come up in your engagement with SOP families more than in your engagement with non-SOP families?
  - a. Are there particular services that are more commonly utilized for SOP families? Or have you noticed any patterns in how far along the continuum of services (e.g., eligibility assessment, problem-solving, shelter prioritization, and housing prioritization assessment)) families engage through?
  - b. What are the key variables that encourage families to remain engaged with SOP? (e.g., *connections to school social workers, connection to their school, etc.*)
8. Have you had cases where you were unable to offer SOP families any services when they came to the Access Point? And if so, would you be able to share what some barriers to those families accessing services were?
9. On a scale of 1 to 10 (with 1 being “not effective at all” and 10 being “extremely effective”), how would you rate the effectiveness of the Stay Over program as a model for getting families to engage with the City’s supportive services/homelessness response system? Can you explain the reason for your rating?
10. As staff at the Access Point, what are three **strengths** of the Stay Over pilot program?
  - a. For example, how if at all are families who were not previously engaged by HSH now linked to Access Points and the broader homeless response system? Why weren’t families previously connected to Access Points? Is there something unique about SOP compared to other congregate family shelters or the relationship with SFUSD that has had an impact?
11. What are three **limitations or opportunities for improvement** of the Stay Over pilot program?
  - a. Compared to the standard family engagement processes at Access Points, what impacts (if any) has SOP had Access Point processes and effectiveness?
12. For the Stay Over Program families that you’ve worked with, do you have a sense of where families are staying if they’re not staying overnight at Stay Over?
  - a. What might help that non-Stay Over option continue or become stable?

**Appendix F**

**School staff survey**

## Stay Over Program School Wellness Staff Survey

We want to know what you think about programs in your school district. The information from this voluntary Stay Over Pilot Program School Wellness Staff Survey will help the City/County of San Francisco and San Francisco Unified School District (SFUSD) understand school wellness staff's experiences of the Stay Over Program and may inform the design and implementation of future programs to support SFUSD students and their families.

This optional survey from the City/County of San Francisco is voluntary and will take 10 minutes or less. We hope you will help us by answering these survey questions by **Friday, September 20, 2019**. Your answers are anonymous and we will not be collecting your name. If you have any questions, please email Wendy Lee at [wendy.lee2@sfgov.org](mailto:wendy.lee2@sfgov.org).

If you want to continue taking this survey, please click "Next".

## Stay Over Program School Wellness Staff Survey

**\* 1. Which of the following best describes your current role at SFUSD?**

- School social worker
- Other wellness staff
- Other (please specify)

**\* 2. Which school are you a staff member at?**

- |  |   |
|--|---|
| <input type="radio"/> Alamo Elementary School                  | <input type="radio"/> James Denman Middle School                |
| <input type="radio"/> Balboa High School                       | <input type="radio"/> Jefferson                                 |
| <input type="radio"/> Bessie Carmichael Elementary             | <input type="radio"/> John Muir Elementary                      |
| <input type="radio"/> Bryant Elementary                        | <input type="radio"/> John O'Connell High                       |
| <input type="radio"/> Buena Vista Horace Mann Community School | <input type="radio"/> Lafayette Elementary                      |
| <input type="radio"/> Cesar Chavez Elementary                  | <input type="radio"/> Leola Havard Early Education School       |
| <input type="radio"/> Cleveland Elementary                     | <input type="radio"/> Lowell High                               |
| <input type="radio"/> Daniel Webster Elementary                | <input type="radio"/> Marshall                                  |
| <input type="radio"/> Dr George Washington Carver Elementary   | <input type="radio"/> Mission Education Center (MEC) Elementary |
| <input type="radio"/> Drew College Preparatory Academy         | <input type="radio"/> Mission High                              |
| <input type="radio"/> ER Taylor Elementary                     | <input type="radio"/> Moscone Elementary                        |
| <input type="radio"/> Gateway High School                      | <input type="radio"/> Rosa Parks Elementary                     |
| <input type="radio"/> Gateway Middle School                    | <input type="radio"/> Sanchez Elementary                        |
| <input type="radio"/> Guadalupe Elementary                     | <input type="radio"/> SF International High                     |
| <input type="radio"/> Harvey Milk Elementary                   | <input type="radio"/> Tenderloin Elementary                     |
| <input type="radio"/> Hillcrest Elementary                     | <input type="radio"/> Visitacion Valley                         |
| <input type="radio"/> Hilltop Special Services Center          | <input type="radio"/> Wallenberg High                           |
| <input type="radio"/> Hoover Middle School                     | <input type="radio"/> Willie Brown Middle School                |
| <input type="radio"/> Other (please specify)                   |   |

## Stay Over Program School Wellness Staff Survey

**\* 3. How do most teachers and staff feel about using one of the gyms at Buena Vista Horace Mann School at nighttime for the Stay Over Program?**

- I believe this is a very appropriate use of the school gym space.
- I believe this is a somewhat appropriate use of the school gym space.
- I believe this is a neither appropriate nor inappropriate use of the school gym space.
- I believe this is a somewhat inappropriate use of the school gym space.
- I believe this is a very inappropriate use of the school gym space.
- I do not understand what this question is asking about.

**\* 4. How would you describe the impacts, if any, of using one of the school gyms at Buena Vista Horace Mann School for the Stay Over Program?**

- Very positive
- Somewhat positive
- Neither positive nor negative
- Somewhat negative
- Very negative

**5. Can you briefly explain why you selected your answer in Question 4 above?**

## Stay Over Program School Wellness Staff Survey

**\* 6. How familiar are you with the Stay Over Program?**

- I am very familiar with the Stay Over Program.
- I am somewhat familiar with the Stay Over Program.
- I have heard of the Stay Over Program, but I am not sure what that is.
- I have not heard of the Stay Over Program before.

**\* 7. During the last school year (2018-19), how familiar were most teachers and staff at your school with the Stay Over Program being a resource for students?**

- Teachers and staff at my school were very familiar with the Stay Over Program.
- Teachers and staff at my school were somewhat familiar with the Stay Over Program.
- Teachers and staff at my school have heard of the Stay Over Program but were not sure what that is.
- Teachers and staff at my school have not heard of the Stay Over Program before.

**\* 8. During the last school year (2018-19), how many students have you referred to the Stay Over Program at Buena Vista Horace Mann (BVHM)?**

- 1 - 2 students
- 3 - 5 students
- 6 - 10 students
- More than 10 students

**\* 9. During the last school year (2018-19), how (if at all) has the Stay Over program affected the time you spent working with your students specifically on helping with their homelessness or housing insecurity?**

- Reduced the time that I spent by a lot
- Reduced the time that I spent a little
- Neither reduced nor increased the time I spent
- Increased the time that I spent a little
- Increased the time that I spent a lot

**10. During the last school year (2018-19), how (if at all) has the Stay Over program affected your interactions with those students who you've worked with specifically around their housing and housing insecurity?**

**11. From what you may have learned from teachers at your school during the last school year (2018-19), how (if at all) has the Stay Over program impacted teachers' abilities to teach classes?**

- |  |  |
|--|--|
| <input type="radio"/> A lot better             | <input type="radio"/> A little worse                               |
| <input type="radio"/> A little better          | <input type="radio"/> A lot worse                                  |
| <input type="radio"/> Neither better nor worse | <input type="radio"/> I have not heard from teachers at my school. |

**12. Can you briefly explain why you selected your answer in Question 11 above?**

**13. Can you briefly explain any barriers to families accepting referrals to the Stay Over Program?**

Stay Over Program School Wellness Staff Survey

**14. Do you have any additional comments that you would like to share about the Stay Over program?**

**From:** [Reports, Controller \(CON\)](#)  
**To:** [Calvillo, Angela \(BOS\)](#); [Mchugh, Eileen \(BOS\)](#); [BOS-Supervisors](#); [BOS-Legislative Aides](#); [Elsbernd, Sean \(MYR\)](#); [Bruss, Andrea \(MYR\)](#); [Kirkpatrick, Kelly \(MYR\)](#); [Cretan, Jeff \(MYR\)](#); [Kittler, Sophia \(MYR\)](#); [pkilkenny@sftc.org](mailto:pkilkenny@sftc.org); [Anatolia Lubos](#); [Rose, Harvey \(BUD\)](#); [Campbell, Severin \(BUD\)](#); [Newman, Debra \(BUD\)](#); [Docs, SF \(LIB\)](#); [CON-EVERYONE](#); [Dawson, Julia \(DPW\)](#); [Robertson, Bruce \(DPW\)](#); [King, Nicolas \(DPW\)](#); [Alameida, Ronald \(DPW\)](#); [Chin, Joe \(DPW\)](#); [Alberto, Dianne \(DPW\)](#); [Dea, Michelle \(DPW\)](#); [Higuera, Charles \(DPW\)](#)  
**Subject:** Issued – 2016 Public Health & Safety General Obligation Bond Funds Were Spent in Accordance With the Ballot Measure  
**Date:** Tuesday, January 14, 2020 2:53:03 PM

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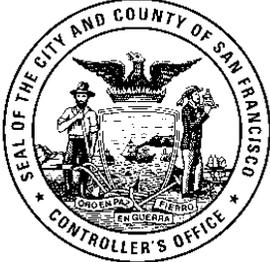
The Office of the Controller's City Services Auditor (CSA) today issued a report on its audit of 2016 Public Health and Safety Bond expenditures. The audit found that bond funds were spent in accordance with the ballot measure and were not used for any administrative salaries or other general governmental operating expenses other than those specifically authorized in the ballot measure for such bonds.

To view the report, please visit our website at:  
<http://openbook.sfgov.org/webreports/details3.aspx?id=2792>

This is a send-only e-mail address. For questions about the report, please contact Acting Chief Audit Executive Mark de la Rosa at [mark.p.delarosa@sfgov.org](mailto:mark.p.delarosa@sfgov.org) or 415-554-7574 or CSA at 415-554-7469.

Follow us on Twitter @SFController.

# 2016 Public Health and Safety General Obligation Bond Funds Were Spent in Accordance With the Ballot Measure



January 14, 2020

City & County of San Francisco  
Office of the Controller  
City Services Auditor

## About the Audits Division

The City Services Auditor (CSA) was created in the Office of the Controller through an amendment to the Charter of the City and County of San Francisco (City) that voters approved in November 2003. Within CSA, the Audits Division ensures the City's financial integrity and promotes efficient, effective, and accountable government by:

- Conducting performance audits of city departments, contractors, and functions to assess efficiency and effectiveness of service delivery and business processes.
- Investigating reports received through its whistleblower hotline of fraud, waste, and abuse of city resources.
- Providing actionable recommendations to city leaders to promote and enhance accountability and improve the overall performance and efficiency of city government.

### Team:

Snehi Basnet, Acting Supervising Auditor  
Hunter Wang, Senior Auditor

### Audit Consultant:

Cumming Construction Management, Inc.

For more information please contact:

Mark de la Rosa  
Acting Chief Audit Executive  
Office of the Controller  
City and County of San Francisco  
(415) 554-5393



<http://www.sfcontroller.org>



@sfcontroller



<https://www.linkedin.com/company/city-county-of-san-francisco-controllers-office/>

## Audit Authority

CSA conducted this audit under the authority of the San Francisco Charter, Section 3.105 and Appendix F, which requires that CSA conduct periodic, comprehensive financial and performance audits of city departments, services and activities.



**OFFICE OF THE CONTROLLER**  
CITY AND COUNTY OF SAN FRANCISCO

Ben Rosenfield  
Controller  
Todd Rydstrom  
Deputy Controller

January 14, 2020

Mr. Mohammed Nuru  
Director  
San Francisco Public Works  
1 Dr. Carlton B. Goodlett Place, Room 348  
San Francisco, CA 94102

Dear Mr. Nuru:

The Office of the Controller's City Services Auditor (CSA) presents its report of the audit of the City and County of San Francisco's 2016 Public Health and Safety (PH&S) General Obligation (GO) Bond Program, which is authorized to issue \$350 million in bonds and is administered by San Francisco Public Works (Public Works). CSA engaged Cumming Construction Management, Inc., (Cumming) to conduct the audit. The audit's objective was to evaluate whether bond funds were spent in accordance with the ballot measure authorizing the bonds.

Cumming tested \$59.1 million (75 percent) of \$78.5 million in expenditures for the 2016 PH&S GO bond program and found that all audited expenditures were spent in accordance with the ballot measure and that funds were not used for any administrative salaries or other general governmental operating expenses other than those specifically authorized in the ballot measure for such bonds.

CSA appreciates the assistance and cooperation of Public Works staff involved in this audit. For questions about the report, please contact me at [mark.p.delarosa@sfgov.org](mailto:mark.p.delarosa@sfgov.org) or 415-554-7574 or CSA at 415-554-7469.

Respectfully,

A handwritten signature in black ink, appearing to read "Mark de la Rosa".

Mark de la Rosa  
Acting Chief Audit Executive

cc: Board of Supervisors  
Budget Analyst  
Citizens Audit Review Board  
City Attorney  
Civil Grand Jury  
Mayor  
Public Library

**2016 PUBLIC HEALTH AND SAFETY EXPENDITURES AUDIT**

**CITY AND COUNTY OF SAN FRANCISCO GENERAL OBLIGATION BOND**

**01/06/2020**

## Executive Summary

The Office of the Controller's City Service Auditor (CSA) engaged Cumming Construction Management, Inc., (Cumming) to audit the expenditures of the 2016 Public Health and Safety (PH&S) General Obligation (GO) Bond Program of the City and County of San Francisco (City) to determine whether the bond funds were spent in accordance with the ballot measure and that no funds were used for any administrative salaries or other general governmental operating expenses.

The City has spent \$69,526,168 of the first bond issuance and \$8,944,874 of the second bond issuance as of the conclusion of the audit, excluding the cost of bond issuance and debt service cost. Cumming tested \$50,158,486 (72 percent) in expenditures of the first bond and \$8,892,552 (99 percent) in expenditures of the second bond issuance from the 2016 PH&S GO bond program. Cumming found that all audited expenditures were spent in accordance with the ballot measure and that funds were not used for any administrative salaries or other general governmental operating expenses other than those specifically authorized in the ballot measure for such bonds.

## Project Description

On June 7, 2016, San Francisco's voters approved Proposition A for the 2016 PH&S GO Bond. The Bond provided \$350 million in funding to the City, acting by and through San Francisco Public Works (Public Works), to finance the construction, acquisition and improvement of critical facilities that provide health and safety services to the City's residents. Public Works' expenditures can be categorized in the following programs:

1. Public Health Project  
*\$272 million budget to fund essential seismic retrofits and improvements at the Priscilla Chan and Mark Zuckerberg San Francisco General Hospital Building 5 and neighborhood clinics.*
2. Safety Project  
*\$58 million budget to fund the construction, acquisition, improvement, retrofitting and upgrade of the San Francisco Fire Department Ambulance Deployment Facility. The bond also includes funding for the repairs and modernization of neighborhood fire stations.*
3. Homeless Health and Safety Project  
*\$20 million budget to fund the construction, acquisition, improvement, retrofitting and upgrade of City-owned homeless shelters and homeless service sites. In addition, a portion of the bond can be used to acquire and construct facilities to expand the homeless services in the City.*

The proceeds of the first and second bond sale were expended for the programs and projects listed in Exhibit 1.

EXHIBIT 1	2016 Public Health and Safety Bond Program (2016 PH&S)		
	Program Name	Project / Vendor Name	1 <sup>st</sup> Bond Issuance Expenditure Amount
<b>PUBLIC HEALTH PROJECTS</b>			
	Zuckerberg San Francisco General Hospital Building 5 – Various projects	\$35,558,014	\$0
	Southeast Health Center Projects – Phases 1 and 2	\$6,057,177	\$0
	Community Health Centers	\$4,037,523	\$0
	2016 Public Health and Safety Bond A	\$177,145	\$1,953,846
	Public Health and Safety Master Project	\$13,465,111	\$0
	<b>TOTAL:</b>	<b>\$59,294,970</b>	<b>\$1,953,846</b>
<b>SAFETY PROJECTS</b>			
	Ambulance Deployment Facilities	\$5,317,572	\$4,693,811
	Neighborhood Fire Stations	\$780,855	\$0
	<b>TOTAL:</b>	<b>\$6,098,427</b>	<b>\$4,693,811</b>
<b>HOMELESS HEALTH AND SAFETY PROJECTS</b>			
	Homeless Services Project Management	\$362,180	\$0
	1001 Polk Street City-Owned Shelter	\$94,148	\$0
	260 Golden Gate Avenue City-Owned Shelter	\$134,764	\$0
	440 Turk Street	\$3,428,044	\$2,297,217
	525 5 <sup>th</sup> Street City-Owned Shelter	\$113,635	\$0
	<b>TOTAL:</b>	<b>\$4,132,771</b>	<b>\$2,297,217</b>
	<b>GRAND TOTAL:</b>	<b>\$69,526,168</b>	<b>\$8,944,874</b>

## Objective

The purpose of this audit was to determine whether the 2016 Public Health and Safety GO bond funds were spent in accordance with the ballot measure, including whether funds were used for any administrative or other general governmental operating expenses, which is impermissible unless specifically authorized in the ballot measure for such bonds.

## Methodology

To achieve the objective, Cumming collected and analyzed the following documents:

- Change orders;
- Design agreements and amendments;
- Purchase orders and/or work orders;
- Selected invoices and wire transfers;
- Public Works work orders and authorizations;
- Construction contracts;
- Public Works labor reports;
- Master Services Agreements;
- Reports from the City's financial system;
- Miscellaneous documents highlighting scopes of services provided.

Cumming reviewed expenditures totaling \$59,051,038, or approximately 75.3 percent of the \$78,471,042 that Public Works had spent under the 2016 Public Health and Safety GO bond program from the first and second bond issuances. A summary of the testing sample is shown in Exhibit 2.

<b>2016 Public Health and Safety Program</b>		
<b>Audit Testing Sample</b>		
Program Name	1 <sup>st</sup> Bond Issuance Testing Amount	2 <sup>nd</sup> Bond Issuance Testing Amount
Public Health Projects	\$42,565,216	\$1,953,846
Safety Projects	\$3,994,940	\$4,693,812
Homeless Health and Safety Projects	\$3,598,330	\$2,244,894
<b>TOTAL:</b>	<b>\$50,158,486</b>	<b>\$8,892,552</b>
<b>TOTAL PUBLIC WORKS EXPENDITURE:</b>	<b>\$69,526,168</b>	<b>\$8,944,874</b>
<b>PERCENTAGE TESTED:</b>	<b>72%</b>	<b>99%</b>

<b>TESTING TOTAL (FIRST &amp; SECOND BOND ISSUANCE):</b>	<b>\$59,051,038</b>
<b>TOTAL EXPENDITURES (FIRST &amp; SECOND BOND ISSUANCE):</b>	<b>\$78,471,042</b>
<b>PERCENTAGE TESTED:</b>	<b>75%</b>

This compliance audit was conducted by Cumming and performed in accordance with generally accepted government auditing standards. These standards require planning and performing the audit to obtain enough appropriate evidence to provide a reasonable basis for the findings and conclusions based on the audit objectives. Cumming believes that the evidence obtained provides a reasonable basis for the findings and conclusions based on the audit objectives.

## Results

**Finding 1 – Audited expenditures under the 2016 PH&S GO Bond Program were spent in accordance with the ballot measure, and funds were not used for any administrative or other general governmental operating expenses other than those specifically authorized in the ballot measure.**

Of the total \$59,051,038 reviewed, Cumming found that all the funds were spent in accordance with the ballot measure with sufficient documentation to support the scope of work for designated projects, programs, and other allowable expenses.

There is no recommendation for this finding. Public Works should continue to ensure bond expenditures are spent in accordance with the ballot measure and funds are not used for any administrative salaries or other general governmental operating expense

## Appendix: Department Response



London N. Breed  
Mayor

Mohammed Nuru  
Director

San Francisco Public Works  
1 Dr. Carlton B. Goodlett Pl.  
Room 348  
San Francisco, CA 94102  
tel 415-554-6920

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January 9, 2020

Mark de la Rosa  
Acting Chief Audit Executive  
Officer of the Controller, City Services Auditor, Audits Division  
1 Dr. Carlton B. Goodlett Place, Room 476  
San Francisco, CA 94102

RE: 2016 Public Health and Safety GO Bond Expenditures Audit

Dear Mr. de la Rosa:

Thank you for the opportunity to review the audit report prepared by your office and Cumming Construction Management. The auditors examined bond expenditures related to the 2016 Public Health & Safety Bond (PHS) General Obligation Bond Program. San Francisco Public Works manages this complex \$350 million bond program to deliver over 35 construction projects among six separate bond components on behalf of three clients: the San Francisco Department of Public Health, the San Francisco Fire Department, and the Department of Homelessness and Supportive Housing.

The report's finding that Public Works have spent bond funds in accordance with the ballot measure authorizing the bonds is consistent with our deliberate expenditure of bond proceeds, our respect for the laws governing bond expenditures, and our commitment to delivering projects to the people of San Francisco.

As always, the final audit report, and the in-depth conversations we had with the auditors who prepared it are essential contributions to our mission of delivering quality projects to the public on behalf of client departments.

Sincerely,

A handwritten signature in blue ink, appearing to read "Mohammed Nuru".

Mohammed Nuru  
Director

cc: Ronald Alameida, Acting City Architect and Deputy Director  
Charles Higuera, Acting Director of Project Management  
Joe Chin, PHS Program Manager  
Michelle Dea, Capital Projects & Program Controls Manager  
Dianne J. Alberto, Senior Analyst

**From:** [Mchugh, Eileen \(BOS\)](#)  
**To:** [BOS-Supervisors](#); [BOS-Legislative Aides](#); [BOS-Administrative Aides](#)  
**Cc:** [Calvillo, Angela \(BOS\)](#); [Somera, Alisa \(BOS\)](#); [PEARSON, ANNE \(CAT\)](#); [Kittler, Sophia \(MYR\)](#)  
**Subject:** Special Meeting of the Board of Supervisors  
**Date:** Friday, January 10, 2020 7:05:00 PM  
**Attachments:** [Special Meeting.pdf](#)

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Hello,

Please see the attached memo from President Norman Yee calling for a Special Meeting of the Board of Supervisors on January 21, 2020, to discuss File No. 191260 - Planning Code, Zoning Map - Establishing 12 Named Neighborhood Commercial Districts.

Thank you,

Eileen McHugh  
Executive Assistant  
Board of Supervisors  
1 Dr. Carlton B. Goodlett Place, City Hall, Room 244  
San Francisco, CA 94102-4689  
Phone: (415) 554-7703 | Fax: (415) 554-5163  
[eileen.e.mchugh@sfgov.org](mailto:eileen.e.mchugh@sfgov.org) | [www.sfbos.org](http://www.sfbos.org)

President, Board of Supervisors  
District 7



City and County of San Francisco

**NORMAN YEE**  
余鼎昂 市參事

Received 1/10/2020  
@ 4:58p.m.  
eu

DATE: January 9, 2020

TO: Angela Calvillo, Clerk of the Board of Supervisors

FROM: President Norman Yee 

CC: Members of the Board of Supervisors  
Anne Pearson, Office of the City Attorney  
Mayor's Office

SUBJECT: Special Board of Supervisors Meeting on Tuesday, January 21, 2020

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Dear Madam Clerk:

I am calling for a Special Board of Supervisors Meeting on Tuesday, January 21, 2020 at 2:00pm to hear the following item:

**191260 Planning Code, Zoning Map - Establishing 12 Named Neighborhood Commercial Districts**

**Sponsors:** Ronen, Fewer, Walton, Haney, Preston, Yee

Ordinance amending the Planning Code to establish 1) the Inner Balboa Street Neighborhood Commercial District (NCD) generally including the properties along Balboa Street between 2nd and 8th Avenues, 2) the Outer Balboa Street NCD generally including the properties along Balboa Street between 32nd and 39th Avenues, 3) the Bayview NCD generally including the properties along 3rd Street from Yosemite to Jerrold Avenues, 4) the Cortland Avenue NCD generally including the properties along Cortland Avenue between Bonview and Folsom Streets, 5) the Geary Boulevard NCD generally including the properties along Geary Boulevard between Masonic and 28th Avenues, 6) the Mission Bernal NCD generally including the properties along Mission Street between Cesar Chavez and Randall Streets, 7) the San Bruno Avenue NCD generally including the properties along San Bruno Avenue between Hale and Olmstead Streets, 8) the Cole Valley NCD generally including the properties along Cole Street from Frederick to Grattan Streets and some parcels north of Carl Street and south of Parnassus, 9) the Lakeside Village NCD generally including the properties along Ocean Avenue between Junipero Serra Boulevard to 19th Avenue, 10) the Lower Haight Street NCD generally including the properties along Haight Street between Webster and Steiner Streets, 11) the Lower Polk Street NCD generally including non-contiguous properties along Polk Street from Geary Boulevard to Golden Gate Avenue with frontage on Geary

President, Board of Supervisors  
District 7



City and County of San Francisco

**NORMAN YEE**  
余鼎昂 市參事

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**MEMORANDUM**

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Boulevard, Golden Gate Avenue, and other side streets, and 12) the Inner Taraval NCD generally including the properties along Taraval Street from 19th to Forest Side Avenues; amending the Zoning Map to include the new Neighborhood Commercial Districts; affirming the Planning Department's determination under the California Environmental Quality Act; making findings of consistency with the General Plan, and the eight priority policies of Planning Code, Section 101.1; and adopting findings of public necessity, convenience, and welfare under Planning Code, Section 302.

Thank you in advance to you and your staff for accommodating this Special Meeting request.

BOS-11

**Commissioners**  
**Eric Sklar, President**  
Saint Helena

**Jacque Hostler-Carmesin, Vice President**  
McKinleyville

**Russell E. Burns, Member**  
Napa

**Peter S. Silva, Member**  
Jamul

**Samantha Murray, Member**  
Del Mar

STATE OF CALIFORNIA  
Gavin Newsom, Governor

## Fish and Game Commission



**Melissa Miller-Henson**  
**Executive Director**  
P.O. Box 944209  
Sacramento, CA 94244-2090  
(916) 653-4899  
[fgc@fgc.ca.gov](mailto:fgc@fgc.ca.gov)  
[www.fgc.ca.gov](http://www.fgc.ca.gov)

*Wildlife Heritage and Conservation*  
*Since 1870*

January 10, 2020

TO ALL INTERESTED AND AFFECTED PARTIES:

This is to provide you with a copy of the notice of proposed regulatory action relative to subsection (f) of Section 5.87, and subsection (b)(91.1) of Section 7.50, Title 14, California Code of Regulations, relating to Klamath River Basin sport fishing regulations, which will be published in the California Regulatory Notice Register on January 10, 2020.

Please note the dates of the public hearings related to this matter and associated deadlines for receipt of written comments. Additional information and associated documents may be found on the Fish and Game Commission website at [www.fgc.ca.gov/Regulations/2020-New-and-Proposed](http://www.fgc.ca.gov/Regulations/2020-New-and-Proposed).

**Wade Sinnen, Senior Environmental Scientist, Department of Fish and Wildlife, has been designated to respond to questions on the substance of the proposed regulations. Mr. Sinnen can be reached by telephone at (707) 822-5119 or by email at [Wade.Sinnen@wildlife.ca.gov](mailto:Wade.Sinnen@wildlife.ca.gov).**

Sincerely,

Craig Castleton  
Associate Governmental Program Analyst

Attachment

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BOARD OF SUPERVISORS  
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## **TITLE 14. Fish and Game Commission Notice of Proposed Changes in Regulations**

**NOTICE IS HEREBY GIVEN** that the Fish and Game Commission (Commission), pursuant to the authority vested by sections 200, 205, 265, 270, 315, 316.5, 399, and 2084 of the Fish and Game Code and to implement, interpret or make specific sections 200, 205, 265, 270, 316.5, and 2084 of said Code, proposes to amend subsection (f) of Section 5.87 and subsection (b)(91.1) of Section 7.50, Title 14, California Code of Regulations, relating to Klamath River Basin sport fishing regulations.

### **Informative Digest/Policy Statement Overview**

Unless otherwise specified, all section references in this document are to Title 14 of the California Code of Regulations (CCR).

The Klamath River Basin, which consists of the Klamath River and Trinity River systems, is managed for fall-run Chinook Salmon (*Oncorhynchus tshawytscha*) through a cooperative system of State, federal, and tribal management agencies. Salmonid regulations are designed to meet natural and hatchery escapement needs for salmonid stocks, while providing equitable harvest opportunities for ocean sport, ocean commercial, river sport, and tribal fisheries.

The Pacific Fishery Management Council (PFMC) is responsible for adopting recommendations for the management of sport and commercial ocean salmon fisheries in the Exclusive Economic Zone (three to 200 miles offshore) off the coasts of Washington, Oregon, and California. When approved by the Secretary of Commerce, these recommendations are implemented as ocean salmon fishing regulations by the National Marine Fisheries Service (NMFS).

The Commission adopts regulations for the ocean salmon sport (inside three miles) and the Klamath River Basin (in-river) sport fisheries, which are consistent with federal fishery management goals.

Tribal entities within the Klamath River Basin maintain fishing rights for ceremonial, subsistence, and commercial fisheries that are managed consistent with federal fishery management goals. Tribal fishing regulations are promulgated by the tribes.

### **Klamath River Fall-Run Chinook Salmon**

Adult Klamath River fall-run Chinook Salmon (KRFC) harvest allocations and natural spawning escapement goals are established by the PFMC. The Klamath River Basin in-river sport salmon fishery is managed using adult quotas.

The KRFC harvest allocation between tribal and non-tribal fisheries is based on court decisions and allocation agreements between the various fishery representatives.

For the purpose of implementing PFMC adult allocation and California Department of Fish and Wildlife (Department) salmon fishery harvest assessment, within the Klamath River Basin the Department currently considers 22 inches total length as a provisional cutoff. Salmon greater than 22 inches total length are defined as adult salmon (ages 3-5) and salmon less than or equal to 22 inches total length are defined as grilse salmon (age-two).

## **PFMC Overfishing Review**

KRFC stocks have been designated as “overfished” by the PFMC. This designation is the result of not meeting conservation objectives for this stock. Management objectives and criteria for KRFC are defined in the PFMC Salmon Fishery Management Plan (FMP). The threshold for overfished status of KRFC is a three-year geometric mean less than or equal to 30,525 natural area adult spawners. This threshold was not met for KRFC during the 2015-2017 period. The 30,525 KRFC natural area adult spawners is considered the minimum stock size threshold, per the FMP. The KRFC adult natural area spawning escapement for 2018 was 53,624 natural area adult spawners, which exceeded the one-year conservation threshold of 40,700 natural area adult spawners. The three-year geometric mean is still less than the required 40,700 natural area adult spawners, therefore the KRFC are still considered as an “overfished” stock.

Accordingly, the FMP outlines a process for preparing a “rebuilding plan” that includes assessment of the factors that led to the decline of the stock, including fishing, environmental factors, model errors, etc. The rebuilding plan includes recommendations to address conservation of KRFC, with the goal of achieving rebuilt status. Rebuilt status requires meeting a three-year geometric mean of 40,700 adult natural area KRFC spawner escapement. The plan developed by representatives of NMFS, PFMC, U.S. Fish and Wildlife Service, California Department of Fish and Wildlife (Department), and Tribal entities, was submitted to the PFMC in February 2019, adopted by the PFMC in June 2019 and submitted to the NMFS in August 2019. Forthcoming recommendations from the rebuilding plan may alter how KRFC are managed in the future, including changing the in-river allocation number, and/or allocating less than the normal target number.

## **KRFC Allocation Management**

The PFMC 2019 allocation for the Klamath River Basin sport harvest was 7,637 adult KRFC. Preseason stock projections of 2020 adult KRFC abundance will not be available from the PFMC until March 2020. The 2020 basin allocation will be recommended by the PFMC in April 2020 and presented to the Commission for adoption as a quota for the in-river sport harvest at its May 2020 teleconference meeting.

The Commission may modify the KRFC in-river sport harvest quota, which is normally a minimum of 15 percent of the non-tribal PFMC harvest allocation. Commission modifications need to meet biological and fishery allocation goals specified in law or established in the FMP.

The annual KRFC in-river sport harvest quota is specified in subsection 7.50(b)(91.1)(D)1. The quota is split between four geographic areas with a subquota for each area, expressed as a percentage of the total in-river quota, specified in subsection 7.50(b)(91.1)(D)2. For angler convenience, the subquotas, expressed as the number of fish, are listed for the affected river segments in subsection 7.50(b)(91.1)(E). The in-river sport subquota percentages are shown in Figure 1, and are as follows:

1. for the main stem Klamath River from 3,500 feet downstream of the Iron Gate Dam to the Highway 96 bridge at Weitchpec -- 17 percent of the in-river sport quota;
2. for the main stem Klamath River from downstream of the Highway 96 bridge at Weitchpec to the mouth -- 50 percent of the in-river sport quota;

3. for the Trinity River downstream of the Old Lewiston Bridge to the Highway 299 West bridge at Cedar Flat -- 16.5 percent of the in-river sport quota; and
4. for the Trinity River downstream from the Denny Road bridge at Hawkins Bar to the confluence with the Klamath River -- 16.5 percent of the in-river sport fishery quota.

### **Proposed Changes**

Because the PFMC recommendations are not known at this time, ranges are shown in [brackets] in the proposed regulatory text below of bag and possession limits which encompass historical quotas. A range is also shown for the Department's grilse salmon size limit cutoff delineating between adult and grilse salmon. All are proposed for the 2020 KRFC fishery in the Klamath and Trinity rivers. The final KRFC bag and possession limits will align with the final federal regulations to meet biological and fishery allocation goals specified in law, or established in the FMP.

### **KRFC SPORT FISHERY (QUOTA MANAGEMENT):**

Quota: For public notice requirements, the Department recommends the Commission consider a quota range of 0–67,600 adult KRFC in the Klamath River Basin for the in-river sport fishery. This recommended range encompasses the historical range of the Klamath River Basin allocations and allows the PFMC and Commission to make adjustments during the 2020 regulatory cycle.

Subquotas: The proposed subquotas for KRFC stocks are as follows:

- Main stem Klamath River from 3,500 feet downstream of the Iron Gate Dam to the Highway 96 bridge at Weitchpec -- 17 percent of the total quota equates to [0-11,492];
- Main stem Klamath River from downstream of the Highway 96 bridge at Weitchpec to the mouth -- 50 percent of the total quota equates to [0-33,800];
- Trinity River downstream of the Old Lewiston Bridge to the Highway 299 West bridge at Cedar Flat -- 16.5 percent of the total quota equates to [0-11,154]; and
- Trinity River downstream from the Denny Road bridge at Hawkins Bar to the confluence with the Klamath River -- 16.5 percent of the total quota equates to [0-11,154].

Seasons: No changes are proposed for the Klamath River and Trinity River KRFC seasons:

- Klamath River - August 15 to December 31
- Trinity River - September 1 to December 31

Bag and Possession Limits: As in previous years, no retention of adult KRFC is proposed once the subquota has been met.

### ***KRFC Size Limit (Grilse Size Considerations)***

The Department is proposing a grilse salmon size limit cutoff range of less than or equal to 22 inches (55.9 cm) to 23 inches (58.4 cm) total length (TL) for discussion before the Department makes a final recommendation. Considered in this context, the size limit cutoff discussion is a trade-off between restricting take of the available adult salmon and quota management versus increasing harvest of

two-year-old grilse salmon. In preparation for the proposed regulatory changes for the 2020 KRFC in-river recreational fishing season, the Department has completed an evaluation of the potential impacts to KRFC from increasing the size limit cutoff distinguishing age-two fish from age-three fish for in-river recreational harvest (Appendix A to the Initial Statement of Reasons - ISOR). The Department analyzed a range of grilse size limits between 21 and 24 inches total length. A 21 inch TL size limit was considered overly conservative, and would prevent fishing opportunity on grilse KRFC with little benefit to adult stocks. Raising the maximum grilse size to 24 inches TL was considered too liberal. The range of proposed bag and possession limits for KRFC stocks are as follows:

- Bag Limit - [0-4] Chinook Salmon – of which no more than [0-4] fish over [22-23] inches total length may be retained until the subquota is met, then 0 fish over [22-23] inches total length.
- Possession limit - [0-12] Chinook Salmon of which no more than [0-4] fish over [22-23] inches total length may be retained when the take of salmon over [22-23] inches total length is allowed.

### **KRSC SPORT FISHERY:**

The Klamath River Basin also supports Klamath River spring-run Chinook Salmon (KRSC). Presently, KRSC stocks are not managed or allocated by the PFMC. No regulatory changes are proposed for the general KRSC opening and closing season dates, and bag, possession and size limits.

### ***Brown Trout Bag and Possession Limit Increase on the Main Stem Trinity River***

The Department is proposing to increase the daily bag and possession limit for Brown Trout on the main stem of the Trinity River from a five fish daily bag/10 fish possession limit to a 10 fish daily bag/20 fish possession limit. This proposed change will increase fishing opportunity on a non-native trout species. As the focus for the Trinity River is on native fish production, a reduction of brown trout may help enhance habitat availability for native fish, consistent with the goals of the federally-administered Trinity River Restoration Program.

### ***Other Changes for Clarity***

The Department is proposing additional changes for clarity, as follows:

1. Amend subsection 5.87(f) to ensure that the size limit cutoff between a grilse and adult Chinook Salmon in the Klamath River Basin is consistent with the size limit cutoff listed in subsection 7.50(b)(91.1).
2. Add paragraph (3) to subsection 7.50(b)(91.1)(A) to include a reference to Section 1.74, Title 14, CCR for sport fish report card requirements.
3. Amend the heading of subsection 7.50(b)(91.1)(A) to read, "Restrictions and Requirements."
4. Throughout the regulatory text in subsection 7.50(b)(91.1), update the year from 2019 to 2020.

## **Benefits of the Proposed Regulations**

The Commission anticipates benefits to the environment in the sustainable management of Klamath River Basin salmonid resources.

Other benefits of the proposed regulations are conformance with federal fishery management goals, health and welfare of California residents and promotion of businesses that rely on salmon sport fishing in the Klamath River Basin.

## **Consistency and Compatibility with Existing Regulations**

Article IV, Section 20 of the State Constitution specifies that the Legislature may delegate to the Fish and Game Commission such powers relating to the protection and propagation of fish and game as the Legislature sees fit. The Legislature has delegated authority to the Commission to promulgate sport fishing regulations (Fish and Game Code sections 200, 205, 315, and 316.5). The Commission has reviewed its own regulations and finds that the proposed regulations are neither inconsistent nor incompatible with existing State regulations. Commission staff has searched the California Code of Regulations and has found no other State regulations related to sport fishing in the Klamath River Basin.

**NOTICE IS GIVEN** that any person interested may present statements, orally or in writing, relevant to this action at a hearing to be held in the California Natural Resources Building Auditorium, 1416 Ninth Street, Sacramento, California, 95814 on Friday, February 21, 2020 at 8:30 a.m., or as soon thereafter as the matter may be heard.

**NOTICE IS ALSO GIVEN** that any person interested may present statements, orally or in writing, relevant to this action at a hearing to be held in the California Natural Resources Building Auditorium, 1416 Ninth Street, Sacramento, California, 95814 on Thursday, April 16, 2020 at 8:30 a.m., or as soon thereafter as the matter may be heard.

**NOTICE IS ALSO GIVEN** that any person interested may present statements, orally or in writing, relevant to this action at a teleconference hearing originating in the Commission's conference room, 1416 Ninth Street, Suite 1320, Sacramento, California, 95814, on Thursday, May 14, 2020, at 8:30 a.m., or as soon thereafter as the matter may be heard. It is requested, but not required, that written comments be submitted on or before Friday, May 1, 2020 at the address given below, or by email to [FGC@fgc.ca.gov](mailto:FGC@fgc.ca.gov). Written comments mailed, or emailed to the Commission office, must be received before 12:00 noon on Monday, May 11, 2020. All comments must be received no later than Thursday, May 14, 2020, at the teleconference hearing. If you would like copies of any modifications to this proposal, please include your name and mailing address. Mailed comments should be addressed to Fish and Game Commission, PO Box 944209, Sacramento, CA 94244-2090.

## **Availability of Documents**

Copies of the Notice of Proposed Action, the Initial Statement of Reasons, and the text of the regulation in underline and strikeout format can be accessed through the Commission website at [www.fgc.ca.gov](http://www.fgc.ca.gov). The regulations as well as all related documents upon which the proposal is based (rulemaking file), are on file and available for public review from the agency representative, Melissa Miller-Henson, Executive Director, Fish and Game Commission, 1416 Ninth Street, Box 944209,

Sacramento, California 94244-2090, phone (916) 653-4899. Please direct requests for the above mentioned documents and inquiries concerning the regulatory process to Melissa Miller-Henson or Craig Castleton at the preceding address or phone number. **Wade Sinnen, Senior Environmental Scientist, Department of Fish and Wildlife, (707) 822-5119 or [Wade.Sinnen@wildlife.ca.gov](mailto:Wade.Sinnen@wildlife.ca.gov), has been designated to respond to questions on the substance of the proposed regulations.**

### **Availability of Modified Text**

If the regulations adopted by the Commission differ from but are sufficiently related to the action proposed, they will be available to the public for at least 15 days prior to the date of adoption. Circumstances beyond the control of the Commission (e.g., timing of Federal regulation adoption, timing of resource data collection, timelines do not allow, etc.) or changes made to be responsive to public recommendation and comments during the regulatory process may preclude full compliance with the 15-day comment period, and the Commission will exercise its powers under Section 265 of the Fish and Game Code. Regulations adopted pursuant to this section are not subject to the time periods for adoption, amendment or repeal of regulations prescribed in Sections 11343.4, 11346.4, 11346.8 and 11347.1 of the Government Code. Any person interested may obtain a copy of said regulations prior to the date of adoption by contacting the agency representative named herein.

If the regulatory proposal is adopted, the final statement of reasons may be obtained from the address above when it has been received from the agency program staff.

### **Impact of Regulatory Action/Results of the Economic Impact Assessment**

The potential for significant statewide adverse economic impacts that might result from the proposed regulatory action has been assessed, and the following initial determinations relative to the required statutory categories have been made:

- (a) Significant Statewide Adverse Economic Impact Directly Affecting Business, Including the Ability of California Businesses to Compete with Businesses in Other States:

The proposed action will not have a significant statewide adverse economic impact directly affecting business, including the ability of California businesses to compete with businesses in other states. The proposed regulations are projected to range from minor to no impact on the net revenues to local businesses servicing sport fishermen. If the 2020 KRFC quota is reduced, visitor spending may correspondingly be reduced, and in the absence of alternative visitor activities, the drop in spending could induce some business contraction. If the 2020 KRFC quota remains similar to the KRFC quotas allocated in previous years, then local economic impacts are expected to be unchanged. Neither scenario is expected to directly affect the ability of California businesses to compete with businesses in other states.

- (b) Impact on the Creation or Elimination of Jobs Within the State, the Creation of New Businesses or the Elimination of Existing Businesses, or the Expansion of Businesses in California; Benefits of the Regulation to the Health and Welfare of California Residents, Worker Safety, and the State's Environment:

An estimated 30-50 businesses that serve sport fishing activities are expected to be directly and/or indirectly affected depending on the final KRFC quota. The impacts range from no

impact (Projection 1 under the Economic Impact Assessment (EIA), below) to small adverse impacts (Projection 3, EIA, below).

Depending on the final KRFC quota, the Commission anticipates the potential for some impact on the creation or elimination of jobs in California. The potential adverse employment impacts range from no impact to the loss of 22 jobs. Under all alternatives, due to the limited time period of this regulation's impact, the Commission anticipates no impact on the creation of new businesses, the elimination of existing businesses, or the expansion of businesses in California.

For all of the proposed scenarios, the possibility of growth of businesses to serve alternative recreational activities exists. Adverse impacts to jobs and/or businesses would be less if fishing of other species and grilse KRFC is permitted, than under a complete closure to all fishing. The impacted businesses are generally small businesses employing few individuals and, like all small businesses, are subject to failure for a variety of causes. Additionally, the long-term intent of the proposed regulatory action is to increase sustainability in fishable salmon stocks and, consequently promote the long-term viability of these same small businesses.

The Commission anticipates benefits to the health and welfare of California residents. Providing opportunities for a salmon sport fishery encourages a healthy outdoor activity and the consumption of a nutritious food.

The Commission anticipates benefits to the environment by the sustainable management of California's salmonid resources.

The Commission does not anticipate any benefits to worker safety because the proposed action does not affect working conditions.

(c) Cost Impacts on a Representative Private Person or Business:

The Commission is not aware of any cost impacts that a representative private person or business would necessarily incur in reasonable compliance with the proposed action.

(d) Costs or Savings to State Agencies or Costs/Savings in Federal Funding to the State: None.

(e) Nondiscretionary Costs/Savings to Local Agencies: None.

(f) Programs Mandated on Local Agencies or School Districts: None.

(g) Costs Imposed on any Local Agency or School District that is Required to be Reimbursed Under Part 7 (commencing with Section 17500) of Division 4, Government Code: None.

(h) Effect on Housing Costs: None.

**Effect on Small Business**

It has been determined that the adoption of these regulations may affect small business. The Commission has drafted the regulations in Plain English pursuant to Government Code

Sections 11342.580 and 11346.2(a)(1).

**Consideration of Alternatives**

The Commission must determine that no reasonable alternative considered by the Commission, or that has otherwise been identified and brought to the attention of the Commission, would be more effective in carrying out the purpose for which the action is proposed, would be as effective and less burdensome to affected private persons than the proposed action, or would be more cost effective to affected private persons and equally effective in implementing the statutory policy or other provision of law.

FISH AND GAME COMMISSION

Dated: December 31, 2019

Melissa Miller-Henson  
Executive Director

BDS-11

**Commissioners**  
**Eric Sklar**, President  
Saint Helena  
**Jacque Hostler-Carmesin**, Vice President  
McKinleyville  
**Russell E. Burns**, Member  
Napa  
**Peter S. Silva**, Member  
Jamul  
**Samantha Murray**, Member  
Del Mar

STATE OF CALIFORNIA  
Gavin Newsom, Governor

# Fish and Game Commission



**Melissa Miller-Henson**  
**Executive Director**  
P.O. Box 944209  
Sacramento, CA 94244-2090  
(916) 653-4899  
[fgc@fgc.ca.gov](mailto:fgc@fgc.ca.gov)  
[www.fgc.ca.gov](http://www.fgc.ca.gov)

*Wildlife Heritage and Conservation*  
Since 1870

January 8, 2020

TO ALL INTERESTED AND AFFECTED PARTIES:

This is to provide you with a copy of the notice of proposed regulatory action relative to subsection (b)(91.2) of Section 7.50, Title 14, California Code of Regulations, relating to upper Klamath-Trinity spring Chinook salmon sport fishing, which will be published in the California Regulatory Notice Register on January 10, 2020.

Please note the dates of the public hearings related to this matter and associated deadlines for receipt of written comments. Additional information and associated documents may be found on the Fish and Game Commission website at [www.fgc.ca.gov/Regulations/2020-New-and-Proposed](http://www.fgc.ca.gov/Regulations/2020-New-and-Proposed).

**Wade Sinnen, Senior Environmental Scientist, Department of Fish and Wildlife, has been designated to respond to questions on the substance of the proposed regulations. Mr. Sinnen can be reached at (707) 822-5119, or by email at [Wade.Sinnen@wildlife.ca.gov](mailto:Wade.Sinnen@wildlife.ca.gov).**

Sincerely,

Sherrie Fonbuena  
Associate Governmental Program Analyst

Attachment

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2020 JAN 13 PM 3:10  
BY [Signature]

## **TITLE 14. Fish and Game Commission Notice of Proposed Changes in Regulations**

**NOTICE IS HEREBY GIVEN** that the Fish and Game Commission (Commission), pursuant to the authority vested by sections 200, 205, 265, 270, 315, 316.5, 399 and 2084 of the Fish and Game Code and to implement, interpret or make specific sections 200, 205, 265, 270, 316.5 and 2084 of said Code, proposes to adopt subsection (b)(91.2) of Section 7.50, Title 14, California Code of Regulations, relating to upper Klamath-Trinity spring Chinook salmon sport fishing.

### **Informative Digest/Policy Statement Overview**

Unless otherwise specified, all section references in this document are to Title 14 of the California Code of Regulations.

### **Background**

The Klamath River Basin spring-run Chinook Salmon (*Oncorhynchus tshawytscha*) in-river sport fishery is managed by the Commission via general basin seasons, daily bag limit, and possession limit regulations. Regular creel surveys and tag returns from anglers provide information on the status of spring-run Chinook Salmon in the Klamath River Basin. (Spring Chinook salmon may also be referred to as upper Klamath-Trinity spring Chinook Salmon - UKTSCS, Klamath River Spring Chinook -KRSC, "Klamath Spring Chinook," "Trinity Spring Chinook," or simply "spring-run Chinook".)

In February 2019, the Commission accepted a petition to list UKTSCS, which confers candidacy status. Under the California Endangered Species Act (CESA), take prohibition measures apply (Fish and Game Code Section 2085). The Commission adopted emergency regulations in February 2019 for certain portions of the Klamath and Trinity Rivers to prohibit take and help protect UKTSCS by minimizing confusion by sport anglers who may not have been aware of the CESA candidacy protections. The Commission also received testimony and letters from the public, as well as the Del Norte County and Siskiyou County boards of supervisors that a complete prohibition on take of spring-run Chinook Salmon would create economic harm to businesses. The public requested that the Commission consider shortening the closed periods, or otherwise allow some sport fish take during the spring Chinook Salmon fishing season.

The California Department of Fish and Wildlife (Department) assessed the ability under Section 2084 of the Fish and Game Code to allow for some level of sport fishing take by hook and line, while still providing protective spring-run Chinook Salmon regulatory measures. On April 17, 2019, the Commission adopted emergency regulations to mitigate the potential adverse economic and fiscal impacts of a complete prohibition of take. The emergency regulations, which went into effect June 26, 2019, allow limited sport fishing take of spring-run Chinook Salmon on the Klamath River downstream of the Highway 96 bridge at Weitchpec between July 1 and August 14, and the Trinity River from the Old Lewiston Bridge to the mouth of the South Fork Trinity River, and the New River main stem downstream of the confluence of the East Fork to the confluence with the Trinity River between July 1 and August 31.

## **Regulatory Proposal**

This proposed rulemaking will make permanent the June 2019 emergency regulations allowing limited sport fish take of UKTSCS in most of the same reaches. The proposed regulation would allow continued limited sport fishing take of UKTSCS on the Klamath River downstream of the Highway 96 bridge at Weitchpec between July 1 and August 14, and the Trinity River from the Old Lewiston Bridge to the mouth of the South Fork Trinity River between July 1 and August 31, with a bag limit of one Chinook Salmon and a possession limit of two Chinook Salmon, after which fall season regulations under subsection (b)(91.1) of Section 7.50 will apply. This proposed rulemaking does not make permanent the language for the New River reach (main stem downstream of the confluence of the East Fork to the confluence with the Trinity River between July 1 and August 31).

## **Benefits of the Proposed Regulations**

Compared to the full closure under CESA, the proposed regulations provide increased recreational fishing opportunity for a July 1 start during the peak of the season, and through August 14 (Klamath River – six weeks) or August 31 (Trinity River – eight weeks). The July 1 opening date in the lower Klamath River protects the majority of wild-origin UKTSCS which enter and migrate through the lower Klamath River by reducing the spring Chinook Salmon fishing season by six months (opening July 1 instead of January 1). These wild salmon are destined for spawning in the upper Salmon River and upper South Fork Trinity River. Similarly, the July 1 opening date on the upper Trinity River protects wild UKTSCS by reducing the fishing season by six months.

Making permanent this six to eight-week window reduces potential economic impacts and helps mitigate the risk of hardship to local businesses and communities from a full closure to fishing under CESA, while protecting UKTSCS during its migratory and spawning phases. Allowing limited take at the end of the traditional spring season for sport fish by hook and line of UKTSCS is consistent with Fish and Game Code Section 2084.

## **Consistency and Compatibility with Existing Regulations**

Article IV, Section 20 of the State Constitution specifies that the Legislature may delegate to the Commission such powers relating to the protection and propagation of fish and game as the Legislature sees fit. The Legislature has delegated authority to the Commission to authorize the taking of any fish by hook and line for sport that is listed as an endangered, threatened, or candidate species (Section 2084, Fish and Game Code). The Commission has reviewed its own regulations and finds that the proposed regulations are neither inconsistent nor incompatible with existing State regulations. Commission staff has searched the California Code of Regulations and has found no other State regulations related to spring Chinook Salmon sport fishing in the Klamath River Basin.

## **Scheduled Hearings**

**NOTICE IS GIVEN** that any person interested may present statements, orally or in writing, relevant to this action at a hearing to be held in the Natural Resources Building Auditorium, 1416 Ninth Street, Sacramento, California, 95814, on Friday, February 21, 2020, at 8:30 a.m., or as soon thereafter as the matter may be heard.

**NOTICE IS ALSO GIVEN** that any person interested may present statements, orally or in writing, relevant to this action at a hearing to be held in the Natural Resources Building Auditorium, 1416 Ninth Street, Sacramento, California, 95814, on Thursday, April 16, 2020, at 8:30 a.m., or as soon thereafter as the matter may be heard. It is requested, but not required, that written comments be submitted on or before on April 2, 2020, at the address given below, or by email to [FGC@fgc.ca.gov](mailto:FGC@fgc.ca.gov). Written comments mailed, or emailed to the Commission office, must be received before 12:00 noon on April 10, 2020. All comments must be received no later than April 16, 2020, at the hearing in Sacramento, California. If you would like copies of any modifications to this proposal, please include your name and mailing address. Mailed comments should be addressed to Fish and Game Commission, PO Box 944209, Sacramento, CA 94244-2090.

### **Availability of Documents**

Copies of the Notice of Proposed Action, the Initial Statement of Reasons, and the text of the regulation in underline and strikeout format can be accessed through the Commission website at [www.fgc.ca.gov](http://www.fgc.ca.gov). The regulations as well as all related documents upon which the proposal is based (rulemaking file), are on file and available for public review from the agency representative, Melissa Miller-Henson, Executive Director, Fish and Game Commission, 1416 Ninth Street, PO Box 944209, Sacramento, California 94244-2090, phone (916) 653-4899. Please direct requests for the above-mentioned documents and inquiries concerning the regulatory process to Melissa Miller-Henson or Sherrie Fonbuena at the preceding address or phone number. **Wade Sinnen, Senior Environmental Scientist, Department of Fish and Wildlife, (707) 822-5119 or [Wade.Sinnen@wildlife.ca.gov](mailto:Wade.Sinnen@wildlife.ca.gov), has been designated to respond to questions on the substance of the proposed regulations.**

### **Availability of Modified Text**

If the regulations adopted by the Commission differ from but are sufficiently related to the action proposed, they will be available to the public for at least 15 days prior to the date of adoption. Circumstances beyond the control of the Commission (e.g., timing of Federal regulation adoption, timing of resource data collection, timelines do not allow, etc.) or changes made to be responsive to public recommendation and comments during the regulatory process may preclude full compliance with the 15-day comment period, and the Commission will exercise its powers under Section 265 of the Fish and Game Code. Regulations adopted pursuant to this section are not subject to the time periods for adoption, amendment or repeal of regulations prescribed in Sections 11343.4, 11346.4, 11346.8 and 11347.1 of the Government Code. Any person interested may obtain a copy of said regulations prior to the date of adoption by contacting the agency representative named herein.

If the regulatory proposal is adopted, the final statement of reasons may be obtained from the address above when it has been received from the agency program staff.

### **Impact of Regulatory Action/Results of the Economic Impact Assessment**

The potential for significant statewide adverse economic impacts that might result from the proposed regulatory action has been assessed, and the following initial determinations relative to the required statutory categories have been made:

- (a) Significant Statewide Adverse Economic Impact Directly Affecting Business, Including the Ability of California Businesses to Compete with Businesses in Other States:

The proposed action will not have a significant statewide adverse economic impact directly affecting business, including the ability of California businesses to compete with businesses in other states. Making permanent the June 2019 emergency regulations via the certificate of compliance process would both create permanent incentives for more tourists to travel to coastal northern California, and help stimulate the local economies in Del Norte, Siskiyou, Trinity and neighboring counties.

- (b) Impact on the Creation or Elimination of Jobs Within the State, the Creation of New Businesses or the Elimination of Existing Businesses, or the Expansion of Businesses in California; Benefits of the Regulation to the Health and Welfare of California Residents, Worker Safety, and the State's Environment:

The Commission does not anticipate any significant impact on the creation or elimination of jobs, the creation of new business, the elimination of existing businesses, or the expansion of businesses in California. This is due to the re-opening of limited sport fishing take during the peak of the season, starting July 1, and through August 14 (Klamath River) or August 31 (Trinity River). Compared to the full closure under CESA, the proposed regulation provides increased recreational fishing opportunity for the six to eight-week window between July and August in the Klamath River Basin.

The Commission anticipates benefits to the health and welfare of California residents through the activity of fishing for salmon. The Commission does not anticipate any benefits to worker safety because the proposed regulation will not affect existing working conditions. The Commission anticipates a neutral impact to the state's environment, as the majority of fish present in the river reaches during the limited six- or eight-week windows are believed to be of hatchery origin.

- (c) Cost Impacts on a Representative Private Person or Business:

The Commission is not aware of any cost impacts that a representative private person or business would necessarily incur in reasonable compliance with the proposed action.

- (d) Costs or Savings to State Agencies or Costs/Savings in Federal Funding to the State: None.

- (e) Nondiscretionary Costs/Savings to Local Agencies: None.

- (f) Programs Mandated on Local Agencies or School Districts: None.

- (g) Costs Imposed on any Local Agency or School District that is Required to be Reimbursed Under Part 7 (commencing with Section 17500) of Division 4, Government Code: None.

- (h) Effect on Housing Costs: None.

### **Effect on Small Business**

It has been determined that the adoption of these regulations may affect small business. The

Commission has drafted the regulations in Plain English pursuant to Government Code Sections 11342.580 and 11346.2(a)(1).

### **Consideration of Alternatives**

The Commission must determine that no reasonable alternative considered by the Commission, or that has otherwise been identified and brought to the attention of the Commission, would be more effective in carrying out the purpose for which the action is proposed, would be as effective and less burdensome to affected private persons than the proposed action, or would be more cost effective to affected private persons and equally effective in implementing the statutory policy or other provision of law.

FISH AND GAME COMMISSION

Dated: December 31, 2019

Melissa Miller-Henson  
Executive Director

BOS-11

**Commissioners**  
Eric Sklar, President  
Saint Helena

Jacque Hostler-Carmesin, Vice President  
McKinleyville

Russell E. Burns, Member  
Napa

Peter S. Silva, Member  
Jamul

Samantha Murray, Member  
Del Mar

STATE OF CALIFORNIA  
Gavin Newsom, Governor

## Fish and Game Commission



Melissa Miller-Henson  
Executive Director  
P.O. Box 944209  
Sacramento, CA 94244-2090  
(916) 653-4899  
[fgc@fgc.ca.gov](mailto:fgc@fgc.ca.gov)  
[www.fgc.ca.gov](http://www.fgc.ca.gov)

*Wildlife Heritage and Conservation*  
Since 1870

January 10, 2020

TO ALL INTERESTED AND AFFECTED PARTIES:

This is to provide you with a copy of the notice of proposed regulatory action relative to sections 2.35 and 7.00, and subsections (b)(5), (b)(68), (b)(124), and (b)(156.5) of Section 7.50, Title 14, California Code of Regulations, relating to Central Valley sport fishing regulations, which will be published in the California Regulatory Notice Register on January 10, 2020.

Please note the dates of the public hearings related to this matter and associated deadlines for receipt of written comments. Additional information and associated documents may be found on the Fish and Game Commission website at [www.fgc.ca.gov/Regulations/2020-New-and-Proposed](http://www.fgc.ca.gov/Regulations/2020-New-and-Proposed).

**Karen Mitchell, Senior Environmental Scientist, Department of Fish and Wildlife, has been designated to respond to questions on the substance of the proposed regulations. Ms. Mitchell can be reached by telephone at (916) 445-0826 or by email at [Karen.Mitchell@wildlife.ca.gov](mailto:Karen.Mitchell@wildlife.ca.gov).**

Sincerely,

Craig Castleton  
Associate Governmental Program Analyst

Attachment

RECEIVED  
BOARD OF SUPERVISORS  
SAN FRANCISCO  
2020 JAN 13 PM 3:10

## **TITLE 14. Fish and Game Commission Notice of Proposed Changes in Regulations**

**NOTICE IS HEREBY GIVEN** that the Fish and Game Commission (Commission), pursuant to the authority vested by Sections 200, 205, 265, 270, 275, 315, 316.5, 399, and 2084 of the Fish and Game Code and to implement, interpret or make specific Sections 200, 205, 255, 265, 270, 275, 316.5, and 2084 of said Code, proposes to amend Sections 2.35 and 7.00, and subsections (b)(5), (b)(68), (b)(124), and (b)(156.5) of Section 7.50, Title 14, California Code of Regulations, relating to Central Valley sport fishing regulations.

### **Informative Digest/Policy Statement Overview**

Unless otherwise specified, all section references in this document are to Title 14 of the California Code of Regulations.

Current regulations in subsections (b)(5), (b)(68), (b)(124), and (b)(156.5) of Section 7.50 prescribe the 2019 seasons and daily bag and possession limits for Sacramento River fall-run Chinook Salmon (*Oncorhynchus tshawytscha*; SRFC) sport fishing in the American, Feather, Mokelumne, and Sacramento rivers, respectively. Collectively, these four rivers constitute the "Central Valley fishery" for SRFC for purposes of this document. Each year, the Department of Fish and Wildlife (Department) recommends new Chinook Salmon bag and possession limits for consideration by the Fish and Game Commission (Commission) to align the fishing limits with up-to-date management goals, as set forth below.

The Pacific Fishery Management Council (PFMC) is responsible for adopting recommendations for the management of recreational and commercial ocean salmon fisheries in the Exclusive Economic Zone (three to 200 miles offshore) off the coasts of Washington, Oregon, and California. When approved by the Secretary of Commerce, these recommendations are implemented as ocean salmon fishing regulations by the National Marine Fisheries Service (NMFS).

The PFMC will develop the annual Pacific coast ocean salmon fisheries regulatory options for public review at its March 2020 meeting and will adopt its final regulatory recommendations at its April 2020 meeting based on the PFMC salmon abundance estimates and recommendations for ocean harvest for the coming season. Based on the April 2020 recommendation by PFMC, the Department will recommend specific bag and possession limit regulations to the Commission at its April 16, 2020 meeting. The Commission will then consider adoption of the Central Valley sport fishing regulations at its May 14, 2020 teleconference.

### **Proposed Regulations**

#### **CHINOOK SALMON BAG AND POSSESSION LIMITS**

The Department recognizes the uncertainty of SRFC in-river harvest projections. Therefore, for the 2020 Central Valley fishery, the Department is presenting three regulatory options for the Commission's consideration to tailor 2020 Central Valley fishery management to target 2020 in-river fisheries harvest projections.

- Option 1 is the most liberal of the three options, and allows take of any size Chinook Salmon up to the daily bag and possession limits.

- Option 2 allows for take of a limited number of adult (age three to five) Chinook Salmon, with grilse (age two) Chinook Salmon making up the remainder of the daily bag and possession limits.
- Option 3 is the most conservative option, and allows for a grilse-only Chinook Salmon fishery.

All three options will also increase fishing opportunities on Chinook Salmon by extending the Chinook Salmon sport fishing season on the Sacramento River from the Deschutes Road bridge to the Red Bluff Diversion Dam from a closure date of December 16 to a closure date of December 31.

A minor correction will also be made to subsections 7.50(b)(124)(A), (B), and (D), to ensure consistency in the format in which the daily bag and possession limit for hatchery trout or hatchery steelhead is displayed in the regulatory text.

All options would be applicable to the following river segments and time periods:

American River, subsection 7.50(b)(5):

- (B) From the USGS gauging station cable crossing near Nimbus Hatchery to the SMUD power line crossing the southwest boundary of Ancil Hoffman Park, July 16 through October 31
- (C) From the SMUD power line crossing at the southwest boundary of Ancil Hoffman Park to the Jibboom Street bridge, July 16 through December 31
- (D) From the Jibboom Street bridge to the mouth, July 16 through December 16

Feather River, subsection 7.50(b)(68):

- (D) From the unimproved boat ramp above the Thermalito Afterbay Outfall to 200 yards above the Live Oak boat ramp, July 16 through October 31
- (E) From 200 yards above the Live Oak boat ramp to the mouth, July 16 through December 16

Mokelumne River, subsection 7.50(b)(124):

- (A) From Comanche Dam to Elliott Road, July 16 through October 15
- (B) From Elliott Road to the Woodbridge Irrigation District Dam and including Lodi Lake, July 16 through December 31
- (D) From the Lower Sacramento Road bridge to the mouth, July 16 through December 16

Sacramento River below Keswick Dam, subsection 7.50(b)(156.5):

- (B) From Deschutes Road bridge to the Red Bluff Diversion Dam, August 1 through December 31

- (C) From the Red Bluff Diversion Dam to the Highway 113 bridge, July 16 through December 16
- (D) From the Highway 113 bridge to the Carquinez Bridge, July 16 through December 16.

The following options are provided for Commission consideration:

**Option 1 – Any Size Chinook Salmon Fishery**

This option is the Department's preferred option if the 2019 SRFC stock abundance forecast is sufficiently high to avoid the need to constrain inland SRFC harvest.

Bag limit of [0-4] Chinook Salmon.

Possession limit - [0-12] Chinook Salmon.

**Option 2 – Limited Adult and Grilse Salmon Fishery**

Bag limit of [0-4] Chinook Salmon of which no more than [0-4] fish over 27 inches total length may be retained.

Possession limit - [0-12] Chinook Salmon of which no more than [0-4] fish may be over 27 inches total length.

**Option 3 – Grilse Salmon Fishery Only**

Bag limit of [0-4] Chinook Salmon less than or equal to 27 inches total length.

Possession limit - [0-12] Chinook Salmon less than or equal to 27 inches total length.

**EXTEND CHINOOK SALMON SPORT FISHING SEASON ON THE SACRAMENTO RIVER**

Sport fishing interests have requested the Chinook Salmon sport fishing season on the Sacramento River be extended from the current December 16 closure date to December 31 to enhance late-season fishing opportunity on the river. At issue is regulating the closure date to minimize contact in the fishery with federally and state-listed as endangered winter-run Chinook Salmon.

The Department supports extending the fishing season from December 16 to December 31 upstream of the Red Bluff Diversion Dam (River Mile (RM) 243), which will provide late season fishing for late-fall-run Chinook Salmon without negatively impacting winter-run Chinook Salmon.

**Proposal: Amend subsection 7.50(b)(156.5)(C), Sacramento River**

Extend the Chinook Salmon sport fishing season on the Sacramento River from the Deschutes Road bridge to the Red Bluff Diversion Dam to December 31.

**REMOVE EXCEPTION FOR TAKE OF COHO SALMON IN THE FEATHER RIVER**

Section 7.00 includes an exception for the take of Coho Salmon in Lake Oroville and Oroville-

Thermalito Complex, and the Feather River from the Diversion Pool Dam to the Fish Barrier Dam. Section 7.00 also includes an exception for incidentally hooked Coho Salmon in the same area. Coho Salmon have not been stocked in Lake Oroville since 2013. Coho Salmon are no longer planted in the Feather River water impoundments. Therefore, the exceptions for take and incidentally hooked Coho Salmon stated in Section 7.00 should be removed.

**Proposal: Amend Section 7.00, Re: Take of Coho Salmon in the Feather River**

Remove exception for take and incidentally hooked Coho Salmon in Lake Oroville and Oroville-Thermalito Complex, and the Feather River from the Diversion Pool Dam to the Fish Barrier Dam.

**PROHIBIT FISHING AT CONCRETE FLOOD CONTROL WEIRS**

Annually, during the rainy season, fish often get trapped below the concrete flood control weirs on the Sacramento River. Fish trapped in these areas are often state or federally-listed as endangered or threatened species and, therefore, should not be exposed to angling opportunity. Subsections 7.50(b)(156.5)(D) and (E) include a "Note" which states that it is unlawful to take fish 0-250 feet downstream from the overflow side of the Moulton, Colusa, Tisdale, Fremont, and Sacramento weirs. However, there is no regulation in place that makes angling near flood control weirs unlawful. Section 2.35 prohibits angling near fishways and egg-taking stations, dams, weirs or racks with fishways or egg-taking stations, and the upstream side of fish screens; but does not apply to areas, except for Fremont Weir, described in the notes in subsections 7.50(b)(156.5)(D) and (E).

**Proposal 1: Amend Section 2.35, Regarding Take of Fish at Weirs**

Amend Section 2.35 to include and differentiate flood control weirs in the Central Valley from other types of weirs and include a fishing closure of 0-250 feet downstream from the overflow side of Moulton, Tisdale, Fremont, and Sacramento weirs.

**Proposal 2: Amend subsections 7.50(b)(156.5)(D) and (E), Sacramento River**

Remove Note which states it is unlawful to take fish 0-250 feet downstream from the overflow side of the Moulton, Colusa, Tisdale, Fremont, and Sacramento weirs. These fishing closures will now be stipulated in Title 14, Section 2.35, with the exception of the Colusa Weir.

**Benefits of the Proposed Regulations**

The Commission anticipates benefits to the environment in the sustainable management of Central Valley Chinook Salmon resources. Other benefits of the proposed regulations are consistency with federal fishery management goals, health and welfare of California residents, and promotion of businesses that rely on Central Valley Chinook Salmon sport fishing.

**Consistency and Compatibility with Existing Regulations**

Article IV, Section 20 of the State Constitution specifies that the Legislature may delegate to the Fish and Game Commission such powers relating to the protection and propagation of fish and game as the Legislature sees fit. The Legislature has delegated to the Commission the power to regulate recreational fishing in waters of the state (Fish and Game Code sections 200, 205, 315 and 316.5).

The Commission has reviewed its own regulations and finds that the proposed regulations are neither inconsistent nor incompatible with existing state regulations. The Commission has searched the California Code of Regulations and finds no other state agency regulations pertaining to Chinook Salmon recreational fishing seasons, bag, and possession limits for Central Valley sport fishing.

**NOTICE IS GIVEN** that any person interested may present statements, orally or in writing, relevant to this action at a hearing to be held in the California Natural Resources Building Auditorium, 1416 Ninth Street, Sacramento, California, 95814 on Friday, February 21, 2020 at 8:30 a.m., or as soon thereafter as the matter may be heard.

**NOTICE IS ALSO GIVEN** that any person interested may present statements, orally or in writing, relevant to this action at a hearing to be held in the California Natural Resources Building Auditorium, 1416 Ninth Street, Sacramento, California, 95814 on Thursday, April 16, 2020 at 8:30 a.m., or as soon thereafter as the matter may be heard.

**NOTICE IS ALSO GIVEN** that any person interested may present statements, orally or in writing, relevant to this action at a teleconference hearing originating in the Commission's conference room, 1416 Ninth Street, Suite 1320, Sacramento, California, 95814, on Thursday, May 14, 2020, at 8:30 a.m., or as soon thereafter as the matter may be heard. It is requested, but not required, that written comments be submitted on or before Friday, May 1, 2020 at the address given below, or by email to [FGC@fgc.ca.gov](mailto:FGC@fgc.ca.gov). Written comments mailed, or emailed to the Commission office, must be received before 12:00 noon on Monday, May 11, 2020. All comments must be received no later than Thursday, May 14, 2020, at the teleconference hearing. If you would like copies of any modifications to this proposal, please include your name and mailing address. Mailed comments should be addressed to Fish and Game Commission, PO Box 944209, Sacramento, CA 94244-2090.

### **Availability of Documents**

Copies of the Notice of Proposed Action, the Initial Statement of Reasons, and the text of the regulation in underline and strikethrough format can be accessed through the Commission website at [www.fgc.ca.gov](http://www.fgc.ca.gov). The regulations as well as all related documents upon which the proposal is based (rulemaking file), are on file and available for public review from the agency representative, Melissa Miller-Henson, Executive Director, Fish and Game Commission, 1416 Ninth Street, Box 944209, Sacramento, California 94244-2090, phone (916) 653-4899. Please direct requests for the above mentioned documents and inquiries concerning the regulatory process to Melissa Miller-Henson or Craig Castleton at the preceding address or phone number. **Karen Mitchell, Senior Environmental Scientist, Department of Fish and Wildlife, (916) 445-0826 or [Karen.Mitchell@wildlife.ca.gov](mailto:Karen.Mitchell@wildlife.ca.gov), has been designated to respond to questions on the substance of the proposed regulations.**

### **Availability of Modified Text**

If the regulations adopted by the Commission differ from but are sufficiently related to the action proposed, they will be available to the public for at least 15 days prior to the date of adoption. Circumstances beyond the control of the Commission (e.g., timing of Federal regulation adoption, timing of resource data collection, timelines do not allow, etc.) or changes made to be responsive to public recommendation and comments during the regulatory process may preclude full compliance with the 15-day comment period, and the Commission will exercise its powers under Section 265 of the Fish and Game Code. Regulations adopted pursuant to this section are not subject to the time

periods for adoption, amendment or repeal of regulations prescribed in Sections 11343.4, 11346.4, 11346.8 and 11347.1 of the Government Code. Any person interested may obtain a copy of said regulations prior to the date of adoption by contacting the agency representative named herein.

If the regulatory proposal is adopted, the final statement of reasons may be obtained from the address above when it has been received from the agency program staff.

### **Impact of Regulatory Action/Results of the Economic Impact Assessment**

The potential for significant statewide adverse economic impacts that might result from the proposed regulatory action has been assessed, and the following initial determinations relative to the required statutory categories have been made:

(a) **Significant Statewide Adverse Economic Impact Directly Affecting Business, Including the Ability of California Businesses to Compete with Businesses in Other States:**

The proposed action will not have a significant statewide adverse economic impact directly affecting business, including the ability of California businesses to compete with businesses in other states. The proposed changes are necessary for the continued preservation of the resource, while providing inland sport fishing opportunities and thus, the prevention of adverse economic impacts.

(b) **Impact on the Creation or Elimination of Jobs Within the State, the Creation of New Businesses or the Elimination of Existing Businesses, or the Expansion of Businesses in California; Benefits of the Regulation to the Health and Welfare of California Residents, Worker Safety, and the State's Environment:**

The Commission does not anticipate significant adverse economic impacts but acknowledges the potential for short-term negative impacts on the creation or elimination of jobs within the state. The Commission anticipates no adverse impacts on the creation of new business, the elimination of existing businesses or the expansion of businesses in California (see Table 2). Minor variations in the bag and possession limits and/or the implementation of a size limit are unlikely to significantly impact the volume of business activity. The loss of up to 27 jobs with Option 3 is not expected to eliminate businesses because reduced fishing days will be partially offset by the extension of the salmon fishing season by two weeks on a portion of the Sacramento River from the Deschutes Road bridge to the Red Bluff Diversion Dam, and by opportunities to fish for grilse Chinook Salmon and other species.

The Commission anticipates benefits to the health and welfare of California residents. Providing opportunities for a Chinook Salmon sport fishery encourages consumption of a nutritious food. The Commission anticipates benefits to the environment by the sustainable management of Chinook Salmon resources in the Central Valley.

The Commission does not anticipate any benefits to worker safety.

Other benefits of the proposed regulations are concurrence with federal fishery management goals and promotion of businesses that rely on Central Valley sport fishing.

(c) **Cost Impacts on a Representative Private Person or Business:**

The Commission is not aware of any cost impacts that a representative private person or business would necessarily incur in reasonable compliance with the proposed action.

- (d) Costs or Savings to State Agencies or Costs/Savings in Federal Funding to the State: None.
- (e) Nondiscretionary Costs/Savings to Local Agencies: None.
- (f) Programs Mandated on Local Agencies or School Districts: None.
- (g) Costs Imposed on any Local Agency or School District that is Required to be Reimbursed Under Part 7 (commencing with Section 17500) of Division 4, Government Code: None.
- (h) Effect on Housing Costs: None.

### **Effect on Small Business**

It has been determined that the adoption of these regulations may affect small business. The Commission has drafted the regulations in Plain English pursuant to Government Code Sections 11342.580 and 11346.2(a)(1).

### **Consideration of Alternatives**

The Commission must determine that no reasonable alternative considered by the Commission, or that has otherwise been identified and brought to the attention of the Commission, would be more effective in carrying out the purpose for which the action is proposed, would be as effective and less burdensome to affected private persons than the proposed action, or would be more cost effective to affected private persons and equally effective in implementing the statutory policy or other provision of law.

FISH AND GAME COMMISSION

Dated: December 31, 2019

Melissa Miller-Henson  
Executive Director

**From:** [Board of Supervisors, \(BOS\)](#)  
**To:** [BOS-Supervisors](#)  
**Cc:** [Somera, Alisa \(BOS\)](#)  
**Subject:** FW: File No. 190808 - Emergency Declaration - 1235 Mission Street - RESPONSE  
**Date:** Wednesday, January 8, 2020 2:05:00 PM  
**Attachments:** [image001.png](#)  
[Emergency Declaration Response FILE 190808.pdf](#)

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**From:** Walsh, Robert (HSA) <robert.walsh@sfgov.org>  
**Sent:** Tuesday, December 31, 2019 2:01 PM  
**To:** Wong, Linda (BOS) <linda.wong@sfgov.org>; Board of Supervisors, (BOS) <board.of.supervisors@sfgov.org>  
**Cc:** Campbell, Severin (BUD) <severin.campbell@sfgov.org>; Menard, Nicolas (BUD) <nicolas.menard@sfgov.org>; Spitz, Jeremy (DPW) <Jeremy.Spitz@sfdpw.org>  
**Subject:** File No. 190808 - Emergency Declaration - 1235 Mission Street - RESPONSE

Hello Linda et al,

Attached is the response to File 190808 (1235 Mission HVAC emergency declaration).

Please let me know if you have any questions.

Happy New year!

-Robert

**Robert "R.E." Walsh** | Director of Operations  
Human Services Agency | City and County of San Francisco  
Phone: 415-557-5644



# City and County of San Francisco



**London Breed, Mayor**

# Human Services Agency

Department of Human Services  
Department of Disability and Aging Services  
Office of Early Care and Education

**Trent Rhorer, Executive Director**

San Francisco Board of Supervisors  
1 Dr. Carlton B. Goodlett Place, City Hall, Room 244  
San Francisco, CA 94102-4689  
Phone: 415.554.7719 | Fax: (415) 554-5163  
E-mail: [Board.of.Supervisors@sfgov.org](mailto:Board.of.Supervisors@sfgov.org)

Dear Honorable Members of the San Francisco Board of Supervisors,

On October 23, 2019, the Board approved the emergency declaration for the HVAC system at 1235 Mission Street, which included a request for reporting on the below items (File 19-0808). This letter includes the information requested.

File No. 19-0808

*FURTHER RESOLVED, That the Board of Supervisors requests a report from the Human Services Agency no later than January 2, 2020 on (a) upgrades to building systems performed at 1235 Mission Street under the terms of the 2014 lease, including City and SFUSD costs for these upgrades, (b) other potentially necessary upgrades and associated costs for the electrical, plumbing, and other systems during the term of the lease, (c) building inspection protocols and building inspections made prior to entering into the 2014 lease including anticipated costs, and (d) an itemized account \$6 million spent on tenant improvements under the 2014 lease.*

As of December 2019, work performed by SFUSD under the 2014 lease includes:

1. Replacement of handrails with ADA compliant handrails, in east and west stairwells.
  - a. Cost: \$200,000
2. Roof resurfacing and restoration.
  - a. Cost: \$806,000
3. Water proofing repairs – sidewalk and roof.
  - a. Cost: \$30,000

Repairs in progress:

4. Fire and life safety system
  - a. Cost: \$750,000
5. Elevator #3 overhaul
  - a. Cost: \$250,000

- Subtotal of work completed and in progress: \$2,036,000
- Soft costs (project management, architectural, consulting): \$1,067,240
- Total: \$3,103,240
- Contingency available (estimated): \$396,760

As of December 2019, work performed by SFHSA under the 2014 lease includes:

1. Lobby remodel
  - a. Cost: \$1,300,000
2. ADA
  - a. Cost: \$52,243
3. Electrical
  - a. Cost: \$195,405
4. HVAC
  - a. Cost: \$65,773
5. Interior (basement, distribution, and interview area remodel)
  - a. Cost: \$682,713
6. Plumbing
  - a. Cost: \$49,858

Work in progress:

7. HVAC - chiller and supply fan replacement
  - a. Cost: \$1,013,548
8. Elevator #1 replacement
  - a. Cost: \$475,000
9. Interior – 4<sup>th</sup> floor remodel
  - a. Cost: \$650,000

Grand total of SFHSA work completed and in progress: \$4,484,541

Other potential upgrades, necessary to operation of the building include:

1. Elevator #2 & #4 replacement
  - a. Estimated cost: \$978,500
2. Window replacement and thermal/moisture protection
  - a. Estimated cost: \$412,844

The remaining SFUSD contingency (~\$396,000) will be used to replace windows and improve the building's thermal performance. The work will be conducted by SFHSA and Public Works. The remaining items related to elevators will be addressed in the capital planning process, or during the lease renewal process with SFUSD.

Documents related to building inspection protocols and building inspections made prior to the 2014 lease were not found. However, language in the lease agreement focuses on the aforementioned work, but the pricing to perform such work is insufficient. To mitigate the risk of this happening in the future, SFHSA will require a Capital Needs Assessment (CNA) by a third party to identify the building systems in need of attention and the costs of capital needs over the term of the lease agreement.

Attached is an itemized accounting of dollars expensed by SFUSD (Appendix A) and SFHSA (Appendix B), respectively.

Should you have any questions or concerns, please do not hesitate to contact me.

Sincerely,



12-31-19

Robert "R.E." Walsh  
Director of Facilities and Operations  
Human Services Agency  
City and County of San Francisco

DATE

ATTACHMENTS: Appendix A, Appendix B, Appendix B-1, Appendix B-2

CC: Severin Campbell (BUD), Jeremy Spitz (DPW), Trent Rhorer (HSA)

# Appendix A

## 1235 MISSION STREET PROJECT SUMMARY REPORT

PROJECT START: JULY 01, 2014  
 PROJECT STATUS AS OF: February 28, 2019 SFUSD Financial Reporting  
 PROJECT -- 11860

COST TYPE	SCOPE	VENDOR NAME	LEASE REQ'T		% OF TOTAL		NOTES
			CURRENT CONTRACT EST	TOTAL PAID	% PAID OUT	TOTAL FORECAST AS OF 12/31/18	
	SFUSD		\$ 3,500,000		58%		
	SFHSA		\$ 2,500,000		42%		
			\$ 6,000,000		100%		
			\$ 1,000,000				Per lease of 7/1/14
			\$ 1,500,000				Per accommodation with SFHSA
			\$ 3,500,000				Available funds for building improvements
<b>HARD COSTS</b>							
	SCOPE 1 - STAIRWELLS	Pionic	\$193,800	\$184,110	95%	\$200,000	(\$6,200) CO for add painting pending
	SCOPE 2 - BLDG 2 ROOF	Andy's Roofing Company Inc.	\$306,529	\$270,071	88%	\$336,529	(\$30,000) Work 98% complete
	SCOPE 3 - BLDG 1 & 3 ROOFS	Andy's Roofing Company Inc.	\$469,463	\$436,179	93%	\$470,000	(\$537) Work 98% complete
	SCOPE 3.1 - ROOF & SIDEWALK PREVENT. MAINT.	Pioneer	\$45,000	\$29,054	65%	\$30,000	\$15,000 Work 100% complete
	SCOPE 4 - FIRE-ALIVE SAFETY SYSTEM	TBD	\$750,000	\$0	0%	\$750,000	\$0 JCI bidg audit 100% complete
	SCOPE 5 - ELEVATORS	TBD	\$250,000	\$0	0%	\$250,000	\$0 Eie #2 proposal @ \$140,000
	<b>HARD COST SUBTOTAL</b>		<b>\$2,014,792</b>	<b>\$919,414</b>	<b>45.6%</b>	<b>\$2,036,529</b>	<b>(\$21,737)</b>
<b>SOFT COSTS</b>							
	ARCHITECTURE+ENGINEERING	William Duff Architects	\$783,930	\$747,980	95%	\$795,000	(\$11,070) Includes JCI FA design
	PROJECT MANAGEMENT + ASSET ADVISOR	David Gould & Associates	\$174,000	\$153,475	88%	\$185,000	(\$11,000)
	ALTA CIVIL ENGINEER	Slooten Consulting Inc	\$3,400	\$3,400	100%	\$3,400	\$0 Complete no new work
	HVAC CONSULTANT	Gayner Engineers Inc	\$34,800	\$24,040	69%	\$19,840	\$14,960 Complete no new work
	ELECTRICAL CONSULTANT	Paganini Electric Corp	\$45,865	\$45,865	100%	\$45,865	\$0 Complete no new work
	HAZMAT CONSULTANT	Millennium Consulting Services	\$19,995	\$35,893	180%	\$50,000	(\$30,005) Add work for scope 4
	DOCUMENT PRINTING SERVICES	ARC	\$5,000	\$5,633	113%	\$7,500	(\$2,500)
	DELIVERY SERVICES	ON TRAC	\$250	\$33	13%	\$250	\$0
	<b>SOFT COST SUBTOTAL</b>		<b>\$1,067,240</b>	<b>\$1,016,319</b>	<b>95%</b>	<b>\$1,106,855</b>	<b>(\$39,615)</b>
<b>TOTAL PROJECT SOFT AND HARD COST PLAN</b>							
	RESERVE-CONTINGENCY FUNDS (NET CAPEX FUNDS - TOTAL CONTRACT)		\$3,082,032	\$1,935,733	63%	\$3,143,384	(\$61,352)
	FORECAST RESIDUAL FUNDS (NET CAPEX FUNDS - TOTAL FORECAST)				10%	\$356,616	
Project # 11860							

## Appendix B

Breakdown of work performed at 1235 Mission Street by DPW Bureau of Building Repair (BBR) for Human Services Agency (HSA)

Project	SO	SO_Desc	Total Cost	Created Date	SUMMARY
ADA	998911	HSA 1235 Mission St. Bathroom/Hallway door ADA upgrade	\$16,507.81	9/26/2018	ADA \$52,243.36
ADA	912961	HSA - Handicap Door for 1235 Mission PAES Client Entrance	\$6,602.37	5/10/2018	Electrical \$195,405.06
ADA	806903	HSA - ADA signs and Electrical Permits for 1235 Mission - Basement	\$12,702.76	10/24/2017	HVAC \$65,773.89
ADA	684107	HSA- ADA Upgrade Employee Entrance Doors on Mission St.	\$16,430.42	3/9/2017	Interior \$682,713.06
Electrical	918918	HSA: Electrical work for 1235	\$21,307.81	5/21/2018	Plumbing \$49,858.42
Electrical	913470	HSA: Electrical work for 1235	\$36,531.23	5/11/2018	
Electrical	856837	HSA: 1235 Mission: add resistors to Dim LED Basement lights	\$26,467.25	1/30/2018	
Electrical	835364	HSA - Emergency Lights for whole building	\$84,900.88	12/19/2017	
Electrical	817807	HSA: 1235-B Install 1 new 20amp breaker and Sea. 20amp breaker for spare	\$2,533.74	11/14/2017	
Electrical	812168	HSA - Inspect and repair the Emergency Overhead Lights throughout the building	\$4,583.42	11/3/2017	
Electrical	800136	HSA: AC Outlets in Telecom Rooms	\$8,547.19	10/12/2017	
Electrical	796640	HSA: 1235 Mission: Clean Up Existing Electrical	\$10,533.54	10/5/2017	
HVAC	837051	HSA: Run additional electrical (120V, 30amp) on roof for Boiler	\$4,211.08	12/22/2017	
HVAC	784867	HSA: Condensate Drain Survey	\$9,045.83	9/15/2017	
HVAC	780276	HSA - Chill water piping throughout the building - (see comments)	\$36,014.78	9/8/2017	
HVAC	750219	HSA-Distribution Basement - Replace the exhaust fan motor	\$16,502.20	7/25/2017	
Interior	530792	HSA 1235 Mission Basement Remodel Phase 1	\$247,573.35	6/1/2016	
Interior	675319	HSA: Enclose the kitchen by adding a new wall / look at HVAC affected by wall	\$25,856.41	2/15/2017	
Interior	1012163	HSA - Paint walls in Distribution Silver Lining 2119-60 & Titanic Rose 2092-50	\$7,758.69	10/19/2018	
Interior	1036640	HSA: 1235 Mission Basement Breakroom: Install Exhaust Fan into Women's RR	\$2,103.08	12/5/2018	
Interior	1031952	HSA - Tape & paint ceiling between 2 doors from Distribution office to counter	\$760.02	11/26/2018	
Interior	971248	HSA-Carpet and Paint for Interview area on 1st Floor CO#1 Complete Project on OT	\$49,172.02	8/13/2018	
Interior	908990	HSA: connect the power whip of cubicle B-14, B-15, B-33 to B-37 to an outlet	\$11,670.76	5/3/2018	
Interior	902796	HSA - Patch and Paint Room	\$3,271.61	4/23/2018	
Interior	872632	HSA: Replace carpet on both set of stairs coming from the roof to the Basement	\$33,832.60	2/28/2018	
Interior	871999	HSA-Renovate breakroom at 1235 Mission - Basement (B-F)	\$74,892.25	2/27/2018	
Interior	865968	HSA - Abate sheetrock	\$4,174.05	2/13/2018	
Interior	852159	HSA: Carpet for Basement - Lactation Room	\$4,583.23	1/22/2018	
Interior	835363	HSA-Carpet and Paint for Interview area on 1st Floor	\$170,995.69	12/19/2017	
Interior	828348	HSA - Replace the emergency exit door on Minna St - ground floor	\$11,018.61	12/5/2017	
Interior	720627	HSA: 1235 Mission Basement Remodel - HVAC, Touch-up Paint & Emergency Lights	\$21,609.71	5/31/2017	
Interior	715356	HSA: 1235 Mission Basement Repair Duct Work/HVAC per RE/A/ffe	\$13,440.98	5/17/2017	
Plumbing	954860	HSA - 1235 Mission Sump Pump	\$9,699.73	7/19/2018	
Plumbing	800147	HSA: 1235 Mission: Sewage ejector pump replacement	\$40,158.69	10/12/2017	
<b>2019 CMMS Report (DPW/BBR)</b>			<b>\$1,045,993.79</b>		

SUMMARY	
ADA	\$52,243.36
Electrical	\$195,405.06
HVAC	\$65,773.89
Interior	\$682,713.06
Plumbing	\$49,858.42
<b>\$1,045,993.79</b>	

APPENDIX B-1

**EXHIBIT D**

**LOBBY WORK SCHEDULE AND BUDGET**

(See Attached)

## **1235 Mission Lobby Remodel Septmber 2013 thru October 2014**

### **Project Budget**

#### **William Duff Arch**

architectural fees, Drawings, permits, Job oversite.

#### **KLW Construction**

Demo phase 1,2,3 and abatement

Build pony walls & temporary walls

Build concrete ramp in back area

Concrete floor stain

Electrical work

Plumbing work

HVAC work

Store Front window assembly(estimate)

Toilet Partitons

Painting

Tile work for bathrooms

Exterior Manual Roll up door

Ceiling Accoustical treatment

Profit/Overhead 15%

Sound system, security door locks, video monitors, lobby furnishings by Human Services Agency

5/15/2014

\$ 1,300,000.00

\$ 134,303.74

\$ 921,725.00

\$ 76,000.00

\$ 52,000.00

\$ 42,000.00

\$ 61,500.00

\$ 75,000.00

\$ 85,000.00

\$ 145,000.00

\$ 45,000.00

\$ 22,000.00

\$ 78,000.00

\$ 80,000.00

\$ 22,000.00

\$ 18,000.00

\$ 120,225.00

\$ 243,971.00

## 1235 Mission Street Lobby Remodel Project Schedule

<u>Month</u>	<u>Task</u>	<u>Lead</u>
September-13*	Demolition	KLW
October-13*	Remediation of floor HazMat	KLW
October-13*	Build pony walls rough framing	KLW
November-13*	Concrete work new ADA ramp	KLW
December-13*	Electrical mods/data wiring	KLW/DT
January-14*	Prep Floors for Staining/Paint overhead	KLW
February-14*	Storefront entrance Minna Street overhead lighting	KLW
March-14*	Metal sheathing /granite work	KLW
April-14*	waiting Planning for Minna St exit	Dept of Planning
May-14*	Finish service counters/final finish roll-up door/install phones/modular furnishings/lobby furniture	KLW
June-14*	Phase 1 Lobby open to public	KLW/HAS
July-14*	Phase 2 lobby demo and build out	KLW
August-14*	Painting and flooring	KLW
September-14*	Restrooms	KLW
October -14*	Furnishings/Final Inspections Open to Public	KLW

**Completion Date****STATUS**

14-Oct-13	Complete
6-Nov-13	Complete
30-Nov-13	Complete
10-Dec-13	Complete
18-Jan-14	Complete
7-Feb-14	Complete
27-Feb-14	Complete
17-Mar-14	Complete
22-Apr-14	Complete
23-May-14	Complete
16-Jun-14	On-Sched
24-Jul-14	
18-Aug-14	
10-Sep-14	
15-Oct-14	

City and County of San Francisco



(415) 554-8200

(415) 554-8218

http://sfdpw.org

Department of Public Works

PROJECT CONTROLS & SERVICES

1680 Mission Street, S.F., CA 94103

MAURICE WILLIAMS

Edwin M. Lee, Mayor  
Mohammed Nuru, Director

**Contract Service Order Request**

- New Service Order       Modify an Existing Service Order

Date: 04/08/2016

**Service Order Information**

Master Agreement: 182871 - Job Order Contract No. J23 General Building Services (Rebid)

Service Order No.: J23-12

DPW Order No.: 182871

Project Title: 1235 Mission Street Boilers

Consultant: Angotti & Reilly, Inc.

Consultant Contact: James Reilly

Consultant Contact Email: jimreilly@angotti-reilly.com

Requesting Dept.: DEPARTMENT OF HUMAN SERVICES

PM Contact: Jason Chin

PM Contact Email: Jason.Chin@sfdpw.org

DPW Contact: Joel Uchi

DPW Contact Email: Joel.Uchi@sfdpw.org

DPW Contact Phone No.: (415) 558-4686

**Task Detailed Information**

- Hazmat/Construction: Requires 3 Bids       3 Bid Solicitation (Sec 6.63)

**Task Description:** (All work under this task to be performed in accordance with all terms under the Master Agreement)

Remove and replace two existing rooftop boilers. Install two new "Laars" type outdoor boilers including all water piping, electrical, gas piping, controls and associated work.

Refer to Final Scope of Work, dated 03/09/2016.

Description	This Request	Previous/Original	Total (As-Modified)
Task Estimate \$ (NTE):	\$178,316.64	\$0.00	\$178,316.64
Duration:	45 calendar days	0 calendar days	45 calendar days

**From:** [Board of Supervisors, \(BOS\)](#)  
**To:** [BOS-Supervisors](#)  
**Subject:** FW: Lime scooters being used by middle school students  
**Date:** Wednesday, January 15, 2020 10:20:00 AM

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**From:** Sue Vaughan <selizabethvaughan@gmail.com>  
**Sent:** Tuesday, January 14, 2020 8:45 PM  
**To:** Cityattorney <Cityattorney@sfcityatty.org>; MTABoard <MTABoard@sfmta.com>; District Attorney, (DAT) <districtattorney@sfgov.org>; Board of Supervisors, (BOS) <board.of.supervisors@sfgov.org>; CAC <cac@sfmta.com>  
**Subject:** Lime scooters being used by middle school students

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

This afternoon, on 1-14-2020, I observed middle school students outside of Presidio Middle School at 450 39th Avenue using a Lime scooter.

I just looked at Lime's legal agreement which states that people must be 18 or older to use these scooters.

Susan Vaughan  
District One

**From:** [Board of Supervisors, \(BOS\)](#)  
**To:** [BOS-Supervisors](#)  
**Subject:** FW: Toilet services need health equipment from sfdpw/sfdpw  
**Date:** Wednesday, January 15, 2020 10:18:00 AM

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-----Original Message-----

From: Aaron Goodman <amgodman@yahoo.com>  
Sent: Wednesday, January 15, 2020 9:52 AM  
To: Board of Supervisors, (BOS) <board.of.supervisors@sfgov.org>  
Subject: Toilet services need health equipment from sfdpw/sfdpw

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

Visited a public toilet at Powell street station this morning. Worker manning the station was nice and was working diligently.

The problem was lack of sfdph supplies for cleaning. No rubber gloves or masks for the worker or any eye protection.

None of these workers manning these stations should be without some form of protection.

I just happened to need a facility and struck up a conversation. What is troubling is that we have no restrooms in the am available downtown except these facilities and if they are not properly staffed and supplied we know the results.

Please forward this to the appropriate agency head and make sure healthy supplies are distributed to these facilities ASAP...

The workers on the front lines of the bathroom issues in sf deserve to have basic protective gear.

Ag D11

Sent from my iPhone

**From:** [Board of Supervisors, \(BOS\)](#)  
**To:** [BOS-Supervisors](#)  
**Subject:** FW: Bus Only Lane - what about trucks?  
**Date:** Wednesday, January 15, 2020 10:17:00 AM

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**From:** Aaron Goodman <amgodman@yahoo.com>  
**Sent:** Wednesday, January 15, 2020 7:29 AM  
**To:** Board of Supervisors, (BOS) <board.of.supervisors@sfgov.org>  
**Subject:** Fwd: Bus Only Lane - what about trucks?

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

Sent from my iPhone

Begin forwarded message:

**From:** Aaron Goodman <[amgodman@yahoo.com](mailto:amgodman@yahoo.com)>  
**Date:** January 15, 2020 at 7:28:46 AM PST  
**To:** "[joe@sfexaminer.com](mailto:joe@sfexaminer.com)" <[joe@sfexaminer.com](mailto:joe@sfexaminer.com)>  
**Subject:** **Bus Only Lane - what about trucks?**

Seems only logical that the bay bridge, 101 and 280 all consider direct connective routes for buses, delivery trucks and larger construction vehicles.

To have these big fuel guzzlers sitting in traffic or delaying construction deliveries makes it worse for everyone environmentally.

Seeing carpool lanes stuffed with Prius and Tesla cars with single passengers means it's beyond time to change the game of driving.

Require the lane changes to start with bus in the carpool only but add vehicles that make sense like a cement mixer or a UPS/Fedex trucks and any major delivery trucks. Remove the carpool lane or shift it over and separate the big vehicles from the cars.

One less car lane on the freeway may incentivize people to ride mass transit more and drive less in the future for SF

A.Goodman D11

Sent from my iPhone

**From:** [Board of Supervisors, \(BOS\)](#)  
**To:** [BOS-Supervisors](#)  
**Subject:** FW: File 190973  
**Date:** Tuesday, January 14, 2020 6:05:00 PM

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**From:** Off Eyeam <leerogers562@gmail.com>  
**Sent:** Monday, January 13, 2020 1:07 PM  
**To:** Major, Erica (BOS) <erica.major@sfgov.org>  
**Cc:** Board of Supervisors, (BOS) <board.of.supervisors@sfgov.org>  
**Subject:** File 190973

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

Hello Erica and honorable members of the board of supervisors.  
Thanks for the job you are doing to create policies for the citizens of San Francisco to benefit from. I'm a honorably discharged United States Navy veteran and a member of operation EVAC. An organisation to prevent veteran suicide and opioid overdose. Releaf herbal cooperative was our first dispensary client . Therefore, not only is it my moral obligation but my honor to advocate on their behalf. With your vote you can also support San Francisco veterans. Humbly I request Supervisors of San Francisco to support Relief and expedite their relocation process.

Respectfully,

Rogers, L. V.  
U S Navy

**From:** [Board of Supervisors, \(BOS\)](#)  
**To:** [BOS-Supervisors](#)  
**Subject:** FW: 1/14/20, Item 23: SPUR supports new PDAs  
**Date:** Tuesday, January 14, 2020 6:03:00 PM  
**Attachments:** [SPUR supports new PDAs.pdf](#)

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**From:** Kristy Wang <[kwang@spur.org](mailto:kwang@spur.org)>  
**Sent:** Tuesday, January 14, 2020 8:49 AM  
**To:** Board of Supervisors, (BOS) <[board.of.supervisors@sfgov.org](mailto:board.of.supervisors@sfgov.org)>  
**Cc:** Quan, Daisy (BOS) <[daisy.quan@sfgov.org](mailto:daisy.quan@sfgov.org)>; BOS Legislation, (BOS) <[bos.legislation@sfgov.org](mailto:bos.legislation@sfgov.org)>; Calvillo, Angela (BOS) <[angela.calvillo@sfgov.org](mailto:angela.calvillo@sfgov.org)>; Switzky, Joshua (CPC) <[joshua.switzky@sfgov.org](mailto:joshua.switzky@sfgov.org)>; Rodgers, AnMarie (CPC) <[anmarie.rodgers@sfgov.org](mailto:anmarie.rodgers@sfgov.org)>; Rahaim, John (CPC) <[john.rahaim@sfgov.org](mailto:john.rahaim@sfgov.org)>; Nick Josefowitz <[njosefowitz@spur.org](mailto:njosefowitz@spur.org)>; ajohn-baptiste <[ajohn-baptiste@spur.org](mailto:ajohn-baptiste@spur.org)>; Laura Tolkoff <[ltolkoff@spur.org](mailto:ltolkoff@spur.org)>  
**Subject:** 1/14/20, Item 23: SPUR supports new PDAs

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

Dear Supervisors:

**SPUR strongly encourages the Board of Supervisors to authorize the Planning Department to apply to confirm and create new Priority Development Areas, Priority Conservation Areas and Priority Production Areas as part of Plan Bay Area 2050.** San Francisco has been a leader in the region in creating area plans in coordination with its designated Priority Development Areas for Plan Bay Area. At a time when the region is grappling with an overall housing shortage and an affordability crisis for low- and moderate-income people, and when communities are reconsidering exclusionary planning and zoning practices nationwide, it is forward-thinking for San Francisco to propose expanding its PDA designations to amenity- and transit-rich neighborhoods that have not previously been designated to accommodate new residents or jobs.

Please see attached for additional details, and do not hesitate to let me know if you have any questions.

Best,  
Kristy Wang

Kristy Wang, LEED AP  
Community Planning Policy Director  
SPUR • Ideas + Action for a Better City  
(415) 644-4884  
(415) 425-8460 m  
[kwang@spur.org](mailto:kwang@spur.org)





**SPUR**

San Francisco | San Jose | Oakland

January 10, 2020

San Francisco Board of Supervisors  
1 Dr. Carlton B. Goodlett Place  
San Francisco, CA 94102-4689

**RE: January 14, 2020, Item 23: Amend San Francisco's Priority Development Area, Priority Conservation Area and Priority Production Area Designations [Board File 191120]**

Dear Supervisors:

**SPUR strongly encourages the Board of Supervisors to authorize the Planning Department to apply to confirm and create new Priority Development Areas, Priority Conservation Areas and Priority Production Areas as part of Plan Bay Area 2050.** San Francisco has been a leader in the region in creating area plans in coordination with its designated Priority Development Areas for Plan Bay Area. At a time when the region is grappling with an overall housing shortage and an affordability crisis for low- and moderate-income people, and when communities are reconsidering exclusionary planning and zoning practices nationwide, it is forward-thinking for San Francisco to propose expanding its PDA designations to amenity- and transit-rich neighborhoods that have not previously been designated to accommodate new residents or jobs.

We appreciate that the newly-proposed PDAs are located in areas with high-quality transit service. These are environmentally-appropriate places for new infill growth. This will help the city meet its many of its ambitious goals for sustainability and will support new transit investments. Again, we appreciate that the PDAs are geographically distributed, as we believe that all parts of San Francisco have a role to play in accepting new housing and creating a more inclusive and equitable city and region. Thank you for your consideration. Please do not hesitate to contact us if you have any questions.

Best,

Kristy Wang  
Community Planning Policy Director

CC: SPUR Board of Directors

**From:** [Board of Supervisors, \(BOS\)](#)  
**To:** [BOS-Supervisors](#)  
**Subject:** FW: Support amendments to Priority Area Designations (Agenda item 23, file no. 191120)  
**Date:** Thursday, January 23, 2020 2:43:00 PM

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**From:** Christopher Pederson <chpederson@yahoo.com>

**Sent:** Sunday, January 12, 2020 4:02 PM

**To:** Board of Supervisors, (BOS) <board.of.supervisors@sfgov.org>; Yee, Norman (BOS) <norman.yee@sfgov.org>; Fewer, Sandra (BOS) <sandra.fewer@sfgov.org>; Stefani, Catherine (BOS) <catherine.stefani@sfgov.org>; Peskin, Aaron (BOS) <aaron.peskin@sfgov.org>; Marstaff (BOS) <marstaff@sfgov.org>; PrestonStaff (BOS) <prestonstaff@sfgov.org>; Haneystaff (BOS) <haneystaff@sfgov.org>; MandelmanStaff, [BOS] <mandelmanstaff@sfgov.org>; Ronen, Hillary <hillary.ronen@sfgov.org>; Walton, Shamann (BOS) <shamann.walton@sfgov.org>; Safai, Ahsha (BOS) <ahsha.safai@sfgov.org>

**Subject:** Support amendments to Priority Area Designations (Agenda item 23, file no. 191120)

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

Dear President Yee and Members of the Board of Supervisors:

I urge you to support the proposed amendments to San Francisco's Priority Development Area (PDA) designations.

From a climate perspective, by virtue of its mild climate, walkability, and extensive transit network, San Francisco is one of the most appropriate locations in the entire state for increased housing. The California Air Resources Board has determined that California cannot hope to meet its greenhouse gas reduction goals for transportation unless the state significantly reduces vehicle miles traveled. One of the most promising strategies for accomplishing that is locating new housing close to major transit corridors and employment centers. By designating additional PDAs along major transit corridors in the western half of the city, the proposed amendments will help San Francisco to meet its own and the state's goals for reducing greenhouse gas emissions.

I also urge the Board to follow up on these amendments by supporting expedited planning work to implement the PDAs with the urgency that the climate crisis requires. If the planning process instead bogs down in a lackadaisical, protracted bureaucratic morass, then the promise of these new PDA designations will be squandered.

Thank you for ensuring that San Francisco takes the kind of aggressive action that the climate emergency requires.

Sincerely,

Christopher Pederson

Westside resident (District 7)

**From:** [Board of Supervisors, \(BOS\)](#)  
**To:** [BOS-Supervisors](#)  
**Subject:** FW: Golden Gate Park  
**Date:** Tuesday, January 14, 2020 5:54:00 PM

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**From:** David Romano <droma4@gmail.com>  
**Sent:** Tuesday, January 14, 2020 3:30 PM  
**To:** Board of Supervisors, (BOS) <board.of.supervisors@sfgov.org>  
**Cc:** SF Ocean Edge <sfoceanedge@earthlink.net>  
**Subject:** Golden Gate Park

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

Dear Supervisors,

Please don't approve any additional lighting for the Music Concourse or allow the Ferris Wheel to run at night. If we truly want to celebrate the 150th birthday of Golden Gate Park, we should honor nature and the Park by leaving it as dark as safety allows for one year, instead of adding lights. Limiting light pollution would show respect for the Park and actually benefit all the flora and fauna that make up Golden Gate Park.

In San Francisco, where the ambient lighting at night is already bright, let the night sky above Golden Gate Park be restored, as closely as possible, to how it was 150 years ago. That would be a fitting tribute to the City's crown jewel. Golden Gate Park is not a county fair ground or an amusement park.

Sincerely,

David Romano  
San Francisco

**From:** [Board of Supervisors, \(BOS\)](#)  
**To:** [BOS-Supervisors](#)  
**Subject:** FW: COA- Music Concourse, Golden Gate Park, Jan. 15, 2020  
**Date:** Thursday, January 23, 2020 2:42:00 PM  
**Attachments:** [Friends of the Music Concourse v8 1-14-20.pdf](#)

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**From:** Friends of the Music Concourse <musicconcourse@earthlink.net>  
**Sent:** Tuesday, January 14, 2020 11:39 AM  
**To:** Board of Supervisors, (BOS) <board.of.supervisors@sfgov.org>  
**Subject:** COA- Music Concourse, Golden Gate Park, Jan. 15, 2020

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

Dear Clerk of the Board,

Friends of the Music Concourse is very concerned about the current proposal to place a lighted observation wheel in the Music Concourse for up to one year and to light the Music Concourse Bandshell, as well as installing 19 searchlights on the roof of the Bandshell.

Attached please find our letter outlining our concerns about the negative impacts on the historic Music Concourse and on Golden Gate Park as a historic landscape park.

Please distribute to the members of the Board of Supervisors and enter it into the official record.

Sincerely,

Katherine Howard, ASLA

Co-Chair

Friends of the Music Concourse



## Friends of the Music Concourse (c)

Dedicated to the Preservation  
of the Historic Golden Gate Park  
Music Concourse

January 14, 2020

Historic Preservation Commission  
Planning Department, City and County of San Francisco  
1650 Mission Street, Suite 400, San Francisco, CA 94103

Subject: 2019-022126COA: 55 Hagiwara Tea Garden Drive - Proposed Lighted Observation wheel and Bandshell in Music Concourse

Commission President Aaron Jon Hyland and Commissioners,

Friends of the Music Concourse was established at the time that a garage was proposed for the Music Concourse Bowl in Golden Gate Park [the Park.] Part of that proposal included cutting down all of the pollarded trees in the Music Concourse in order to build the garage under the Bowl. Fortunately, public outrage was aroused at the possible loss of the beloved 100-year-old trees and the other historic features. The trees were saved, the historic design was preserved, and the area was landmarked to protect this remarkable historic asset from future degradation. However, there are always temptations to look at parkland and park facilities and view them as opportunities for development or producing income, ignoring that the projects proposed might be detrimental to the very parkland that attracts the public in the first place.

Friends of the Music Concourse is very concerned about the current proposal to place a lighted observation wheel in the Music Concourse for one year and to light the Music Concourse Bandshell, as well as installing 19 searchlights on the roof of the Bandshell. We will examine the possible impacts to both the Concourse and to Golden Gate Park in this letter.

### **GGP is historically a landscape park, not an amusement park or a carnival.**

The Recreation and Park website lists the natural beauty of the Park first in its list of the Park's characteristics.

"Golden Gate Park is known primarily for its naturalistic beauty. From a vast, windswept expanse of sand dunes, park engineer William Hammond Hall and master gardener John McLaren carved out an oasis—a verdant, horticulturally diverse, and picturesque public space where city dwellers can relax and reconnect with the natural world. The rest, as they say, is history." <sup>1</sup>

The National Register designation describes it as a "*green oasis in a sea of urbanization.*" <sup>2</sup> It further states that,

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<sup>1</sup> Department of Recreation and Park Website, <https://sfrecpark.org/destination/golden-gate-park/>

<sup>2</sup> "National Register of Historic Places," OMB No. 1024-0018, United State Department of the Interior, National Park Service, Oct. 15, 2004 certification. Section 7, page 1.

\* \* \* \* \*

"Golden Gate Park was conceived as a naturalistic pleasure ground park to provide a sylvan retreat from urban pressures for all citizens, rich and poor."<sup>3</sup>

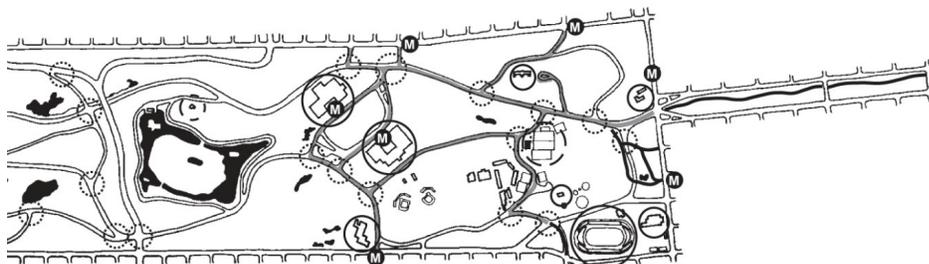
**Over the years, Golden Gate Park has both experienced and resisted intense development.**

The 1998 Golden Gate Park Master Plan (Master Plan) describes the intent of designer William Hammond Hall to lay out a park that was, for the most part, a wild and natural landscape west of Strawberry Hill, and, for the most part, open to human activity in the eastern section. However, the intent was always to have all activities take place in a park setting, and to continue to provide a landscape park experience for residents. The Master Plan shows that much development has taken place over the years, as more and more built facilities have been added to the Park and more and more landscape has been lost.

"Now in its second century, the park is facing new and growing challenges. Most of these are the result of the growth and change of the City around the park. The kind of vision that was required to create the park from barren sand dunes is also needed today to preserve and enhance the park to ensure that it will continue to serve future generations. This Master Plan for Golden Gate Park attempts to provide that vision and lay the groundwork for its preservation and enhancement into the next century."<sup>4</sup>

**In the Department of Recreation and Park's own planning guide, the Golden Gate Park Master Plan, lighting is intended to be limited in Golden Gate Park overall and in the Music Concourse specifically.**

Lighting of Golden Gate Park, including the Music Concourse, is intended to be primarily for "use and safety considerations."<sup>5</sup> It is not intended to increase night use. This map from the Golden Gate Park Master Plan (1998) shows the only areas that may be lighted under the Recreation and Park Department's own guidelines. In the Music Concourse area specifically, the de Young Museum and the California Academy of Sciences are the only areas that are designated as "night use areas." The rest of the Music Concourse and the Bandshell are not even designated as "potential night use areas."<sup>6</sup>



Legend

○	Night use areas	—	Primary access roads and adjacent paths to night use areas (highest priority)
⊖	Potential night use areas	—	Path access to night use areas (highest priority)
⊘	Important intersections (medium priority)	●	MUNI stops serving night use areas

9-5 Lighting Plan, GGPMP<sup>7</sup>

<sup>3</sup> "National Register of Historic Places," OMB No. 1024-0018, United State Department of the Interior, National Park Service, Oct. 15, 2004 certification. Section 7, page 1.

<sup>4</sup> Introduction, "Golden Gate Park Master Plan," 1998. Page 1-1.

<sup>5</sup> Lighting Plan, Golden Gate Park Master Plan, 1998. Page 9-5.

<sup>6</sup> Lighting Plan, Golden Gate Park Master Plan, 1998. Page 9-5.

<sup>7</sup> Lighting Plan, Golden Gate Park Master Plan, 1998. Page 9-5.

\* \* \* \* \*

The cumulative impact of a lighted observation wheel and adding extensive lighting and spotlights to the Bandshell is being ignored by submitting separate Certificates of Appropriateness.

The Department of Recreation and Park has decided to present the COA for the Observation wheel and the one for the Bandshell lighting to the HPC in two separate meetings. The artificial nighttime lighting created by these two projects will have a cumulative impact on the Music Concourse and on Golden Gate Park, and those impacts should be considered together in that context.

What will be the extent of lighting the Bandshell? How will events here add to the impact on the Park from large concerts and other events?

Will there be a large number of lighted concerts in the Bandshell in the evenings? How does this correlate with the Recreation and Park's previously stated determination to limit large events in Golden Gate Park over a year's time? Will the Department be eliminating or cutting back on such events as Hardly Strictly Bluegrass or the Outside Lands Festival? The many festivals bring enormous crowds into the parkland and impact it not only through the crowds that trample the parkland but also through the all-night lighting that is installed for protection of equipment and security of the performance areas.

Lighted observation wheel and intense lighting for Bandshell are not appropriate for the Music Concourse or for Golden Gate Park

The introduction of the lighted observation wheel and the intense lighting proposed for the Bandshell will change the Music Concourse from the classic outdoor performance space it was established to be when laid out in 1895, into a space with more of a carnival atmosphere. Golden Gate Park as a whole was conceived as a naturalistic pleasure ground park to provide a sylvan retreat from urban pressures for all citizens, rich and poor. The parkland has evolved into a space in which wildlife has also found a refuge and a home. With increased development, there is a point at which both wildlife habitat and the sense of parkland will be lost. All that will be left if a series of amusements with a few trees interspersed in between, to remind us that this was once a great landscape park.

An observation wheel is not a historic feature of the Music Concourse

The Midwinter Fair ferris wheel was in the Park for less than a year. It was removed at the end of the Fair, along with the majority of elements that had been imposed on the Park for the Midwinter Fair, over the objections of many.<sup>8</sup>

The National Register contains three full pages of lists of Individual Park Resources in Golden Gate Park.<sup>9</sup> The ferris wheel from the Mid-Winter Exposition is not on that list.

The City landmarking (249) does not list a ferris wheel as either contributing or non-contributing.

The current proposal is therefore for a non-contributing element that will be located in the Music Concourse longer than even the original ferris wheel.

Protecting habitat and biodiversity are part of the Recreation and Open Space Element (ROSE) but are not mentioned in detail the COA application

The COA does not quote all of Objective 4 from the ROSE. Policy statements about the importance of protecting biodiversity and wildlife are left out of the COA:

*"OBJECTIVE 4*

*PROTECT AND ENHANCE THE BIODIVERSITY, HABITAT VALUE, AND ECOLOGICAL INTEGRITY OF OPEN SPACES AND ENCOURAGE SUSTAINABLE PRACTICES IN THE DESIGN AND MANAGEMENT OF OUR OPEN SPACE SYSTEM*

*San Francisco is a heavily urbanized city, which nonetheless has a rich variety of plant and animal communities. Among these are coastal scrub, grassland, oak woodlands, marsh, and*

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<sup>8</sup> Clary, Raymond H. "The Making of Golden Gate Park, 1865-1906." Page 112 - 113.

<sup>9</sup> "National Register of Historic Places," OMB No. 1024-0018, United State Department of the Interior, National Park Service, Oct. 15, 2004 certification. Section 7, pages 3- 5.

stream-side habitats and their associated wildlife. Some of these habitats hold species found nowhere outside of the Bay Area. The City also has significant landscaped areas, such as conifer plantings in Golden Gate Park. **By providing food and shelter for migratory and resident birds, butterflies, and insects they too play a major role in supporting San Francisco's biodiversity. Biodiversity includes the variety of living organisms, the genetic differences among them, and the communities and ecosystems in which they occur. Maintaining biodiversity requires genetic diversity, species diversity, and habitat diversity. San Francisco can be a leader in creating new and more sustainable open spaces by ensuring that all open spaces, including new and renovated park spaces, are developed in a way that enhances and works with local biodiversity. "**

" POLICY 4.1

Preserve, protect and restore local biodiversity.

". . .The City should employ appropriate management practices to maintain a healthy and **resilient ecosystem which preserves and protects plant and wildlife habitat . . ."** <sup>10</sup>

The ROSE is very specific about protecting wildlife from artificial lighting. This information is also left out of the COA.

POLICY 4.3

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

**Lighting. Park lighting should be environmentally efficient and provide safety and security to park users, while being as limited as possible in order to protect wildlife in natural areas from the impacts of light pollution.** <sup>11</sup>

### **Environmental organizations have submitted letters of concern about these projects**

Many organizations have written to your commission about the negative impact of the proposed projects on the wildlife and biodiversity present in - and migrating over - Golden Gate Park and the Music Concourse. Please refer to the attached letters from the Sierra Club, Golden Gate Audubon Society, Raptors Are The Solution, and Coyote Yipps. Comments include:

". . .we believe that this installation will have significant negative impacts on migratory and nesting birds as well as other wildlife. Due to these potential impacts, as well as potential impacts to "dark skies", we ask that a full Environmental Impact Report (EIR) be prepared before any permit or other approval is considered." Sierra Club, 1-7-20.

". . .The proposed 150' structure in the midst of the park poses a threat to birds flying through the park and the artificial light poses an additional risk. . . ." Golden Gate Audubon Society, 1-3-20.

". . . We believe the proposed structure will pose a threat to raptors and other birds flying through the park: The glass and artificial light could very possibly confuse and disorient them, resulting in collisions and mortality." Raptors Are The Solution, 1-7-20

". . . Not only will this project — the construction and even more so, the final project — be disruptive to wildlife in the area through bright lights and noise, but it's also going in the opposite direction to what most people want for our park. . . ." Coyote Yipps.

This proposal has already been heard and voted on at the Recreation and Park Commission - before bringing it to the Historic Preservation Commission <sup>12</sup>

<sup>10</sup> [https://generalplan.sfplanning.org/Recreation\\_OpenSpace\\_Element\\_ADOPTED.pdf](https://generalplan.sfplanning.org/Recreation_OpenSpace_Element_ADOPTED.pdf)

<sup>11</sup> [https://generalplan.sfplanning.org/Recreation\\_OpenSpace\\_Element\\_ADOPTED.pdf](https://generalplan.sfplanning.org/Recreation_OpenSpace_Element_ADOPTED.pdf)

<sup>12</sup> SF Recreation and Park Commission, December 19, 2019, [www.sfgovtv.org](http://www.sfgovtv.org), video on demand.

The Recreation and Park Commission approved this project on December 19th, 2019, before the HPC's hearing. This has happened with other projects. The preservation commissioners have asked in the past, and RPC has agreed, that the HPC should be notified and given the opportunity to hear, evaluate, and approve or propose mitigations before the issues are presented to the RPC.

Therefore, if the RPC has agreed to a contract without the HPC's approval, that is their responsibility and should not affect your decision about this project.

Golden Gate Park is already stressed with the number of visitors that enter the Park every year.

According to the Department of Recreation and Park website, Golden Gate Park has more than 13 million visitors each year.<sup>13</sup> Having a large number of visitors brings wear and tear to the parkland and stress to the wildlife living in it. It is unfortunate that a choice is being made to highlight the park by adding artificial lighting to such an extent that it detracts from the landscape qualities, compromises habitat, and threatens wildlife.

What reassurance does the public have that all of the structures and lighting would be removed completely at the end of the celebration?

Not everyone feels the same way about protecting parkland, as both gardener John McLaren and designer William Hammond Hall observed. What reassurance can we have that ALL of the structures and ALL of the lighting will be completely removed immediately after the end of the celebration, and that the Park and Bandshell will not be damaged in the process of either set-up or breakdown of the equipment.

"It's a perfectly horrible way to ruin the natural beauty which is the essence of Golden Gate Park ."

In conclusion, I will quote from the second eloquent letter sent by Coyote Yipps,

*"Again, I am asking you to OPPOSE this plan. It's a perfectly horrible way to ruin the natural beauty which is the essence of Golden Gate Park with its trees, vegetation, old carved stone structures, and all the wonderful wildlife there. In fact, it will interfere with wildlife and actually cause stress. Our "wildness" areas are a valuable but vanishing commodity in our modern world where those who want to make a buck are eschewing nature for lights, noise, artificiality and anything else that will bring in money, which is then turned around to pave over more of paradise. Our youth are not going to value nature if there is less and less of it for them to fall in love with. "*<sup>14</sup>

Golden Gate Park is more than a collection of individual attractions. As stated in the National Register,

*"it is important to view Golden Gate Park as a whole. Golden Gate Park was developed over many years, but it was conceived as a single creation that we now consider an historic designed landscape."*<sup>15</sup>

Friends of the Music Concourse urges you to deny the Certificate of Appropriateness for both the Observation Wheel and the lighting of the Bandshell.

Sincerely,

*Katherine Howard*

Katherine Howard, ASLA

Co-Chair

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<sup>13</sup> "We're proud to welcome more than 13 million visitors each year to Golden Gate Park, one of San Francisco's greatest treasures " Recreation and Park Department website. <https://sfrecpark.org/destination/golden-gate-park/>

<sup>14</sup> Kessler, Janet. Coyote Yipps, bandshell and spotlights, 1-12-20.

<sup>15</sup> "National Register of Historic Places," OMB No. 1024-0018, United State Department of the Interior, National Park Service, Oct. 15, 2004 certification. Section 7, page 2

**From:** [Jordan Davis](#)  
**To:** [Board of Supervisors, \(BOS\)](#); [Prop Q Working Group](#); [justice@dsasf.org](mailto:justice@dsasf.org)  
**Subject:** Police Staffing Levels  
**Date:** Thursday, January 16, 2020 3:14:33 PM

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

Dear Board Of Supervisors,

I just wanted to let you know my thoughts about police staffing levels from a democratic socialist (small "d" small "s") perspective.

In short, staffing levels should be cut.

With a looming budget deficit, we should be focusing on life affirming programs, such as deeply affordable housing, jobs, education, healthcare, etc. and not on expanding the police state.

When people go without, then who can be mad when they engage in anti-social behavior. Expanding the police state traps us in a vicious cycle.

Please reinvest in life affirming programs, like what the progressive majority is proposing.

Sincerely,

-Jordan

**From:** [Board of Supervisors, \(BOS\)](#)  
**To:** [BOS-Supervisors](#)  
**Subject:** FW: Property crime  
**Date:** Thursday, January 23, 2020 2:42:00 PM

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**From:** Luis Belmonte <lbelmonte@7hp.com>  
**Sent:** Thursday, January 16, 2020 3:09 PM  
**To:** Board of Supervisors, (BOS) <board.of.supervisors@sfgov.org>  
**Subject:** Property crime

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

We are in the process of driving away from the City people who pay the Bill's because they are fed up with having their cars broken into and packages stolen off their doorstep. If the taxpayers go, you won't have any money to spend.

Hire more cops any support them.

Luis Belmonte

Order your copy of my new book "[Real Estate 101](#)" on Amazon now and be sure to leave a review.

**From:** [Board of Supervisors, \(BOS\)](#)  
**To:** [BOS-Supervisors](#)  
**Subject:** FW: in favor of police hiring  
**Date:** Thursday, January 23, 2020 2:42:00 PM

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**From:** Marjorie Fulbright <fulbrightm@yahoo.com>  
**Sent:** Thursday, January 16, 2020 3:14 PM  
**To:** Board of Supervisors, (BOS) <board.of.supervisors@sfgov.org>  
**Subject:** in favor of police hiring

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

I am a long time resident and home owner in Catherine Stefani's district. I am writing to support her interest in getting more police hired in our City.

I would also like to see the legislation decriminalizing property crimes reversed and the impeachment of the DA who encourages street people to urinate and defecate on our sidewalks. If the police cannot stop people from committing crimes or the legal system gives criminals a revolving door, the police cannot be effective.

Additionally street people leave litter- cardboard for their sleeping arrangements, drug paraphenalia, food, broken glass, etc. It is like living in a 3rd world country, not civilized society.

Marjorie Fulbright

**From:** [Board of Supervisors, \(BOS\)](#)  
**To:** [BOS-Supervisors](#)  
**Subject:** FW: Police Staffing Levels  
**Date:** Thursday, January 23, 2020 2:41:00 PM

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**From:** Ivy Anderson <ivyanderson07@gmail.com>  
**Sent:** Thursday, January 16, 2020 8:22 PM  
**To:** Board of Supervisors, (BOS) <board.of.supervisors@sfgov.org>  
**Subject:** Police Staffing Levels

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

Dear Board of Supervisors,

I write today regarding your forthcoming meeting (February 25th) to discuss police staffing levels.

I'm a long term resident of this city and published historian of San Francisco history. My research is specifically based on crime and "clean up" movements in this city, and they ways the police have historically failed to address many quality-of-life crimes that continue to plague our, now affluent, city by the Bay. I also live on the corner of 16th and Mission and have witnessed many instances of police violence and egregious police force. Based on personal experience, the police in my neighborhood make me feel less safe than my homeless neighbors do.

For the record: I support cutting police staffing numbers and diverting those funds into programs that will actually reduce crime -- affordable housing, medical care, mental health care, rehabilitation programs, safe injection sites, harm reduction programs, education, etc. I trust this comment will be noted and tallied.

Sincerely,  
Ivy Anderson

**From:** [Board of Supervisors, \(BOS\)](#)  
**To:** [BOS-Supervisors](#)  
**Subject:** FW: YET ANOTHER BREAK IN ON OUR BLOCK  
**Date:** Thursday, January 23, 2020 2:41:00 PM  
**Attachments:** [image001.png](#)

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**From:** Maile Sivert <[maile@themindfulbody.com](mailto:maile@themindfulbody.com)>  
**Sent:** Friday, January 17, 2020 3:49 PM  
**To:** Board of Supervisors, (BOS) <[board.of.supervisors@sfgov.org](mailto:board.of.supervisors@sfgov.org)>; Stefani, Catherine (BOS) <[catherine.stefani@sfgov.org](mailto:catherine.stefani@sfgov.org)>  
**Cc:** Tim Hayman <[tim@scopodivino.com](mailto:tim@scopodivino.com)>; Guy Glikman <[guy@themindfulbody.com](mailto:guy@themindfulbody.com)>  
**Subject:** Fwd: YET ANOTHER BREAK IN ON OUR BLOCK

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

Dear Board of Supervisors-

Please accept this as my formal support for increasing police staff in your February 25th meeting that my Supervisor Catherine Stefani mentioned in a newsletter. I am a business owner at California and Divisadero and we were broken into a few weeks ago. While nothing was stolen, we have to pay a \$1000 deductible to our insurance company, get into discussions with our already challenging landlord, and have a boarded up door that looks terrible and unprofessional. That is in addition to the violation of watching two professional thieves with special tools to break glass and pick locks on our security footage. Nearly every business on our block has been robbed in the past 12 months. Owning a business and paying exorbitant rent is no small task, and this is an additional challenge. We are extremely grateful none of our staff or neighbors were injured and nothing worse occurred. Please add more police patrol. Our city needs it.

Thank you,  
Maile Sivert  
Owner, The Mindful Body  
San Francisco Legacy Business

----- Forwarded message -----

**From:** **Tim Hayman** <[tim@scopodivino.com](mailto:tim@scopodivino.com)>  
**Date:** Fri, Dec 20, 2019 at 5:48 PM  
**Subject:** YET ANOTHER BREAK IN ON OUR BLOCK  
**To:** <[stefanistaff@sfgov.org](mailto:stefanistaff@sfgov.org)>, Jean, Michelle (POL) <[Michelle.Jean@sfgov.org](mailto:Michelle.Jean@sfgov.org)>, Engler, Joseph (POL) <[Joseph.Engler@sfgov.org](mailto:Joseph.Engler@sfgov.org)>  
**Cc:** <[info@phra-sf.org](mailto:info@phra-sf.org)>, <[MayorLondonBreed@sfgov.org](mailto:MayorLondonBreed@sfgov.org)>, Maile Sivert <[maile@themindfulbody.com](mailto:maile@themindfulbody.com)>, Bennett, Samuel (BOS) <[samuel.bennett@sfgov.org](mailto:samuel.bennett@sfgov.org)>

We're getting pretty tired of this. Two guys, with backpacks, sitting in front of the Mindful Body, turn and break in at 5am this morning. This is a GIGANTIC window that would have made a TON of noise, and will unfortunately take 6 weeks for Mindful Body to replace and probably cost a small fortune. I'm still learning from the business what other damage and theft happened.

**This is the 7<sup>th</sup> break in on this block in less than a year.**

Let that sink in.

It is painfully and highly apparent that there is no deterrent for criminals to continue breaking in seemingly entirely unfettered. We would like the police to hold a meeting with our community here and calm everyone's nerves by telling us what is going to be done to improve conditions here. If this great city, and what should be considered one of it's nicer neighborhoods, seems this unsafe for small businesses to run unmolested, what is there to attract new small businesses to the ever growing empty spaces. Our association and neighborhood are anxious for an improvement.

Thanks for your time and consideration.

To: Catherine Stefani, District 2 Supervisor

To: Captain Michelle Jean

To: Captain Joseph Engler

Cc: London Breed, Mayor

Cc: Samuel Bennett, District 2 Aide

Cc: Pacific Heights Residents Association

Cc: Malie Sivert, Owner, Mindful Body

Tim

President | Upper Divis Merchants Association

Owner | Scopo Divino

Scopo Divino

The Divine Purpose of Wine

2800 California Street @ Divisadero

[tim@scopodivino.com](mailto:tim@scopodivino.com) | 415.928.3728

[www.scopodivino.com](http://www.scopodivino.com)

#ScopoDivino #WineTherapy



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**Maile Sivert**

Owner & Yoga Teacher



Email: [maile@themindfulbody.com](mailto:maile@themindfulbody.com)

Phone: [\(415\)931-2639](tel:(415)931-2639)

[Yoga Schedule](#) [Massage Bookings](#) [The MindSet](#)



**From:** [Board of Supervisors, \(BOS\)](#)  
**To:** [BOS-Supervisors](#)  
**Subject:** FW: # of Police Officers  
**Date:** Thursday, January 23, 2020 2:41:00 PM

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-----Original Message-----

From: lilyflower@earthlink.net <lilyflower@earthlink.net>  
Sent: Saturday, January 18, 2020 1:36 PM  
To: Board of Supervisors, (BOS) <board.of.supervisors@sfgov.org>  
Subject: # of Police Officers

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

Hello,

My name is Iva Lee of 2600 Union St., SF CA 94123.

For the 1st time in 20 years, my 13-unit building has had 2 incidents in one month.

1) 14 mailboxes vandlized; mailboxes broken open, mail strewn all over the porch. Unknown what mail was taken from which resident. Police responded saying no report will be issued until a "crime" is committed i.e., mail fraud, damage or suspect at hand or video recorded. The same group of vandals walked down the block and did the same to other buildings in the area.

2) Person overturned porch mat to sleep and eat; and started a paper fire. Police came and gave me a report number because of the possible fire that could have ignited the dense trees in front of the building and wood porch.

I believe if more police patrols were visible, these people would not take advantage of the "non-police presence" in the early morning hours.

Sincerely,  
Iva Lee

**From:** [Board of Supervisors, \(BOS\)](#)  
**To:** [BOS-Supervisors](#)  
**Subject:** FW: CPUC - City of San Francisco  
**Date:** Friday, January 10, 2020 2:20:00 PM  
**Attachments:** [CPUC\\_197.pdf](#)

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Hello,

Please see the attached notice from the California Public Utilities Commission.

Thank you,

Eileen McHugh  
Executive Assistant  
Board of Supervisors  
1 Dr. Carlton B. Goodlett Place, City Hall, Room 244  
San Francisco, CA 94102-4689  
Phone: (415) 554-7703 | Fax: (415) 554-5163  
[eileen.e.mchugh@sfgov.org](mailto:eileen.e.mchugh@sfgov.org) | [www.sfbos.org](http://www.sfbos.org)

---

**From:** CPUC Team <[westareacpuc@verizonwireless.com](mailto:westareacpuc@verizonwireless.com)>  
**Sent:** Friday, January 10, 2020 1:55 PM  
**To:** [GO159Areports@cpuc.ca.gov](mailto:GO159Areports@cpuc.ca.gov)  
**Cc:** [westareacpuc@verizonwireless.com](mailto:westareacpuc@verizonwireless.com); [CPC.Wireless <CPC.Wireless@sfgov.org>](mailto:CPC.Wireless@sfgov.org); Administrator, City (ADM) <[city.administrator@sfgov.org](mailto:city.administrator@sfgov.org)>; Board of Supervisors, (BOS) <[board.of.supervisors@sfgov.org](mailto:board.of.supervisors@sfgov.org)>  
**Subject:** CPUC - City of San Francisco

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

CPUC - City of San Francisco

Jan 10, 2020

Consumer Protection and Enforcement Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102  
GO159Areports@cpuc.ca.gov

RE: Notification Letter for SF PAC HEIGHTS 021 - A  
SAN FRANCISCO, CA /GTE Mobilnet California LP

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This is to provide the Commission with notice according to the provisions of General Order No. 159A of the Public Utilities Commission of the State of California ( "CPUC") for the project described in Attachment A.

A copy of this notification letter is also being provided to the appropriate local government agency for its information. Should there be any questions regarding this project, or if you disagree with any of the information contained herein, please contact the representative below.

Verizon Wireless

Ann Goldstein  
Coordinator RE & Compliance - West Territory  
1515 Woodfield Road, #1400  
Schaumburg, IL 60173  
WestAreaCPUC@VerizonWireless.com

JURISDICTION	PLANNING MANAGER	CITY MANAGER	CITY CLERK	DIRECTOR OF SCHOOL BOARD	COUNTY
City of San Francisco	CPC.Wireless@sfgov.org	city.administrator@sfgov.org	Board.of.Supervisors@sfgov.org		San Francisco

VZW Legal Entity	Site Name	Site Address	Tower Design	Size of Building or NA
GTE Mobilnet California LP	SF PAC HEIGHTS 021 - A	2800 Broadway, SAN FRANCISCO , CA94115	Public Lighting Structure	N/A

Site Latitude	Site Longitude	PS Location Code	Tower Appearance	Tower Height (in feet)	Type of Approval	Approval Issue Date
37°47'35.801"N	122°26'35.96"W NAD(83)	414912	Antenna Rad 30.10	32	Zoning	12/20/2018

Project Description: NA oDAS NODE- Pacific Heights oDAS NODE- Pacific Heights

BOS-11

150 Funston Ave  
San Francisco, CA 94118

January 6, 2020

Dear Governor Newsom, Senator Weiner, Assemblyperson Ting, Mayor Breed,  
Supervisor Fewer and the SF Board of Supervisors:

The homeless crisis in San Francisco is horrifying. I feel like I live in a third world country. My 17-year-old son works until 11pm at 5th and Market. I pick him up every night because I feel it's too dangerous for him to wait for a Lyft. Just sitting in the car waiting for him for five minutes is nerve rattling. I don't blame corporations for canceling their conventions here. I don't blame FOX News or Donald Trump (whom I am similarly horrified by) for calling out San Francisco's crisis and the inability of its government to fix it.

This homeless situation is inhumane to the people on the streets. It's dangerous of all of us.

I need you to work with each other. Forget holding out for your perfect idea. Forget battling with each other. You are all good and smart people. Compromise now. Do something now.

Change zoning laws, change tax breaks for landowners with no tenants, use empty store fronts for social services or teacher housing, get aged-out cruise ships to be temporary housing for hundreds of people. Stop walking on egg-shells, be tough. Do something even though it isn't perfect.

I am heartened by the work Senator Weiner is doing, and his genuine efforts to make SB50 a bill that works for all of California. Please support him.

Regarding the specific situation in San Francisco, hurry up before we all leave this city like rats from a sinking ship.

Sincerely,

Anh Oppenheimer

*nose productions @ sbcglobal.net*

RECEIVED  
BOARD OF SUPERVISORS  
SAN FRANCISCO  
2020 JAN 13 PM 3:10

**From:** [Board of Supervisors, \(BOS\)](#)  
**To:** [BOS-Supervisors](#)  
**Subject:** FW: Theater district  
**Date:** Wednesday, January 22, 2020 10:01:00 AM

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**From:** April Scott <[aprscott@gmail.com](mailto:aprscott@gmail.com)>  
**Sent:** Tuesday, January 7, 2020 6:40 PM  
**To:** Board of Supervisors, (BOS) <[board.of.supervisors@sfgov.org](mailto:board.of.supervisors@sfgov.org)>  
**Subject:** Re: Theater district

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

I sent this email almost a year ago. I received a very polite response basically saying "we are trying to address this issue." I must tell you, and this will be of NO surprise.....it is getting WORSE around the Golden Gate Theater. It is beyond atrocious. I recently attended the theatre with my 3 grandsons. How do you explain people defecating on the sidewalk, urinating where they stand, shooting up drugs in front of 11 year olds, heating crack on the edge of the curb? The filth and congestion prohibits even walking on the sidewalk to access our own cars.

Tourism is dropping in SF, and eventually the theatre district will start collapsing. At some point SHN will stop.....I am surprised they haven't done so already! You MUST (!!!) do something immediately! I overheard visitors to SF comment "this is SF??.....we will not come back!" As officials of SF, it is your responsibility to clean up SF and have the city be a place that is a desired destination.

And, just today I was in SF with my same grandsons, visiting Union Square. To drive out, we had to drive by the horror. You can imagine our conversation on the way home. So very sad!

April Scott

On Tue, Apr 16, 2019 at 9:09 AM April Scott <[aprscott@gmail.com](mailto:aprscott@gmail.com)> wrote:

Good day.

I have been an SHN subscriber for years, yet am having serious thoughts about not renewing my subscription. The conditions around the Orpheum and Golden Gate continue to worsen. I no longer feel safe taking my mother or my grandchildren to the theatre.....stepping over feces, needles, filth.....walking around homeless.....dodging garbage. It is disgusting and unnecessary!

I just returned from a week long trip to NYC to visit Broadway theatres. SF could learn A LOT from NYC. The sidewalks are clear and clean. There are not the disgusting items that are so common in SF. The area around the NYC theatres are safe, welcoming, and respectful of the customers and visitors.

San Francisco needs to represent itself in a much better way. What do visitors think that come to the city to see Broadway shows.....it that how we want people to remember the city and our so-called theatre district. It is completely unacceptable. I am surprised that SHN tolerates this mess.

**PLEASE PLEASE PLEASE** remedy this atrocity!!

April Scott

**From:** [Board of Supervisors, \(BOS\)](#)  
**To:** [BOS-Supervisors](#)  
**Subject:** FW: Consent for Refugee Resettlement in San Francisco  
**Date:** Thursday, January 23, 2020 2:45:00 PM  
**Attachments:** [EO Consent for Refugee Resettlement - SFBOS.docx](#)

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**From:** Avi Rose <awrose@jfcs-eastbay.org>  
**Sent:** Monday, January 6, 2020 3:10 PM  
**To:** Board of Supervisors, (BOS) <board.of.supervisors@sfgov.org>  
**Subject:** Consent for Refugee Resettlement in San Francisco

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

Please see the attached letter in reference to an important item on tomorrow's meeting agenda.

Thank you,

**Avi Rose, LCSW** (he/him)  
Executive Director  
JEWISH FAMILY & COMMUNITY SERVICES EAST BAY  
2484 Shattuck Ave., Suite 210  
Berkeley, CA 94704  
(510) 704-7480, ext. 833

1855 Olympic Blvd. , Suite 200  
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[www.jfcs-eastbay.org](http://www.jfcs-eastbay.org)



**JEWISH FAMILY &  
COMMUNITY SERVICES  
EAST BAY**

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Rachel Wick, MPH  
Rabbi Peretz Wolf-Prusan

**Avi Rose**  
Executive Director

[www.jfcs-eastbay.org](http://www.jfcs-eastbay.org)

January 6, 2020

To the attention of the San Francisco County Board of Supervisors:

Together with my colleagues at the International Rescue Committee, I write to you today to seek your written consent to sustain the resettlement of refugees in the City and County of San Francisco, as is now required under Executive Order 13888[1] (EO) issued by President Trump on September 26, 2019. This new EO requires your formal consent for continued refugee resettlement in the county.

In September 2019, President Trump proposed setting the annual target number for refugee admissions at the historically low figure of 18,000. As you know, people have long found refuge in San Francisco, with widespread community support. Refugee resettlement has enriched our community in countless ways, including culturally and economically. Welcoming refugees reflects San Francisco's values as a community that cares for the vulnerable and embraces cultural diversity.

I appreciate the support that you and the mayor have expressed for affirming San Francisco's willingness to welcome refugees. If you have any questions about refugee resettlement, please do not hesitate to reach out. If you have questions about the EO, I recommend that you contact the Department of State at [RefResettlement-PRM@state.gov](mailto:RefResettlement-PRM@state.gov)

Respectfully submitted,

Avi Rose  
Executive Director  
[awrose@jfcs-eastbay.org](mailto:awrose@jfcs-eastbay.org)  
(510) 704-7480 X833

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[1] Although we are communicating with you about the implementation of the EO, communication about, or participation in, the implementation of Executive Order 13888 is not in any way an endorsement of the legality of the EO.

**CONTRA COSTA OFFICE**  
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470 27th Street  
Oakland, CA 94612  
(510) 704-7480, ext. 235

**From:** [Board of Supervisors. \(BOS\)](#)  
**To:** [BOS-Supervisors](#)  
**Subject:** FW: Happy Holidays and Hopes for a SF-DPH New Year's Resolution: Setting a Wireless Effective Radiated Power Limit to Preserve the Quiet Enjoyment of Streets in San Francisco  
**Date:** Thursday, January 23, 2020 2:45:00 PM  
**Attachments:** [Datashet EF6092 EN.pdf](#)

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**From:** Paul McGavin <[paul@mystreetmychoice.com](mailto:paul@mystreetmychoice.com)>  
**Sent:** Tuesday, December 24, 2019 10:36 AM  
**To:** Aragon, Tomas (DPH) <[tomas.aragon@sfdph.org](mailto:tomas.aragon@sfdph.org)>  
**Cc:** Grant Colfax <[Grant.Colfax@sfgov.org](mailto:Grant.Colfax@sfgov.org)>; Fosdahl, Patrick (DPH) <[Patrick.Fosdahl@sfdph.org](mailto:Patrick.Fosdahl@sfdph.org)>; Callewaert, Jennifer (DPH) <[jennifer.callewaert@sfdph.org](mailto:jennifer.callewaert@sfdph.org)>; Duque, Arthur (DPH) <[arthur.duque@sfdph.org](mailto:arthur.duque@sfdph.org)>; Angulo, Sunny (BOS) <[sunny.angulo@sfgov.org](mailto:sunny.angulo@sfgov.org)>; Peskin, Aaron (BOS) <[aaron.peskin@sfgov.org](mailto:aaron.peskin@sfgov.org)>; Safai, Ahsha (BOS) <[ahsha.safai@sfgov.org](mailto:ahsha.safai@sfgov.org)>; Haney, Matt (BOS) <[matt.haney@sfgov.org](mailto:matt.haney@sfgov.org)>; Major, Erica (BOS) <[erica.major@sfgov.org](mailto:erica.major@sfgov.org)>; Hepner, Lee (BOS) <[lee.hepner@sfgov.org](mailto:lee.hepner@sfgov.org)>; DPH, Health Commission (DPH) <[HealthCommission.DPH@sfdph.org](mailto:HealthCommission.DPH@sfdph.org)>; BoardofAppeals (PAB) <[boardofappeals@sfgov.org](mailto:boardofappeals@sfgov.org)>; Rosenberg, Julie (BOA) <[julie.rosenberg@sfgov.org](mailto:julie.rosenberg@sfgov.org)>  
**Subject:** Happy Holidays and Hopes for a SF-DPH New Year's Resolution: Setting a Wireless Effective Radiated Power Limit to Preserve the Quiet Enjoyment of Streets in San Francisco

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December 24, 2018

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Director, Population Health Division (PHD)  
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Rick Swig: President  
Ann Lazarus: Vice President  
Darryl Honda: Commissioner  
Rachael Tanner: Commissioner  
Eduardo Santacana: Commissioner:  
Julie Rosenberg <[julie.rosenberg@sfgov.org](mailto:julie.rosenberg@sfgov.org)>

**Re: Happy Holidays and Hopes for a SF-DPH New Year's Resolution:  
Setting a Wireless Effective Radiated Power Limit to Preserve the Quiet  
Enjoyment of Streets in San Francisco**

Dear Dr. Aragon et al.,

Thank you for calling me back yesterday. I hope you enjoy the holiday break with your family. Please watch this short video -->  
<https://youtu.be/X5lhKHGDkM>

My understanding, from our call yesterday, is that you are now planning to release your update of the [June 14, 2010 Memo SF-DPH Memo](#) by Dr. Rajiv Bhatia re: *Health Effects and Regulation of Wireless Communications Networks* **some time in the first quarter of 2020**, due to the other projects on your plate, including the mid-Jan 2020 deadline for a disaster-preparedness action plan, assigned by your boss, **Dr. Grant Colfax** during the time that the SF-DPH was also charged with completing its RF-EMR update: [July 3, 2013](#) to the present (nearly six months, and counting . . .).

From a January 30, 2019 [press release](#):

San Francisco Mayor London Breed announced that she has chosen **Dr. Grant Colfax** to serve as the new Director of the Department of Public Health (DPH). Dr. Colfax is a national leader on HIV Prevention and was trained at UCSF. He currently serves as Director of Marin County Health and Human Services. He previously worked at DPH as Director of HIV Prevention and Research before leaving to join the Obama White House as the Director of National AIDS Policy.

Mayor Breed said:

"Dr. Colfax knows our City and its challenges, and he is ready to get to work. He knows that we need to get to zero HIV infections in San Francisco and that we need to reach our most vulnerable populations, particularly our African-American and Latino communities who are not seeing their HIV infection rates drop as others do. This means getting everyone — and I mean everyone — access to services, treatment, and preventative medication like PrEP. I know Dr. Colfax will get us to that goal."

Dr. Colfax said:

"I look forward to rejoining the Department of Public Health team and working with the City's diverse communities to ensure all San Franciscans have the opportunity to optimize their health. This work will require effectively addressing the health challenges facing the City, as reflected in Mayor Breed's priorities. This includes improving mental health and substance use treatment services, addressing the medical needs of people experiencing or at risk for homelessness, and reducing health inequities. With the Department's history of innovative public health initiatives, community-driven programming, and superb clinical care system, I am optimistic about what can be achieved."

The continuing delay on updating the 2010 Bhatia memo will be somewhat **difficult for the SF Appeals Board** and Roxanne Stachon (<https://youtu.be/lKEtqSRmt1g?t=1820>), a SF resident who lives at 2730 Broderick St. in San Francisco. On Jan 8, 2020, Ms. Stachon will be arguing a reconsideration of her appeal from 11/20/19 --> <https://scientists4wiredtech.com/action/#sanfrancisco> because the **other** Close Proximity Microwave Radiation Antenna (CPMRA) Appeal that evening was **continued but not hers.**" In the words of SF Appeals president Rick Swig on 11/20/19:

At [1:54:53](#), in the SF Board of Appeals Video from 11/20/19:

**Commissioner Honda** — "I hope in the very near future we 'll get a handle on this 4G and 5G. . . . But at this point, there is nothing that says that we should overturn this particular permit."

**President Swig:** — "My motion would be to continue the item until we had a **clear view** from the Department of Health"

**Commissioner Honda** — "It only takes three votes to pass that motion."

The motion passed 3-2.

You see, Dr. Aragon, the well-being and lives of many San Franciscans ([and the bees!](#)) are in your hands right now. We need you to use your medical judgment to set a **maximum Effective Radiated Power pollution limit**. Such a limit will enable the San Francisco DPH to prohibit Wireless Carriers from pumping excess Effective Radiated Power onto the streets of San Francisco and into the homes of San Franciscans 24/7, year after year. [Why would San Francisco allow any more than the amount of Effective Radiated power that provides Telecommunications service?](#)

A maximum of **0.04 Watts of Effective Radiated Power** from the face of the antenna shroud

1. Provides **5-bars on a cell phone** in a half-mile radius from the antenna,
2. Enables calls and, therefore, does not prohibit Wireless Service
3. Will preserve the quiet enjoyment of streets and interiors of homes in San Francisco **and**
4. Is compliant with the FCC RF-EMR Maximum Public Exposure Guidelines.

**What's not to like about this solution?**

In addition, **24/7 policing** of the Effective Radiated Power limit is **both** feasible and can be paid by the Wireless Carriers. Such policing is easily enabled by City-owned, controlled and maintained fuses on each pole. This is a **revenue-generating** plan for San Francisco that can collect stiff fines from Wireless Carriers for triggering the fuses any time the carriers exceed the City's Effective Radiated Power limit.

[It is time for an effective ERP limit to preserve the quiet enjoyment of San Francisco's streets, as the CA Supreme Court Judges said on 4/4/19:](#)

"travel is not the sole use of public roads; other uses may be incommoded beyond the obstruction of travel. (T-Mobile West, at pp. 355-356.) For example, lines or equipment might

- generate noise,
- cause negative health consequences, or
- create safety concerns.

All these impacts could disturb public road use, or disturb its quiet enjoyment."

Source: <https://scientists4wiredtech.com/2019-ca-supreme-court-decision-t-mobile-v-san-francisco/>

**San Francisco resident Sudi Scull reported the following to me on 12/23/19:**

Sudi felt a real change in her electromagnetic environment about two weeks ago. That is not surprising since AT&T made this announcement on 12/13/19 --> <https://scientists4wiredtech.com/2019/12/att-5g-is-now-live-in-portions-of-ten-us-markets/> and Verizon made this one on 12/23/19 --> <https://scientists4wiredtech.com/2019/12/verizon-5g-now-in-31-cities/>

Sudi feels pulses in her brain and pain in her skin and has had trouble sleeping. She also talked to a family **living 12 feet from one of the 5G poles** in Bernal Heights (at the Northeast corner of York and Montcalm St.) Their young son has had **nosebleeds** and other symptoms for the past two weeks -- not unlike the symptoms reported by the 6-year-old and 3-year-old-girls in Sacramento, living 50 feet from a 4G pole (view <https://youtu.be/qODmlcB4qlo> and read here --> <https://scientists4wiredtech.com/2019/09/truth-about-4g-5g-in-sacramento/> )

These are immediate and short-term effects from exposures to pulsed, data-modulated, Radio-frequency Electromagnetic Microwave Radiation (RF-EMR).

Sudi called Dr. Aragon, yesterday and he said he would send out Arthur Duque (415-252-3966) to measure the levels of this 5G RF-EMR pollution. I told Sudi that Duque lacked the meter probe/antenna to measure above 3,000 MHz. When she called Aragon back, he said that Arthur Duque would measure the Power Flux Density, and Sudi thought that would solve her problem.

I know that SF-DPH had not yet purchased/received the recommended Narda Probe for their Narda NBM-500 meter, so I called Dr. Aragon to tell him about the limitations of the RF meters available in the market. The data sheet for **Narda EF-6092** attached says:

"Measures electric fields from 100 MHz to 60 GHz . . . the probe contains three orthogonally arranged dipoles with detector diodes. The **diode voltages each correspond to the RMS value** of the spatial components."

This probe, unfortunately, was designed to only measure the averages, not the peaks of microwave radiation, which is why I also recommended that the SF-DPH buy this ~\$400 RF-Meter: <https://scientists4wiredtech.com/regulation/safe-and-sound-pro-rf-emr-meter/>

The need to measure peaks of pulsed, data-modulated, Radio-frequency Electromagnetic Microwave Radiation (RF-EMR) is explained here --> <https://youtu.be/AVGHdQGWKdU?t=171>

. . . and here: --> <https://scientists4wiredtech.com/regulation/rf-microwave-exposure-guidelines/>

**Q: Why are SAR measurements meaningless?** (Note: Power Flux Density was derived from SAR)

*Dr. Marino Answer:*

"Several reasons. First you need to understand where SAR came from. I was there when SAR was invented. Richard Phillips, Don Justesen, Saul Michaelson, Herman Schwann, these were men who created SAR, whose mind gave rise to it.

And the reason they did was because they were interested in developing microwave ovens and in understanding how to cook meat. And it's useful for understanding how to cook meat. But it has no application whatsoever, that I have ever seen suggested or advanced, for understanding mobile phones.

SAR works for dead muscle. It has just no applicability in my opinion for live brain."

**Q: Why are SAR measurements not applicable to the live brain?**

*Dr. Marino Answer:*

Because the health hazards associated with mobile phone fields have nothing to do with heat. So it makes no sense to say, "I have a really great way of measuring heat" when the measurement of heat is irrelevant to understanding health hazards. Any measurement that you make that has no connection with what you're interested in is just a waste of time.

SAR can produce a lot of data and when the calculations of SAR are done they can produce beautiful pictures but the pictures are arbitrary and the measurements are meaningless. It's quite clear that that's the case.

The FCC Maximum Permissible Exposure Guideline for pulsed, data-modulated, Radio-frequency Electromagnetic Microwave Radiation (RF-EMR) exposures is, unbelievably, based on only the **RATE** of exposure, **NOT** the **TOTAL DOSE** of poison delivered over time. This has been a scam since day one. The [1986 NCRP Review](#), used to justify this nonsense, defined both Specific Absorption (the total DOSE of radiation in Joules) and Specific Absorption Rate (the RATE of radiation exposure in Watts).

For the FCC MPE RF-EMR exposure guideline, the NCRP picked the latter because "it was easier to measure." . . . hmmm

### **Power Density and SAR Thresholds for Behavioral Disruption**

This, unbelievably, is the basis for our National RF-EMR Exposure Guidelines

<b>Species &amp; Conditions</b>	<b>CW 225 MHz</b>	<b>Pulsed 1,300 MHz</b>	<b>CW 2,450 MHz</b>	<b>Pulsed 5,800 MHz</b>
NR – PFD	n/a	100,000,000 $\mu\text{W}/\text{m}^2$	280,000,000 $\mu\text{W}/\text{m}^2$	200,000,000 $\mu\text{W}/\text{m}^2$
NR – SAR	n/a	2.5 W/kg	5.0 W/kg	4.9 W/kg
SM – PFD	n/a	n/a	450,000,000 $\mu\text{W}/\text{m}^2$	400,000,000 $\mu\text{W}/\text{m}^2$
SM – SAR	n/a	n/a	4.5 W/kg	7.2 W/kg
RM – PFD	80,000,000 $\mu\text{W}/\text{m}^2$	570,000,000 $\mu\text{W}/\text{m}^2$	670,000,000 $\mu\text{W}/\text{m}^2$	1,400,000,000 $\mu\text{W}/\text{m}^2$
RM SAR	3.2 W/kg	4.5 W/kg	4.7 W/kg	8.4 W/kg

#### **Legend**

- **CW** = Continuous Wave | **PFD** = Power Flux Density | **SAR** = Specific

### Absorption Rate

- **NR** = Norwegian Rat | **SM** = Squirrel Monkey | **RM** = Rhesus Monkey

### What was the "Behavioral Disruption?"

- Rats and Monkeys were irradiated with RF-EMR exposures at higher and higher doses, until the lab animals became unresponsive: they could no longer seek and eat their food
- After the animals were this significantly maimed, the scientists then stuck a thermometer up their butts and measured the animals' core body temperature.

The Wireless industry-influenced "professional" measuring equipment essentially ignore the peaks of pulsed, data-modulated, Radio-frequency Electromagnetic Microwave Radiation (RF-EMR) exposures, which is a scam.

>>> On 10/22/19, Paul McGavin wrote to Dr. Tomas Aragon, Patrick Fosdahl, Jennifer Callewaert and Arthur Duque

Recommended Probe for Narda NBM-500: a ~\$10,000 **Narda EF-6092** meters **average  $\mu\text{W}/\text{m}^2$**  from 0.7 V/m to 61.4 V/m (or continuous wave power flux density of 1,300  $\mu\text{W}/\text{m}^2$  to 10,000  $\mu\text{W}/\text{m}^2$ )

<https://www.powerwatch.org.uk/science/unitconversion.asp>

power flux density (PFD) in watts per square meter can be done using the formula:

$$\text{PFD} = (\text{V}/\text{m})^2/377 \text{ watts per metre squared (W}/\text{m}^2)$$

$$\text{e.g. } 58.2 \text{ V}/\text{m (ICNIRP 1800 MHz)} = (58.2*58.2)/377 = 9 \text{ W}/\text{m}^2$$

This conversion is **not particularly relevant** for exposure from mobile phones, and cell tower/base stations/and Wireless Telecommunications Facilities (WTFs) and the **results can be extremely misleading**.

**The problem occurs because PFD is ONLY relevant to heating and it averages** the power over time (6 minutes for official RF PFD measurements). Any PFD has to be integrated over time and most hand-held instruments average over at least a few seconds. Some instruments have a "peak-detect" facility that can give the equivalent power as if the pulsing peak levels were continuous. Note this is not the same as a "max

hold" facility. This is because the normal max hold function on a meter gives you the maximum RMS value measured over the time you have been using the instrument, whereas peak detect measures the level at the top of any pulses in the signal.

The **more** data ransmitted through the air, the **more** Effective Radiated Power and the **more** RF-EMR radiation:

San Francisco needs **an Effective Radiated Power output limit** when CPMRAs are as close as 6 to 12 feet from homes, **as allowed by SF-DPW Article 25** because San Franciscans will be facing an increasingly crowded electromagnetic environment that, at this point, requires basic speed-limit, seat belts and airbags-like **local regulations**. See, below all of the frequencies and wavelengths that San Franciscans will be encountering.

### **The Panoply of Microwave Frequencies/Wavelengths in a 4G/5G World, defined in US Senate Bill 19, The Mobile Now Act**

- **5G:** 600 MHz = waves 20 inches long
- 4G: 700 MHz = waves 17 inches long
- 3G/4G: 800 MHz = waves 15 inches long
- 3G/4G: 900 MHz = waves 13 inches long
- 3G/4G: 1800 MHz = waves 7 inches long
- 3G/4G: 2100 MHz = waves 6 inches long
- Wi-Fi: 2450 MHz = waves 5 inches long (unlicensed)
- **5G:** 3100 MHz to 3550 MHz = waves 3.8 to 3.3 inches long
- **5G:** 3550 MHz to 3700 MHz = waves 3.3 to 3.2 inches long
- **5G:** 3700 MHz to 4200 MHz = waves 3.2 to 2.8 inches long
- **5G:** 4200 to 4900 MHz = waves 2.8 to 2.4 inches long
- Wi-Fi: 5800 MHz = waves 2.0 inches long (unlicensed)
- **5G:** 24,250 to 24,450 MHz = waves 0.5 inch long
- **5G:** 25,050 to 25,250 MHz = waves 0.5 inch long
- **5G:** 25,250 to 27,500 MHz = waves 0.4 inch long
- **5G:** 27,500 to 29,500 MHz = waves 0.4 inch long
- **5G:** 31,800 to 33,400 MHz = waves 0.4 inch long
- **5G:** 37,000 to 40,000 MHz = waves 0.3 inch long
- **5G:** 42,000 to 42,500 MHz = waves 0.3 inch long
- **5G:** 57,000 to 64,500 MHz = waves 0.3 inch long (unlicensed)
- **5G:** 64,000 to 71,000 MHz = waves 0.2 inch long
- **5G:** 71,000 to 76,000 MHz = waves 0.2 inch long

- **5G:** 81,000 to 86,000 MHz = waves 0.1 inch long

--

Regards,

**Paul McGavin**

[My Street, My Choice](#)

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E-FIELD PROBE

EF6092

# Measuring electric fields from 100 MHz to 60 GHz

using instruments in the NBM-500 family

- ▲ **General public and occupational field exposure**
- ▲ **Broad frequency range with high dynamic range**
- ▲ **Isotropic (non-directional) measurement**

The probe contains three orthogonally arranged dipoles with detector diodes. The diode voltages each correspond to the RMS value of the spatial components. The isotropic measurement result is obtained by addition within the probe.

## APPLICATIONS

The probe detects electric fields from 100 MHz up to 60 GHz. This frequency range covers almost the entire range of high frequency communications, right up to mobile radio and satellite links. The linearity and sensitivity of the probe ensure its suitability for checking human safety limit values in the occupational and general public environments.

## PROPERTIES

The probe is designed with mechanical and electrical properties ideal for field use. The probe head is made of foam material to provide effective protection for the sensors, while having excellent RF characteristics. The detector elements are also largely protected against overload, since their destruction limit is well above all the human safety limit values.

## CALIBRATION

The probe is calibrated at several frequencies. The correction values are stored in an EPROM in the probe and are automatically taken into account by the NBM instrument. Calibrated accuracy is thus obtained regardless of the combination of probe and instrument.



## SPECIFICATIONS <sup>a</sup>

Probe EF6092	Electric (E-)Field	
Frequency range <sup>(b)</sup>	100 MHz to 60 GHz	
Type of frequency response	Flat	
Measurement range	0.7 to 400 V/m (CW) 0.7 to 61.4 V/m (True RMS)	130 nW/cm <sup>2</sup> to 42 mW/cm <sup>2</sup> (CW) 130 nW/cm <sup>2</sup> to 1 mW/cm <sup>2</sup> (True RMS)
Dynamic range	55 dB	
CW damage level	1600 V/m	700 mW/cm <sup>2</sup>
Peak damage level <sup>(c)</sup>	1900 V/m	1 W/cm <sup>2</sup>
Sensor type	Diode based system	
Directivity	Isotropic (Tri-axial)	
Readout mode / spatial assessment	Combined 3-axis (RSS)	
<b>UNCERTAINTY</b>		
Flatness of frequency response <sup>(d)</sup> Calibration uncertainty not included	±3 dB (300 MHz to 40 GHz) +3/-6 dB (100 MHz to 60 GHz)	
Calibration uncertainty <sup>(e)</sup> @ 0.2 mW/cm <sup>2</sup> (27.5 V/m)	±0.8 dB (≤ 300 MHz) ±1.5 dB (300 MHz to 1.2 GHz) ±1.3 dB (≥ 1.2 GHz to 60 GHz)	
Linearity Referred to 0.2 mW/cm <sup>2</sup> (27.5 V/m)	±3 dB (1 to 2 V/m) ±1 dB (2 to 250 V/m) ±2 dB (250 to 400 V/m)	±3 dB (0.26 to 1 μW/cm <sup>2</sup> ) ±1 dB (1 μW/cm <sup>2</sup> to 16.5 mW/cm <sup>2</sup> ) ±2 dB (16.5 mW/cm <sup>2</sup> to 42 mW/cm <sup>2</sup> )
Isotropic response <sup>(f)</sup>	±1.25 dB (< 10 GHz) ±2 dB (10 GHz to 26.5 GHz) ±2 dB typ. (> 26.5 GHz)	
Temperature response	±0.9 dB (-0.03 dB/K) @ f = 2.45 GHz	
<b>GENERAL SPECIFICATIONS</b>		
Calibration frequencies	100/ 200/ 300/ 500/ 750 MHz 1/ 1.8/ 2.45/ 3/ 4/ 5/ 6/ 8.2/ 10/ 11/ 18/ 26.5/ 40/ 45.5/ 60 GHz	
Recommended calibration interval	24 months	
Temperature range		
Operating	-10 °C to +50 °C	
Non-operating (transport)	-40 °C to +70 °C	
Humidity	5 to 95 % RH @ ≤ 28 °C	≤ 26 g/m <sup>3</sup> absolute humidity
Size	318 mm x 66 mm Ø	
Weight	90 g	
Compatibility	NBM-500 series meters	
Country of origin	Germany	

(a) Unless otherwise noted specifications apply at reference condition: device in far-field of source, ambient temperature 23±3 °C, relative air humidity 40 % to 60 %, sinusoidal signal

(b) Cutoff frequency at approx. -6 dB

(c) Pulse length 1μsec, duty cycle 1:100

(d) Frequency response can be compensated for by the use of correction factors stored in the probe memory

(e) Accuracy of the fields generated to calibrate the probes

(f) Uncertainty due to varying polarization (verified by type approval test for meter with probe). Ellipse ratio included and calibrated for each probe

## ORDERING INFORMATION

	Part number
Probe EF6092, E-field for NBM, 100 MHz – 60 GHz, isotropic	2402/17B
Probe EF6092, E-field, ACC - with accredited (DAkkS) calibration up to 18 GHz, basic unit required	2402/17B/ACC

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**From:** [Board of Supervisors \(BOS\)](#)  
**To:** [BOS-Supervisors](#)  
**Subject:** FW: Scientific papers re: hazardous exposures from the peaks of pulsed, data-modulated RF-EMR exposures  
**Date:** Thursday, January 23, 2020 2:45:00 PM  
**Attachments:** [image.png](#)

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**From:** Paul McGavin <[paul.mcgavin@scientists4wiredtech.com](mailto:paul.mcgavin@scientists4wiredtech.com)>  
**Sent:** Thursday, December 26, 2019 1:17 PM  
**To:** Aragon, Tomas (DPH) <[tomas.aragon@sfdph.org](mailto:tomas.aragon@sfdph.org)>  
**Cc:** Colfax, Grant (DPH) <[grant.colfax@sfdph.org](mailto:grant.colfax@sfdph.org)>; Fosdahl, Patrick (DPH) <[Patrick.Fosdahl@sfdph.org](mailto:Patrick.Fosdahl@sfdph.org)>; Callewaert, Jennifer (DPH) <[jennifer.callewaert@sfdph.org](mailto:jennifer.callewaert@sfdph.org)>; Duque, Arthur (DPH) <[arthur.duque@sfdph.org](mailto:arthur.duque@sfdph.org)>; Peskin, Aaron (BOS) <[aaron.peskin@sfgov.org](mailto:aaron.peskin@sfgov.org)>; Angulo, Sunny (BOS) <[sunny.angulo@sfgov.org](mailto:sunny.angulo@sfgov.org)>; Hepner, Lee (BOS) <[lee.hepner@sfgov.org](mailto:lee.hepner@sfgov.org)>; Safai, Ahsha (BOS) <[ahsha.safai@sfgov.org](mailto:ahsha.safai@sfgov.org)>; Haney, Matt (BOS) <[matt.haney@sfgov.org](mailto:matt.haney@sfgov.org)>; Major, Erica (BOS) <[erica.major@sfgov.org](mailto:erica.major@sfgov.org)>; DPH, Health Commission (DPH) <[HealthCommission.DPH@sfdph.org](mailto:HealthCommission.DPH@sfdph.org)>; BoardofAppeals (PAB) <[boardofappeals@sfgov.org](mailto:boardofappeals@sfgov.org)>; Rosenberg, Julie (BOA) <[julie.rosenberg@sfgov.org](mailto:julie.rosenberg@sfgov.org)>; Noah Davidson <[5GAwarenessNow@gmail.com](mailto:5GAwarenessNow@gmail.com)>; Ron Rattner <[ronrattner@gmail.com](mailto:ronrattner@gmail.com)>; Cheryl Hogan <[chogan3@gmail.com](mailto:chogan3@gmail.com)>; Michael LeVesque <[michael@rayguardprotect.com](mailto:michael@rayguardprotect.com)>  
**Subject:** Scientific papers re: hazardous exposures from the peaks of pulsed, data-modulated RF-EMR exposures

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December 26, 2019

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Rachael Tanner: Commissioner  
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**Subject: Scientific papers re: hazardous exposures from the peaks of pulsed, data-modulated RF-EMR exposures**

Dear Dr. Aragon:

The scientific papers on hazardous exposures from pulsed, data-modulated, Radio-frequency Electromagnetic Microwave Radiation (RF-EMR) **at levels that are many thousands of times lower than** the FCC RF-EMR exposure guidelines (the one quoted below is a Nov 2019 paper in the journal, *Environmental Research*) keep stacking up . . . and add to the **substantial written evidence** that was first presented to the SF- DPH **back in May/June 2019** by San Francisco resident Cheryl Hogan via her appeal to the SF Board of Appeals (the black binder shown by President Swig here --> [https://youtu.be/QR0\\_f3\\_wqSA?t=971](https://youtu.be/QR0_f3_wqSA?t=971)-- the **very binder** I saw in your office on 10/22/19. More information about Hogan's Appeal is here --> <https://scientists4wiredtech.com/sanfrancisco/sf-appeal-18wr-0171/>

In Sacramento, in early 2019, a three-year-old child and a six-year-old child became ill after two weeks of exposure to 4G RF-EMR exposures from an Amphenol Antenna ([CUUT360X12](#)) that was installed 50 feet from their bedroom. These girls have been medically diagnosed with Electromagnetic Sensitivity, which is an environmentally-induced illness. The treatment is removing RF-EMR exposures from their environment. **Translation:** shut down and move the cell tower that was operating in front of their house. --

> <https://scientists4wiredtech.com/2019/09/truth-about-4g-5g-in-sacramento/> Drs. Aragon and Colfax, I know these people. **Would you like to talk to them?**

Dr Aragon, what are you doing about the following hazardous/**endangering condition in San Francisco** that I reported to you on or around 11/26/19? Also, what are you doing about the hazardous/endangering condition that I reported to you on or around 12/23/19: another family in San Francisco is "**living 12 feet from one of the 5G poles** in Bernal Heights (at the Northeast corner of York and Montcalm St.) Their young son has had **nosebleeds** and other symptoms for the past two weeks."

What medical judgements are you, Dr. Colfax and Dr. Aragon, exercising (or not exercising) by **not immediately correcting** the environmentally-induced endangering conditions that have been reported to you?

**Please tell us the steps you are taking** . . . and no, measuring with an RF-Meter/Probe combination (Narda 550 meter + Narda EF-6092 Probe) that is ill-designed to give an accurate picture of the **micro-second peaks** of pulsed, data-modulated, Radio-frequency Electromagnetic Microwave Radiation (RF-EMR) exposures from 4G and 5G antennas transmitting **RF-EMR pollution from 600 MHz to 86,000 MHz** -- is **not enough**.

In short, in the face of the **established scientific evidence that we have already entered into the San Francisco public record -- months ago** -- there is **no medical basis for inaction** by the SF-DPH. Indeed the 2003 SF Precautionary Principle instructs the SF-DPH **exactly what to do**. **Power off these endangering antennas** while you complete your study and your update of the [June 14, 2010 Memo SF-DPH Memo](#) by Dr. Rajiv Bhatia re: *Health Effects and Regulation of Wireless Communications Networks*.

In San Francisco, an **identical Amphenol antenna** to that installed in Sacramento was installed just **12 feet from this poor girl's bedroom window**. The Wolberger family in San Francisco is facing a similar problem. This **endangering antenna** was installed **after** we informed San Francisco in the Public Record about Verizon's and SF-DPW's and/or SF-PUC's NEPA non-compliance on 11/20/19.



As the **FCC now clearly understands** (as we discussed these installations in my 30-minute call with the three senior FCC attorneys in my 12/12/19 call) **San Francisco has a real problem on its hands**. the following comments entered into the City of Sonoma Public record on 9/12/19, by a Professional RF Engineer hired by many cities to advise them (Monterey, Sonoma and Napa come to mind), **are even more evidence** of the **duties of the San Francisco Department of Health** -- to protect residents from the environmentally-induced condition of microwave radiation sickness --> <https://scientists4wiredtech.com/sanfrancisco/#medical>

Lee Afflerbach from [CTC Technology and Energy](#) states at 3:10:24 in the video —> <https://youtu.be/HRYFXx7oNN4?t=3h10m24s>

"many people are [wirelessly] streaming video and other services like that . . . **each [small] cell is capable of almost putting out the same energy as one macro cell.**"

Lee Afflerbach from [CTC Technology and Energy](#) states at 3:13:22 in the video —> <https://youtu.be/HRYFXx7oNN4?t=3h13m22s>

". . . my staff has probably reviewed several hundred of these small cells in the last year . . . and they are all 4G . . . The radios that they are using are the **exact same radios that are up on the macro towers**. It's not a different technology . . . **the same boxes as on macro towers. I see them all the time.**"

**[Mountains of Scientific Studies that have been/will be entered into the San Francisco Public Record:](#)**

1. <https://www.saferemr.com/2016/06/index.html>
2. <https://magdahavas.com/introduction-to-from-zorys-archive/> and <https://magdahavas.com/category/from-zorys-archive/>
3. <https://mdsafetech.org/science/>
4. <https://bioinitiative.org/research-summaries/>
5. <https://bioinitiative.org/rf-color-charts/>

6. <https://www.emf-portal.org/en>

The following is just one recent paper . . . **Environmental Research, Nov 29 2019, 108845**

<https://www.sciencedirect.com/science/article/abs/pii/S0013935119306425?via%3Dihub>

#### Highlights

- Cellular phone networks demand widespread human exposure to radio-frequency radiation (RFR).
- Cellular phone base stations density & power output increasing global human RFR exposure.
- Already enough medical-scientific evidence to warrant long-term liability.
- To protect cell phone tower firms, **companies should seek to minimize human RFR exposure.**

#### Abstract

The use of cellular phones is now ubiquitous through most of the adult global population and is increasingly common among even young children in many countries (e.g. Finland, where the market for smart phones is nearly saturated). The basic operation of cellular phone networks demands widespread human exposure to radio-frequency radiation (RFR) with cellular phone base stations providing cellular coverage in most areas. As the data needs of the population increase from the major shift in the source of Internet use from personal computers to smart phones, this coverage is widely predicted to increase. Thus, both the density of base stations and their power output is expected to increase the global human RFR exposure. Although direct causation of negative human health effects from RFR from cellular phone base stations has not been finalized, there is already enough medical and scientific evidence to warrant long-term liability for companies deploying cellular phone towers. In order to protect cell phone tower firms from the ramifications of the failed paths of other industries that have caused unintended human harm (e.g. tobacco) this Current Issue summarizes the peer-reviewed literature on the effects of RFR from cellular phone base stations. Specifically the impacts of siting base stations are closely examined and recommendations are made for companies that deploy them to minimize their potential future liability.

--

Regards,

**Paul McGavin**

[Scientists For Wired Technology](#)

work: 707-559-9536

text: 707-939-5549

skype: paulmcgavin

**From:** [Board of Supervisors. \(BOS\)](#)  
**To:** [BOS-Supervisors](#)  
**Subject:** FW: Follow Up on 12/26/19 Request for Answers  
**Date:** Thursday, January 23, 2020 3:17:00 PM  
**Attachments:** [2019-1204-Dr-Gunnar-Hueser Medical-Opinion.pdf](#)  
[2019-1224-Davis-CA-sWTF-Cease-and-Desist Letter.pdf](#)

---

**From:** Paul McGavin <[paul@mystreetmychoice.com](mailto:paul@mystreetmychoice.com)>  
**Sent:** Friday, December 27, 2019 10:13 AM  
**To:** Aragon, Tomas (DPH) <[tomas.aragon@sfdph.org](mailto:tomas.aragon@sfdph.org)>  
**Cc:** Colfax, Grant (DPH) <[grant.colfax@sfdph.org](mailto:grant.colfax@sfdph.org)>; Fosdahl, Patrick (DPH) <[Patrick.Fosdahl@sfdph.org](mailto:Patrick.Fosdahl@sfdph.org)>; Callewaert, Jennifer (DPH) <[jennifer.callewaert@sfdph.org](mailto:jennifer.callewaert@sfdph.org)>; Duque, Arthur (DPH) <[arthur.duque@sfdph.org](mailto:arthur.duque@sfdph.org)>; Peskin, Aaron (BOS) <[aaron.peskin@sfgov.org](mailto:aaron.peskin@sfgov.org)>; Angulo, Sunny (BOS) <[sunny.angulo@sfgov.org](mailto:sunny.angulo@sfgov.org)>; Hepner, Lee (BOS) <[lee.hepner@sfgov.org](mailto:lee.hepner@sfgov.org)>; Safai, Ahsha (BOS) <[ahsha.safai@sfgov.org](mailto:ahsha.safai@sfgov.org)>; Haney, Matt (BOS) <[matt.haney@sfgov.org](mailto:matt.haney@sfgov.org)>; Major, Erica (BOS) <[erica.major@sfgov.org](mailto:erica.major@sfgov.org)>; DPH, Health Commission (DPH) <[HealthCommission.DPH@sfdph.org](mailto:HealthCommission.DPH@sfdph.org)>; BoardofAppeals (PAB) <[boardofappeals@sfgov.org](mailto:boardofappeals@sfgov.org)>; Rosenberg, Julie (BOA) <[julie.rosenberg@sfgov.org](mailto:julie.rosenberg@sfgov.org)>  
**Subject:** Follow Up on 12/26/19 Request for Answers

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December 27 , 2019

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Rachael Tanner: Commissioner  
Eduardo Santacana: Commissioner  
Julie Rosenberg <[julie.rosenberg@sfgov.org](mailto:julie.rosenberg@sfgov.org)>

Dear Dr. Aragon et al.

[Erica Major, will you please place this email (as well as all of the previous emails I have cc'ed to you) into the San Francisco Public Record regarding two pending items of San Francisco business: [1] the update of the [June 14, 2010 Memo SF-DPH Memo](#) by Dr. Rajiv Bhatia re: *Health Effects and Regulation of Wireless Communications Networks* and [2] To rescind and further amend the July 2018 changes to SF-DPW Article 25. **Thank you for doing so.**]

As a follow up to my 12/26/19 email, I have located and posted the full text and references for **Cell Tower Siting Requires Careful Planning / Paper: Limiting Liability By Siting Cell Towers to Minimize Negative Health Effects** here--> <https://scientists4wiredtech.com/2019/12/cell-tower-siting-requires-careful-planning/>

Please also find the following attached:

- **2019-1204-Dr-Gunnar-Hueser Medical-Opinion.pdf** (attached) -- re the three-year old and six-year old children negatively affected by the Verizon small Wireless Telecommunications Facilities (sWTF) installed in front of their home --> <https://scientists4wiredtech.com/2019/09/truth-about-4g->

[5g-in-sacramento/](#)

- **2019-1224-Davis-CA-sWTF-Cease-and-Desist Letter.pdf** (attached) -- three cities, to date, have received such letters: Davis, Napa and Berkeley. More are expected, shortly.

We are expecting and still waiting for answers from Drs. Colfax and Aragon . . .

>>> Paul McGavin wrote on 12/26/2019 2:25 PM:

What medical judgements are you, Dr. Colfax and Dr. Aragon, exercising (or not exercising) by not immediately correcting the environmentally-induced endangering conditions that have been reported to you?

Please tell us the steps you are taking.

I must note, Dr. Aragon I have received **exactly zero email responses** from you since we met on 10/22/19, when I first reported such endangering RF-EMR exposure conditions to you.

The evidence entered into the San Francisco public record, including established science re: the negative health consequences from exposures to pulsed, data-modulated, Radio-frequency Electromagnetic Microwave Radiation (RF-EMR) will continue to grow . . .

. . . when will we hear back from the San Francisco staff and elected representatives responsible for these serious matters?

Now that 5G has "officially launched" in San Francisco . . .

- <https://scientists4wiredtech.com/2019/12/att-5g-is-now-live-in-portions-of-ten-us-markets/>
- <https://scientists4wiredtech.com/2019/12/verizon-5g-now-in-31-cities/>

. . . the irreparable harms are already occurring and people are actively moving out of San Francisco, since they no longer have quiet enjoyment in their own homes.

**We need some answers very soon.** Answers **now** would be appropriate.

--

Regards,

**Paul McGavin**

[My Street, My Choice](#)

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text: 707-939-5549

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Fellow, American College of Physicians  
Fellow, American EEG Society

Diplomate (McGill University), Internal Medicine  
Diplomate, American College of Forensic Examiners

---

**NEUROTOXICOLOGY**

---

**IMMUNOTOXICOLOGY**

December 4, 2019

Re: [REDACTED]

To Whom It May Concern:

I have carefully reviewed the available medical and also personal history and have also personally met and evaluated the above named two girls on December 4, 2019.

In late December of 2018, a Verizon small cell antenna was installed 60 feet away from the girls' bedroom window. The antenna which has a 360-degree radiation pattern is emitting microwave radiation directly into their bedroom. Approximately one month after the antenna installation the girls began experiencing cold/flu like symptoms with a persistent cough. By the end of February, 2019, [REDACTED] were still ill with the same symptoms. They had also begun to experience sleep disturbances, occasional headaches, and chronic fatigue. Other

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members of the family were also experiencing unusual symptoms since the antenna had been installed. Multisystem complaints continued until the girls were relocated to a safer area of the house.

In late March a careful and detailed study of exposure was performed by Eric Windheim of EMF Solutions and completed on June 2, 2019. This convincingly documents exposure to harmful electromagnetic fields. Eric Windheim writes "Your measured levels of RFR are highly toxic, hazardous and dangerous to all residents, guests and pets at your home". Shielding was recommended and performed. It led to a significant improvement of symptoms in both girls. Although [REDACTED] still is experiencing more frequent cold/flu symptoms roughly once per month since before exposure when she was only having cold/flu symptoms no more than once or twice a year. Both [REDACTED] still have occasional sleep disturbances.

After the above review of their histories, personal consultation, and the report of Eric Windheim, I concluded that both girls suffered from toxic encephalopathy which specifically includes Electromagnetic Sensitivity (EMS). These symptoms were caused by exposure to the installed small cell antenna.

The primary treatment for Electromagnetic Sensitivity is avoidance of man-made non-ionizing radiation sources. It is my professional opinion and strong recommendation that the antenna outside the [REDACTED] home be permanently turned off or relocated in order to no longer impair [REDACTED]'s health and quality of life.

My opinion is based on experience with several thousand patients with toxic encephalopathy and several hundred patients with Electrohypersensitivity (EHS) and/or EMF Sensitivity, review of the pertinent literature, and discussion with national and international experts in the field. My opinion is also supported by peer reviewed publications of mine.

A number of years ago I studied 6 firefighters all of whom had been exposed to just 2G cell phone tower emissions and had developed impairment of function as a result. All of their brain scans were definitely abnormal. This study is now being prepared for publication.

Below are listed a number of pertinent publications showing abnormalities of brain function after exposure to electromagnetic fields.

My Curriculum Vitae may be viewed and downloaded on my website: [emfdoc.com](http://emfdoc.com).

A handwritten signature in black ink, appearing to read 'G Heuser', with a stylized flourish extending to the right.

Gunnar Heuser MD

### Pertinent Publications (from my C.V.)

45. Heuser, G.; Mena, I. NeuroSPECT in Neurotoxic Chemical Exposure. Demonstration of Long Term Functional Abnormalities. *Toxicology and Industrial Health*, 14, #6: 813-827, 1998.

48. Bartha, L.; et al. Multiple Chemical Sensitivity: A 1999 Consensus. *Arch. Environ Hlth*, 54:147-149, 1999.

50. Heuser, G., Axelrod, P., Heuser, S.: Defining Chemical Injury: A Diagnostic Protocol and Profile of Chemically Injured Civilians, Industrial Workers and Gulf War Veterans. *International Perspectives in Public Health*. 13:1-27, 2000.

51. Heuser, G., Wu, J.C. Deep Subcortical (incl. limbic) Hypermetabolism in Patients with Chemical Intolerance. *Human PET Studies. Annals of the New York Academy of Sciences*, 933:319-322, 2001.

56. Heuser, G., Aguilera, O., Heuser, S., Gordon, R. Clinical Evaluation of Flight Attendants after Exposure to Fumes in Cabin Air. *The Journal of Occupational Health and Safety (Australia and New Zealand)* 21 (5) 455-459. October 2005.

61. Heuser, G., Heuser, SA. Functional brain MRI in patients complaining of electrohypersensitivity after long term exposure to electromagnetic fields. *Reviews on Environmental Health*. Published online July 5, 2017. **DOI 10.1515/reveh-2017-0014**

62. Heuser, G., Heuser, SA. Corrigendum to: Functional brain MRI in patients complaining of electrohypersensitivity after long term exposure to electromagnetic fields. *Reviews on Environmental Health*. Published 2017; 32(4):379-380. (DOI 10.1515/reveh-2017-0027)

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December 24, 2019

To City of Davis Council Members:

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Council Member Will Arnold <warnold@cityofdavis.org>

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City of Davis

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Re: Notice of cease and desist from processing applications and issuing encroachment permits pertaining to 4G and 5G "small" wireless telecommunications facilities and from any installation and operations thereof, as noncompliant with the 8/9/19 D.C. Circuit Court of Appeals unanimous ruling in case No.18-1129.

**CEASE AND DESIST DEMAND**

Sent by email and USPS

Dear Mayor Brett Lee and Davis City Council, City Manager Michael Webb, Assistant City Managers Ashley Feeney and Kelly Stachowicz, and City Attorney Inder Khalsa:

Our law firm represents the Davis Anti-5G Microwave Network. We forward this demand on their behalf.

This is your third letter of notification to cease and desist on all 4G and 5G applications. The first letter you received is entitled, "Request for Toll Agreement on Shot Clocks Regarding All 5G/4G "Small" Wireless Telecommunication Facilities Pending Receipt of Environmental Assessment et al." dated and received on November 1, 2019, and the second letter entitled "Notice of Appellate Decision relevant to, and Notice of Cease and Desist from, Processing and Approving Applications pertaining to all 5G/4G "Small Wireless Telecommunications Facilities" (sWTF), and from any placement, construction, modification and operations thereof, as non-compliant with 8/9/19 Ruling in Case 18-1129" dated and received on November 29, 2019.

The City of Davis has been receiving a steady stream of applications from telecommunications industries to install and operate, to date, thirteen wireless telecommunications facilities (WTFs) in our town as part of the 4G and 5G federal undertaking branded as "small cells" by the wireless industry, on municipal facilities, including streetlight and utility poles, in the public right-of-way, and are property of the municipality.

This correspondence advises you that the D.C. Circuit Court of Appeals in its unanimous 8/9/19 ruling in case No. 18-1129, a copy of which is attached hereto, vacated the portion of Federal Communications Commission (FCC) Order 18-30 that exempted "small" cells from environmental review under the National Environmental Policy Act (NEPA) and historic-preservation review under the National Historic Preservation Act (NHPA), and remanded the matter to the FCC.

The D.C. Circuit judges presented the following reasons for the ruling:

The FCC failed to "adequately address possible harms of deregulation and benefits of environmental and historic-preservation review. The Order's deregulation of small cells [was] thus arbitrary and capricious."

"The Commission did not adequately address the harms of deregulation or justify its portrayal of those harms as negligible."

The FCC Order "[did] not justify the Commission's determination that it was not in the public interest to require review of small cell deployments. In particular, the Commission failed to justify its confidence that small cell deployments pose little to no cognizable religious, cultural, or environmental risks, particularly given the vast number of proposed deployments."

The scale of the deployment the FCC seeks to facilitate ... [made] it impossible ... to credit the claim that small cell deregulation [would] 'leave little to no environmental footprint.'"

"In light of its mischaracterization of small cells' footprint, the scale of the deployment it anticipates, the many expedients already in place for low-impact wireless construction, and the Commission's decades-long history of carefully tailored review, the FCC's characterization of the Order as consistent with its longstanding policy was not 'logical and rational.'"

The anticipated nationwide deployment of approximately 800,000 "small" WTFs by 2026 is clearly a federal undertaking, because the wireless industry licenses its wireless spectrum frequencies from the federal government. That makes every "small" WTF planned for the City of Davis a part of this federal undertaking.

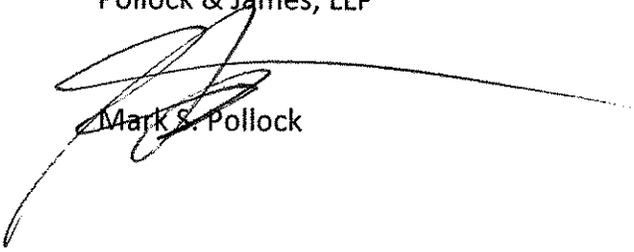
Therefore, this 8/9/19 DC Circuit Court ruling renders every "small" WTF application in the City of Davis incomplete, stopping all shot-clocks, because the FCC has not yet addressed the remanded issue. The Court set expectations that the FCC write rules specific for "small" WTFs as a "class" that address the need for the FCC to complete environmental review for the anticipated nationwide rollout of "small" WTFs.

This letter, therefore, demands that the City of Davis cease and desist from: the processing of any and all "small" WTF applications, current and in the future, the approval of any and all encroachment permits for "small" WTFs, and the construction, placement, and operation of any and all "small" WTFs.

Promptly notify Verizon, ATT, Sprint, Crown Castle, Nexius, and any other applicants that until they place substantial written evidence in the public record, proving that the FCC has written rules specific to "small" WTFs "as a class" and has completed any required environmental and historical-preservation review for the anticipated nationwide deployment of an 800,000-unit network of "small" WTFs, their applications for any "small" WTFs in Davis are incomplete as a matter of law. In connection with the above-ceased activities, you may wish to inform them of the DC Circuit Court case No. 18-1129 ruling, requiring the FCC to revert back to previous rules, making these installations subject to NEPA and NHPA review.

Kindly inform me of your intent to cease and desist from the above-listed activities.

Sincerely,  
Pollock & James, LLP



Mark S. Pollock

United States Court of Appeals  
FOR THE DISTRICT OF COLUMBIA CIRCUIT

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Argued March 15, 2019

Decided August 9, 2019

No. 18-1129

UNITED KEETOOWAH BAND OF CHEROKEE INDIANS IN  
OKLAHOMA, INDIVIDUALLY AND ON BEHALF OF ALL OTHER  
NATIVE AMERICAN INDIAN TRIBES AND TRIBAL  
ORGANIZATIONS, ET AL.,  
PETITIONERS

v.

FEDERAL COMMUNICATIONS COMMISSION AND UNITED  
STATES OF AMERICA,  
RESPONDENTS

NATIONAL ASSOCIATION OF TRIBAL HISTORIC PRESERVATION  
OFFICERS, ET AL.,  
INTERVENORS

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Consolidated with 18-1135, 18-1148, 18-1159, 18-1184

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On Petitions for Review of an Order of  
the Federal Communications Commission

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*Stephen Díaz Gavin* argued the cause for petitioners United Keetoowah Band of Cherokee Indians in Oklahoma, et al., and supporting intervenors. With him on the briefs were *J. Scott Sypolt, Joel D. Bertocchi, Joseph H. Webster, F. Michael*

*Willis, Andrew Jay Schwartzman, James T. Graves, and Elizabeth S. Merritt. Angela J. Campbell* entered an appearance.

*Sharon Buccino* argued the cause for petitioner Natural Resources Defense Council and intervenor Edward B. Myers. With her on the briefs was *Edward B. Myers*.

*Natalie A. Landreth* argued the cause for petitioners Blackfeet Tribe, et al. With her on the briefs were *Wesley J. Furlong, Joel West Williams, Troy A. Eid, Jennifer H. Weddle, and Heather D. Thompson*.

*Jacob M. Lewis*, Associate General Counsel, Federal Communications Commission, argued the cause for respondents. With him on the brief were *Jeffrey Bossert Clark*, Assistant Attorney General, U.S. Department of Justice, *Eric A. Grant*, Deputy Assistant Attorney General, *Andrew C. Mergen* and *Allen M. Brabender*, Attorneys, *Thomas M. Johnson Jr.*, General Counsel, Federal Communications Commission, *David M. Gossett*, Deputy General Counsel, and *C. Grey Pash Jr.*, Counsel. *Jonathan H. Laskin* and *Robert B. Nicholson*, Attorneys, U.S. Department of Justice, and *Richard K. Welch*, Deputy Associate General Counsel, Federal Communications Commission, entered appearances.

*Joshua Turner* argued the cause for intervenors in support of respondents. With him on the brief were *Christopher J. Wright* and *E. Austin Bonner*.

Before: TATEL and PILLARD, *Circuit Judges*, and EDWARDS, *Senior Circuit Judge*.

Opinion for the Court filed by *Circuit Judge PILLARD*.

PILLARD, *Circuit Judge*: Cellular wireless services, including telephone and other forms of wireless data transmission, depend on facilities that transmit their radio signals on bands of electromagnetic spectrum. The Federal Communications Commission (FCC or Commission) has exclusive control over the spectrum, and wireless providers must obtain licenses from the FCC to transmit. Wireless service in the United States has mostly depended on large, “macrocell” radio towers to transmit cell signal, but companies offering the next generation of wireless service—known as 5G—are in the process of shifting to transmission via hundreds of thousands of densely spaced small wireless facilities, or “small cells.” As part of an effort to expedite the rollout of 5G service, the Commission has removed some regulatory requirements for the construction of wireless facilities. These petitions challenge one of the FCC’s orders paring back such regulations, *In re Accelerating Wireless Broadband Deployment by Removing Barriers to Infrastructure Investment (Second Report & Order) (Order)*, FCC 18-30, 2018 WL 1559856 (F.C.C.) (Mar. 30, 2018).

The *Order* exempted most small cell construction from two kinds of previously required review: historic-preservation review under the National Historic Preservation Act (NHPA) and environmental review under the National Environmental Policy Act (NEPA). Together, these reviews assess the effects of new construction on, among other things, sites of religious and cultural importance to federally recognized Indian Tribes. The *Order* also effectively reduced Tribes’ role in reviewing proposed construction of macrocell towers and other wireless facilities that remain subject to cultural and environmental review.

Three groups of petitioners challenge the *Order* as violating the NHPA, NEPA, and the Administrative Procedure

Act on several grounds: that its elimination of historic-preservation and environmental review of small cell construction was arbitrary and capricious, an unjustified policy reversal, and contrary to the NHPA and NEPA; that the changes to Tribes' role in reviewing new construction was arbitrary and capricious; that the Commission arbitrarily and capriciously failed to engage in meaningful consultations with Tribes in promulgating the *Order*; and that the *Order* itself required NEPA review.

We grant in part the petitions for review because the *Order* does not justify the Commission's determination that it was not in the public interest to require review of small cell deployments. In particular, the Commission failed to justify its confidence that small cell deployments pose little to no cognizable religious, cultural, or environmental risk, particularly given the vast number of proposed deployments and the reality that the *Order* will principally affect small cells that require new construction. The Commission accordingly did not, pursuant to its public interest authority, 47 U.S.C. § 319(d), adequately address possible harms of deregulation and benefits of environmental and historic-preservation review. The *Order's* deregulation of small cells is thus arbitrary and capricious. We do not reach the alternative objections to the elimination of review on small cell construction. We deny the petitions for review on the remaining grounds.

## **BACKGROUND**

### **I. Statutory and Regulatory Background**

#### **A. National Historic Preservation Act (NHPA)**

Congress enacted the NHPA to “foster conditions under which our modern society and our historic property can exist

in productive harmony” and “contribute to the preservation of nonfederally owned historic property and give maximum encouragement to organizations and individuals undertaking preservation by private means.” 54 U.S.C. § 300101(1), (4). As part of that mission, NHPA’s Section 106 requires federal agencies to “take into account the effect of” their “undertaking[s] on any historic property.” *Id.* § 306108.

Both “historic property” and “undertaking” have specific meanings under the statute. Historic properties include myriad monuments, buildings, and sites of historic importance, including “[p]roperty of traditional religious and cultural importance to an Indian tribe.” *Id.* §§ 302706, 300308. Insofar as Tribal heritage is concerned, the Section 106 process requires federal agencies to “consult with any Indian tribe . . . that attaches religious and cultural significance to” a historic property potentially affected by a federal undertaking. *Id.* §§ 302706, 306102. To count as “historic,” such properties need not be on Tribal land; in fact, they “are commonly located outside Tribal lands and may include Tribal burial grounds, land vistas, and other sites that Tribal Nations . . . regard as sacred or otherwise culturally significant.” *Order* ¶ 97. Only a federal “undertaking,” not a state or purely private one, triggers the Section 106 Tribal consultation process. A federal “undertaking,” as relevant here, is “a project, activity, or program funded in whole or in part under the direct or indirect jurisdiction of a Federal agency, including . . . those requiring a Federal permit, license, or approval.” 54 U.S.C. § 300320. We have construed the statute to mean that, for an action to be a federal undertaking, “only a ‘Federal permit, license or approval’ is required,” not necessarily federal funding. *CTIA-Wireless Ass’n v. FCC*, 466 F.3d 105, 112 (D.C. Cir. 2006).

The Section 106 process requires that an agency “consider the impacts of its undertaking” and consult various parties, not

that it necessarily “engage in any particular preservation activities.” *Id.* at 107 (quoting *Davis v. Latschar*, 202 F.3d 359, 370 (D.C. Cir. 2000)). The NHPA established an independent agency, the Advisory Council on Historic Preservation (Advisory Council), 54 U.S.C. § 304101, which is responsible for promulgating regulations “to govern the implementation of” Section 106, *id.* § 304108(a). Agencies must consult with the Advisory Council, State Historic Preservation Officers, and Tribal Historic Preservation Officers, the last of which adopt the responsibilities of State Historic Preservation Officers on Tribal lands. 54 U.S.C. §§ 302303, 302702; 36 C.F.R. §§ 800.3(c), 800.16(v)-(w) (defining State and Tribal Historic Preservation Officers).

The Advisory Council’s regulations authorize the use of alternatives to the ordinary Section 106 procedures, called “programmatic agreements.” 36 C.F.R. § 800.14(b). The Commission develops programmatic agreements in consultation with the Advisory Council, Tribes, and other interested parties, “to govern the implementation of a particular program or the resolution of adverse effects from certain complex project situations or multiple undertakings” in certain circumstances, such as when “effects on historic properties are similar and repetitive” or “effects on historic properties cannot be fully determined prior to approval of an undertaking.” *Id.* § 800.14(1)(i)-(ii). Tribes’ views must be taken into account where the agreement “has the potential to affect historic properties on tribal lands or historic properties of religious and cultural significance to an Indian tribe.” *Id.* § 800.14(b)(1)(i), (f). For instance, the Commission has consulted with Tribes to use programmatic agreements to exclude from individualized review entire categories of undertakings that are unlikely to affect historic properties. *See In re Nationwide Programmatic Agreement Regarding the Section 106 [NHPA] Review Process (Section 106 Agreement)*, 20 FCC Rcd. 1073, 1075 ¶ 2 (2004).

## B. National Environmental Policy Act (NEPA)

Congress enacted NEPA to “encourage productive and enjoyable harmony between man and his environment” and “promote efforts which will prevent or eliminate damage to the environment and biosphere and stimulate the health and welfare of man,” among other purposes. 42 U.S.C. § 4321. Like the NHPA, NEPA mandates a review process that “does not dictate particular decisional outcomes, but ‘merely prohibits uninformed—rather than unwise—agency action.’” *Sierra Club v. U.S. Army Corps of Eng’rs*, 803 F.3d 31, 37 (D.C. Cir. 2015) (quoting *Robertson v. Methow Valley Citizens Council*, 490 U.S. 332, 351 (1989)).

All “major Federal actions significantly affecting the quality of the human environment” trigger environmental review under NEPA, just as federal “undertakings” trigger historic preservation review under the NHPA. 42 U.S.C. § 4332(C). Major federal actions “include[] actions . . . which are potentially subject to Federal control and responsibility.” 40 C.F.R. § 1508.18. Under the Commission’s procedures implementing NEPA, if an action may significantly affect the environment, applicants must conduct a preliminary Environmental Assessment to help the Commission determine whether “the proposal will have a significant environmental impact upon the quality of the human environment,” and so perhaps necessitate a more detailed Environmental Impact Statement. 47 C.F.R. § 1.1308; *see also* 40 C.F.R. § 1508.9. If, after reviewing the Environmental Assessment, the Commission determines that the action will not have a significant environmental impact, it will make a “finding of no significant impact” and process the application “without further documentation of environmental effect.” 47 C.F.R. § 1.1308(d).

NEPA also has an analogue to the NHPA's Advisory Council. In enacting NEPA, Congress established the Council on Environmental Quality, in the Executive Office of the President, to oversee implementation of NEPA across the entire federal government. 42 U.S.C. §§ 4342, 4344. With the endorsement of the Council on Environmental Quality and by following a series of mandated procedures, agencies can establish "categorical exclusions" for federal actions that require neither an Environmental Assessment nor an Environmental Impact Statement. 40 C.F.R. § 1508.4. Categorical exclusions are appropriate for "a category of actions which do not individually or cumulatively have a significant effect on the human environment and which have been found to have no such effect in procedures adopted by a Federal agency." *Id.* "Categorical exclusions are not exemptions or waivers of NEPA review; they are simply one type of NEPA review." Council on Environmental Quality, *Memorandum for Heads of Federal Dep'ts and Agencies: Establishing, Applying & Revising Categorical Exclusions under [NEPA] (Categorical Exclusion Memo) 2* (2010).

### **C. Legal Framework for Wireless Infrastructure**

The Communications Act of 1934 established the FCC to make available a "rapid, efficient . . . wire and radio communication service with adequate facilities at reasonable charges." 47 U.S.C. § 151. In licensing use of the spectrum, the Commission is tasked with promoting "the development and rapid deployment of new technologies, products and services for the benefit of the public . . . without administrative or judicial delays," *id.* § 309, and "maintain[ing] the control of the United States over all the channels of radio transmission," *id.* § 301.

The Commission generally does not require construction permits before private parties can build wireless facilities. Congress largely eliminated the FCC's site-specific construction permits in 1982, and the Commission has since required construction permits only where it finds that the public interest would be served by such permitting. *See* Pub. L. 97-259, 96 Stat. 1087, § 119 (1982) (codified at 47 U.S.C. § 319(d)). It has not made such a finding for the wireless facilities at issue here.

The FCC does, however, require licensing of the spectrum used by wireless small cells. It does so by issuing geographic area licenses, which allow wireless providers to operate on certain frequency bands in a wide geographic area. *See* 47 U.S.C. § 309(j). Those licenses authorize using spectrum rather than building wireless facilities, but they necessarily contemplate facility construction. They have coverage requirements—for instance, one type of geographic area license required licensees to provide service to at least 40% of the population in their geographic service area by June 2013. *See* 47 C.F.R. § 27.14(h). If they fail to meet the coverage requirements, they can be stripped of authority to operate for the license's full term or serve part of its geographic area, and they “may be subject to enforcement action, including forfeitures.” *Id.* The Commission also exercises continuing authority to inspect radio installations to ascertain their compliance with any and all applicable laws, whether or not the licensee itself constructed those installations. *See* 47 U.S.C. § 303(n); 47 C.F.R. § 1.9020(c)(5).

The Commission has not identified any period since the enactment of the NHPA (in 1966) and NEPA (in 1970) when it did not require historic-preservation and environmental review of wireless facilities. After Congress eliminated the construction permit requirement, the Commission for a time

required NEPA and NHPA review of facilities before it granted their service licenses. *See, e.g., In re Amendment of Envtl. Rules in Response to New Regulations Issued by [CEQ]*, FCC 85-626, 1986 WL 292182, at \*5 ¶ 18 (F.C.C.) (Mar. 26, 1986) (requiring review “during the period prior to grant of a station license”); *id.* at \*8 App’x ¶ 7 (requiring NEPA review on “[f]acilities that will affect districts, sites, buildings, structures or objects . . . that are listed in the National Register of Historic Places or are eligible for listing,” which includes property of religious or cultural significance to Indian Tribes, 54 U.S.C. § 302706(a)). In 1990, the Commission shifted review from the licensing stage to the construction stage by establishing a “limited approval authority” over construction of wireless facilities. *In re Amendment of Envtl. Rules (1990 Order)*, 5 FCC Rcd. 2942 (1990). Limited approval authority required that, “where construction of a Commission-regulated radio communications facility is permitted without prior Commission authorization (*i.e.*, without a construction permit), the licensee must nonetheless comply with historic preservation and environmental review procedures.” *Order* ¶ 51; *see also* 47 C.F.R. § 1.1312. The authority was “limited” in that it allowed “the Commission [to] exercise[] control over deployment solely to conduct federal historic and environmental review.” Resp’t Br. 12. The Commission emphasized that shifting review to the pre-construction stage served a practical function: Before it had established its limited approval authority, the FCC’s rules “provide[d] that any required submission of [Environmental Assessments] and any required Commission environmental review take place at the licensing stage rather than prior to construction,” with the result that “[a]pplicants who ha[d] already constructed their facilities” could “subsequently be denied licenses on environmental grounds.” *1990 Order* 2942 ¶ 3. The Commission explained that it continued to require review “to ensure that the Commission fully complies with Federal

environmental laws in connection with facilities that do not require pre-construction authorization.” *Id.* ¶ 4. It announced the changes as “necessary to ensure that the Commission addresses environmental issues early enough in the licensing process to ensure that it fully meets its obligations under Federal environmental laws,” including NEPA and the NHPA. *Id.* at 2943 ¶ 9 & n.16.

The Commission has never required individualized review of each separate facility, however. A long series of regulations, programmatic agreements, and categorical exclusions has aggregated facilities for joint consideration and focused NHPA and NEPA review on those deployments most likely to have cultural or environmental effects. For instance, most collocations—deployments on existing structures—are excluded from individualized review under NHPA programmatic agreements and NEPA categorical exclusions. See *In re Implementation of the National Environmental Policy Act of 1969 (Implementation of NEPA)*, 49 F.C.C.2d 1313, 1319-20 (1974); *Nationwide Programmatic Agreement for the Collocation of Wireless Antennas (Collocation Agreement)*, 47 C.F.R. pt.1, app. B (2001); *Section 106 Agreement*, 20 FCC Rcd. at 1075 ¶ 2; *Nationwide Programmatic Agreement for Review Under the National Historic Preservation Act*, 70 Fed. Reg. 556 (2005); *In re Acceleration of Broadband Deployment by Improving Wireless Facilities Siting Policies (Improving Wireless Facilities Siting Policies)*, 29 FCC Rcd. 12865, 12870 ¶ 11 (2014); 47 C.F.R. § 1.1320(b)(4). Categorical exclusions go through notice and comment, 40 C.F.R. § 1507.3; include impact findings, *Categorical Exclusion Memo* 9; require the Council on Environmental Quality to approve them as consistent with its regulations and NEPA, 40 C.F.R. § 1507.3(a); and reserve rights to interested parties to request further review in the event that atypical adverse effects do occur, 47 C.F.R. § 1.1307(c), (d). At the same time, they

achieve enormous efficiencies in the review processes for classes of actions or undertakings anticipated to have minimal or no adverse cultural or environmental effects.

Since 2004, the FCC has been conducting NHPA review in accordance with a broad programmatic agreement, the *Section 106 Agreement*, 20 FCC Rcd. 1073. Interested parties developed that agreement to “tailor the Section 106 review in the communications context in order to improve compliance and streamline the review process for construction of towers and other Commission undertakings, while at the same time advancing and preserving the goal of the NHPA to protect historic properties, including historic properties to which federally recognized Indian tribes . . . attach religious and cultural significance.” *Id.* at 1074-75 ¶ 1. In the *Section 106 Agreement*, the Commission adopted “procedures for participation of federally recognized Indian tribes,” among other changes. *Id.* at 1075 ¶ 2. It also formalized the use of the electronic Tower Construction Notification System, which notifies Tribes of proposed wireless construction in areas they have identified as containing properties of religious and cultural significance, and allows them to give applicants information on the potential effects of proposed construction. *Id.* at 1106-10 ¶¶ 89-100.

## II. Order Under Review

The challenged *Order* eliminated NHPA and NEPA review on small cells that meet certain size and other specifications, based on the Commission’s conclusion that such review was not statutorily required and would impede the advance of 5G networks, and that its costs outweighed any benefits. *See Order* ¶¶ 36-45. The *Order* also altered Tribal involvement in those Section 106 reviews that are still conducted on wireless facilities that were not encompassed in

the small cell exemption. *See id.* ¶¶ 96-130. Two of the five Commissioners dissented. *See Order*, Dissenting Statement of Comm’r Mignon L. Clyburn; Dissenting Statement of Comm’r Jessica Rosenworcel.

We consolidated five timely petitions for review of the *Order* into this action. They challenge the Commission’s exclusion of small cell construction from NHPA and NEPA review, its changes to Tribal involvement in Section 106 review, and its promulgation of the *Order* itself. Three groups of petitioners and intervenors, each designated here by the name of its lead petitioner, challenge the *Order*. United Keetoowah Band of Cherokee Indians (Keetoowah) represents a group of Tribes and historic preservation organizations. Blackfeet Tribe (Blackfeet) represents another group of Tribes and the Native American Rights Fund. The Natural Resources Defense Council (NRDC) represents itself and Maryland citizen Edward B. Myers. Two wireless industry groups (jointly, CTIA) intervened to defend the order alongside the FCC.

## ANALYSIS

We set aside an agency order only if it is “arbitrary, capricious, an abuse of discretion, or otherwise not in accordance with law.” 5 U.S.C. § 706(2)(A). Agencies’ obligation to engage in “reasoned decisionmaking” means that “[n]ot only must an agency’s decreed result be within the scope of its lawful authority, but the process by which it reaches that result must be logical and rational.” *Michigan v. EPA*, 135 S. Ct. 2699, 2706 (2015) (quoting *Allentown Mack Sales & Serv., Inc. v. NLRB*, 522 U.S. 359, 374 (1998)). Although “a court is not to substitute its judgment for that of the agency,” the arbitrary and capricious standard demands that the agency “examine the relevant data and articulate a satisfactory

explanation for its action including a rational connection between the facts found and the choice made.” *Motor Vehicle Mfrs. Ass’n of U.S., Inc. v. State Farm Mut. Auto. Ins. Co.*, 463 U.S. 29, 43 (1983) (internal quotation marks omitted). An agency action is arbitrary and capricious where the agency has “entirely failed to consider an important aspect of the problem” or “offered an explanation for its decision that runs counter to the evidence before the agency, or is so implausible that it could not be ascribed to a difference in view or the product of agency expertise.” *Id.*

The FCC is entitled to deference to its reasonable interpretations of ambiguous provisions of the Communications Act. *See Chevron, USA, Inc. v. Nat. Res. Def. Council, Inc.*, 467 U.S. 837, 844-45 (1984). We owe no deference to the FCC’s interpretations of the NHPA or NEPA, which are primarily administered by the Advisory Council, *see McMillan Park Comm. v. Nat’l Capital Planning Comm’n*, 968 F.2d 1283, 1287-88 (D.C. Cir. 1992), and the Council on Environmental Quality, *see Grand Canyon Tr. v. FAA*, 290 F.3d 339, 341 (D.C. Cir. 2002) (as amended Aug. 27, 2002), respectively.

#### **I. Eliminating NHPA and NEPA Review on Small Cells**

The *Order* did not follow the processes for a programmatic agreement under the NHPA, a categorical exclusion from NEPA, or any other wholesale or aggregated form of review, but simply eliminated NHPA and NEPA review on most small cells by removing them from the FCC’s limited approval authority. Small cells had not previously been defined or regulated separately from macrocell towers. The Commission defines the small cells that its *Order* deregulates as wireless facilities that are not on Tribal lands, do not require antenna structure registration because they could not constitute a

menace to air navigation, do not result in human exposure to radiofrequency radiation in excess of applicable safety standards, and that are “small” per the following conditions:

(i) The facilities are mounted on structures 50 feet or less in height including their antennas . . . or the facilities are mounted on structures no more than 10 percent taller than other adjacent structures, or the facilities do not extend existing structures on which they are located to a height of more than 50 feet or by more than 10 percent, whichever is greater;

(ii) Each antenna associated with the deployment, excluding the associated equipment . . . is no more than three cubic feet in volume;

(iii) All other wireless equipment associated with the structure, including the wireless equipment associated with the antenna and any pre-existing associated equipment on the structure, is no more than 28 cubic feet in volume.

47 C.F.R. § 1.1312(e)(2). Small cells that meet those requirements are now outside the purview of the Commission’s limited approval authority, the mechanism by which it has required NHPA and NEPA review since 1990.

The Commission deregulated small cells as part of a broader effort to reduce regulations that the FCC says “are unnecessarily impeding deployment of wireless broadband networks” on which 5G service depends. *Order* ¶ 3. “Within the next few years,” the Commission explained, “5G networks . . . will make possible once-unimaginable advances, such as

self-driving cars and growth of the Internet of Things,” *i.e.* physical objects controllable over the internet. *Id.* ¶ 1. 5G networks “will increasingly need to rely on network densification,” which entails “the deployment of far more numerous, smaller, lower-powered base stations or nodes that are much more densely spaced.” *Id.* According to the Commission, rapid proliferation of hundreds of thousands of small cells would be hindered by the significant time and cost of NHPA and NEPA reviews, even as the benefits of such review—which it characterized as already minimal—would be negligible because small cells are “inherently unlikely to trigger environmental and historic preservation concerns.” *Id.* ¶ 92; *see also id.* ¶¶ 9, 11-16. It noted that the FCC’s baseline approach to environmental and historic-preservation review, which requires facility-specific review unless a programmatic agreement or categorical exclusion applies, “was developed when all or nearly all deployments involved large macrocell facilities and accordingly failed to consider both the relatively diminutive size of small wireless facilities and the proliferation of these facilities necessary for deployment of advanced wireless technologies.” *Id.* ¶ 9.

In the *Order*, the Commission asserts that federal law does not independently require such review. The only basis for treating small cell construction as either a federal undertaking triggering NHPA review or a major federal action triggering NEPA review was, the Commission says, the limited approval authority the Commission exercised over that construction—which the *Order* eliminated. *See Order* ¶¶ 58-59. The Commission reasons that removing small cell construction from its limited approval authority removes the “sufficient degree of federal involvement” necessary to render an undertaking or action “federal.” *Id.* ¶ 58. It now says its power to exercise limited approval authority over construction derives exclusively from its “public interest authority” under the

Communications Act, *see Order* ¶¶ 39, 53, 61, rather than from “its obligations under Federal environmental laws,” *1990 Order* at 2943 ¶ 9. In this context, the “public interest authority” refers to the FCC’s power to require pre-construction permits for wireless facilities if it “determines that the public interest, convenience, and necessity would be served by requiring such permits.” 47 U.S.C. § 319(d). While the Commission has never made such a determination for the category of facilities at issue here, it has previously interpreted the public interest authority “as allowing the Commission to require covered entities [not requiring preconstruction permits] to nonetheless comply with environmental and historic preservation processing requirements.” *Order* ¶ 53. In the *Order*, the Commission made a new determination that it was not in the public interest to require NHPA and NEPA review on small cells, so simply removed them from its limited approval authority.

Petitioners all argue that the FCC unlawfully excluded small cells from NHPA and NEPA review. They contend first that removing small cells from the FCC’s limited approval authority was arbitrary and capricious. *See* 5 U.S.C. § 706(2)(A). Keetoowah and the NRDC argue that the Commission failed to adequately consider the harms of massive deployment and to justify its decision to completely exempt small cells from review. Additionally, all petitioners argue that the NHPA and NEPA mandate review of small cell construction. They assert that the geographic licenses the Commission grants, which allow wireless companies to operate on spectrum, constitute sufficient federal control over wireless facility construction to make the construction a federal undertaking and a major federal action triggering review under those statutes. Keetoowah also contends that the exclusion violates the Administrative Procedure Act on various other grounds, including that it is an unjustified policy reversal. If

petitioners prevail on any one or more of those grounds, we must vacate the *Order*'s deregulation of small cells and remand to the FCC.

The Commission failed to justify its determination that it is not in the public interest to require review of small cell deployments. We therefore grant the petitions in part because the *Order*'s deregulation of small cells is arbitrary and capricious. The Commission did not adequately address the harms of deregulation or justify its portrayal of those harms as negligible. In light of its mischaracterization of small cells' footprint, the scale of the deployment it anticipates, the many expedients already in place for low-impact wireless construction, and the Commission's decades-long history of carefully tailored review, the FCC's characterization of the *Order* as consistent with its longstanding policy was not "logical and rational." *Michigan v. EPA*, 135 S. Ct. at 2706. Finally, the Commission did not satisfactorily consider the benefits of review.

*First*, the Commission inadequately justified its portrayal of deregulation's harms as negligible. The FCC partly based its public-interest conclusion on a picture of small cells that the record does not support. It described small cells as "materially different from the deployment of macrocells in terms of . . . the lower likelihood of impact on surrounding areas." *Order* ¶ 41. In its brief, the Commission sums up its explanation of the difference: "small cells are primarily pizza-box sized, lower-powered antennas that can be placed on existing structures." Resp't Br. 3; *see also Order* ¶¶ 66, 92. It likened small cells to small household items that operate on radiofrequency such as "consumer signal boosters [and] Wi-Fi routers," which do not undergo review. *Order* ¶ 66. Small cells are, to be sure, quite different from macrocells in many ways, but the Commission fails to address that small cells are typically *mounted* on much

bigger structures, and the *Order* is not limited to deployments on structures that already exist or are independently subject to review. Small cells deregulated under the *Order* can be “mounted on structures 50 feet or less in height including their antennas” or “mounted on structures no more than 10 percent taller than other adjacent structures.” 47 C.F.R. § 1.1312(e)(i). That makes them crucially different from the consumer signal boosters and Wi-Fi routers to which the FCC compares them.

The scale of the deployment the FCC seeks to facilitate, particularly given its exemption of small cells that require new construction, makes it impossible on this record to credit the claim that small cell deregulation will “leave little to no environmental footprint.” *Order* ¶ 41. The Commission anticipates that the needed “densification of small deployments over large geographic areas,” *id.*, could require 800,000 deployments by 2026, FCC, *Declaratory Ruling & Third Report & Order*, FCC 18-133 ¶ 126 (Sept. 26, 2018). Even if only twenty percent of small cells required new construction—as one wireless company estimates and the FCC highlights in its brief, *see* Resp’t Br. 54—that could entail as many as 160,000 densely spaced 50-foot towers (or 198-foot towers, as long as they are located near 180-foot adjacent structures). The Commission does not grapple with that possibility. Instead, it highlights the small cells that can be collocated without addressing the many thousands that cannot be.

As Keetoowah points out, the FCC “offers no analysis of the footprint of” the new towers on which small cells can be mounted, “what equipment will be used, what ongoing maintenance or security will be provided and how often towers will be updated or rebuilt.” Keetoowah Br. 15-16. Deployment of new small cells requires not only new construction but also wired infrastructure, such as electricity hookups, communications cables, and wired “backhaul,”

which connects the new antenna to the core network. *See, e.g., Comment of Sprint*, Joint Appendix (J.A.) 380 (describing process of deploying small cells); *Comment of the Cities of Bos., Mass., et al.*, J.A. 705-06 (describing the equipment associated with small cells), NRDC Br. Ex. A, Decl. of Warren Betts ¶¶ 11-12 (describing concerns about disruption “by the laying of cables and wires, by the maintenance they require, [and] by the sound of the maintenance vehicles” in otherwise tranquil areas, and concerns “that trees may be cut down or damaged by the construction of small cells”). Construction, connection, and maintenance may entail excavation and clearing of land. The Tribal Historic Preservation Officer for the Seminole Tribe of Florida expressed concern about effects of anticipated “additional related infrastructure, such as fencing, security, and access for periodic maintenance and troubleshooting.” Keetoowah Br. Add. 114, Decl. of Paul Backhouse, ¶ 28. While the Commission asserted that “deployment of small wireless facilities commonly (although not always) involves previously disturbed ground,” it eliminated review of small cells that will involve new ground disturbance without responding to concerns about such disturbance. *Order* ¶ 92; *see also, e.g., Comment of the Nat’l Cong. of Am. Indians, et al.* (NCAI), J.A. 430-31 (expressing concern about small cells that require ground disturbance); *Comment of the Cities of Bos., Mass., et al.*, J.A. 707 (“No explanation is offered by the Commission for its exclusion of any ground disturbance related conditions” in the draft *Order*).

The Commission also failed to assess the harms that can attend deployments that do not require new construction, particularly the cumulative harms from densification. While “Tribal Nations are most concerned with federal undertakings that disturb the ground and turn up dirt,” even “[c]ollocations can affect cultural and historical properties th[rough] disturbing view sheds” because “[t]he cultural and spiritual

traditions of Tribal Nations across the United States frequently involve the uninterrupted view of a particular landscape, mountain range, or other view shed.” *Comment of NCAI*, J.A. 50. The FCC did not respond to historic-preservation commenters warning “that permanent, direct adverse effects will be more likely with small wireless facilities as in many cases they are proposed for installation on or in historic buildings,” and “these multi-site deployments have a greater potential to cause cumulative effects to historic properties, cluttering historic districts with multiple towers, antennae, and utility enclosures.” *Comment of Tex. Historical Comm’n*, J.A. 794; *see also, e.g., Ex Parte Comm’n of Thlopthlocco Tribal Town Tribal Historic Pres. Officer*, J.A. 690 (noting that the Commission did not discuss “the issue of multiple collocations on the same pole which cumulatively would exceed the volume restriction and would create an adverse impact”); *Comment of Ark. State Historic Pres. Officer*, J.A. 751 (“[A]lthough individual small cells are unlikely to adversely impact individual historic properties or districts, the FCC doesn’t address how the large scale, nationwide deployment of 5G and small cells facilities will cumulatively impact cultural and natural resources.”). The Commission noted that all facilities remain subject to its limits on radiofrequency exposure, *Order* ¶ 45, but failed to address concerns that it was speeding densification “without completing its investigation of . . . health effects of low-intensity radiofrequency radiation,” which it is currently reassessing. *Comment of BioInitiative Working Grp.*, J.A. 235.

The FCC does not reconcile its assertion that planned small cell densification does not warrant review because it will “leave little to no environmental footprint” with the *Order*’s principal deregulatory effect of eliminating review of precisely the new construction and other deployments that the Commission previously considered likely to pose cultural and

environmental risks. The Commission already had in place NEPA categorical exclusions and NHPA programmatic agreements covering most collocations—as well as other kinds of deployments unlikely to have cultural and environmental impacts. What the new *Order* accomplishes, then, is to sweep away the review the Commission had concluded should not be relinquished.

Since the 1970s, the Commission has explained that most collocations on existing towers or buildings are not “major” federal actions and therefore are not subject to NEPA review. *Implementation of NEPA*, 49 F.C.C.2d at 1319-20; 47 C.F.R. §§ 1.1301-1.1319. The FCC’s NEPA regulations limit environmental review to a small subset of actions likely to have significant environmental effects, *see* 47 C.F.R. § 1.1307, as well as those actions found through Section 106 review to have adverse effects on historic properties, *see id.* § 1.1307(a)(4). Before it promulgated the challenged rule, the Commission had further shrunk the category of actions that receive individualized NHPA or NEPA review by adopting programmatic agreements and categorical exclusions. In chronological order, it excluded most collocations from individualized review, *see Collocation Agreement*, 47 C.F.R. Pt.1, App. B; adopted “categories of undertakings that are excluded from the Section 106 process because they are unlikely by their nature to have an impact upon historic properties,” *Section 106 Agreement*, 20 FCC Rcd. at 1075 ¶ 2; excluded from individualized review new categories of wireless construction and modification unlikely to have historic preservation effects, *see Nationwide Programmatic Agreement for Review Under the National Historic Preservation Act*, 70 Fed. Reg. at 558; and, most recently, expanded NHPA and NEPA exclusions for collocations, *see Improving Wireless Facilities Siting Policies*, 29 FCC Rcd. at 12870 ¶ 11. In sum, the FCC had already streamlined and

minimized review of vast numbers of minor actions, focusing attention only on subcategories of deployments likely to have cultural or environmental effects.

*Second*, in sweeping away wholesale the review it had preserved for the small cell deployments most likely to be disruptive, the *Order* is not, as the FCC asserts, “consistent with the Commission’s treatment of small wireless facility deployments in other contexts,” but directly contrary to it. *Order* ¶ 42. We observe by way of example the Commission’s assertion that “under the Collocation [Agreement], the Commission already excludes” from NHPA review “many facilities that meet size limits similar to those” of small cells. *Id.* As the Commission sees it, the *Order* thus “builds upon the insight underlying these existing rules that small wireless facilities pose little or no risk of adverse environmental or historic preservation effects.” *Id.* But the *Collocation Agreement* exclusion was defined not just by size, but by other characteristics that minimized the likelihood of cultural harm. The section of the *Collocation Agreement* the FCC cites in fact only excludes from individualized NHPA review “small wireless antennas and associated equipment on building and non-tower structures that are outside of historic districts and are not historic properties,” which include property of religious and cultural importance to Tribes. *Collocation Agreement*, 47 C.F.R. Pt.1, App. B § VI (formatting altered); *see also* 54 U.S.C. §§ 300308, 302706. A different section of the *Collocation Agreement*, which did exempt certain collocations of small antennas in historic districts or on historic properties, likewise included numerous conditions to minimize effects on historic properties. An antenna could only be collocated on a historic property if, for example, “a member of the public, an Indian Tribe, a [State Historic Preservation Office] or the [Advisory] Council” had not complained “that the collocation ha[d] an adverse effect on one or more historic properties,”

*Collocation Agreement*, 47 C.F.R. Pt.1, App. B § VII(A)(6), and if the antenna was installed “using stealth techniques that match or complement the structure on which or within which it is deployed,” *id.* § VII(A)(2)(c), and “in a way that does not damage historic materials and permits removal of such facilities without damaging historic materials,” *id.* § VII(A)(4), among other conditions. After the *Order*, none of those limiting conditions applies. The insight of the *Collocation Agreement* was not that small cells by their nature “pose little or no risk of adverse environmental or historic preservation effects,” *Order* ¶ 42, but that small cells under certain carefully defined conditions pose little such risk.

Similarly, the FCC explains its “conclusion that, as a class, the nature of small wireless facility deployments appears to render them inherently unlikely to trigger environmental and historic preservation concerns” by reference to limiting criteria that it chose *not* to place on its small cell exemption. *Id.* ¶ 92. It notes, for example, that “deployment of small wireless facilities commonly (although not always) involves previously disturbed ground, where fewer concerns generally arise than on undisturbed ground,” and reiterates that “use of existing structures, where feasible, can both promote efficiency and avoid adverse impacts on the human environment.” *Id.* But the Commission decided not to limit the *Order*’s exemption only to facilities sited on previously disturbed ground, or those that are collocated on existing structures. It therefore fails to justify its conclusion that small cells “as a class” and by their “nature” are “inherently unlikely” to trigger concerns.

By ignoring the extent to which it had already streamlined review, the Commission also overstated the burdens of review. It said it could not “simply turn a blind eye to the reality that the mechanical application of [limited approval authority] requirements to each of [the] small deployments” necessary for

5G “would increase the burden of review both to regulated entities and the Commission by multiples of tens or hundreds.” *Id.* ¶ 65. As the preceding discussion of the *Collocation Agreement* illustrates, however, the FCC was not indiscriminately or “mechanic[ally]” requiring full NHPA and NEPA review for each individual small cell. The Commission fails to explain why the categorical exclusions and programmatic agreements in place did not already minimize unnecessary costs while preserving review for deployments with greater potential cultural and environmental impacts.

*Third*, given that only the most vulnerable cases were still subject to individualized NHPA or NEPA review, the Commission did not adequately address either the possible benefits of retaining review, or the potential for further streamlining review without eliminating it altogether. It dismissed the benefits of historic-preservation and environmental review in a two-sentence paragraph, describing most of the comments that highlight those benefits as “generalized” and the comments that point to specific benefits as “few.” *Id.* ¶ 78. Characterizing a concern as “generalized” without addressing that concern does not meet the standard of “reasoned decisionmaking.” *Michigan v. EPA*, 135 S. Ct. at 2706.

The Commission found that adverse effects are rare, but it considered neither the importance of the sites review does save, nor how that rarity depends on the very review it eliminates, which forestalled adverse effects that otherwise would have occurred. The FCC cited comments suggesting that only 0.3 or 0.4% of requests for Tribal review result in findings of adverse effects or possible adverse effects. *Order* ¶ 79. Based on the estimate of 800,000 small cell deployments, that could mean 3,200 adverse effects. The *Order* displayed no consideration of the importance of the 3,200 Tribal sites that might be saved

through review except to describe that benefit as “*de minimis* both individually and in the aggregate.” *Id.* As counsel for petitioner Blackfeet Tribe said at oral argument: “They may think that’s infinitesimal. To us, it means the world.” Oral Argument at 1:16:16-20. The Commission also did not address comments that “no adverse effects in 99% of tower deployments shows that the current system is working” because “[o]ften, after an applicant enters a location into” the Tower Construction Notification System, a Tribal representative “will notify the applicant of an issue and the applicant will choose a new location or resolve that effect,” which “gets counted as having no adverse effect.” *Comment of Nat’l Ass’n of Tribal Historic Pres. Officers*, J.A. 661. Other commenters agreed that “[t]he lack of significant impact should be a testament to the value of the review process in these instances, not negate its necessity.” *Comment of Tex. Historical Comm’n*, J.A. 794 (“In our experience, the vast majority of adverse effects for cell projects are resolved through sensitive design modifications, including stealth measures, modifying how equipment is attached if directly mounted to a historic building or structure, or relocation to an alternate site further removed from historic properties.”).

Similarly, the Commission dismissed the point that its own oversight deters adverse effects by describing comments to that effect as “generalized, and undercut by our conclusion that, as a class, the nature of small wireless facility deployments appears to render them inherently unlikely to trigger environmental and historic preservation concerns.” *Order* ¶ 92. For the reasons already explained, the FCC’s conclusion that small cells are inherently unlikely to trigger concerns is arbitrary and capricious, and describing comments as “generalized” does not excuse the agency of its obligation to consider those comments as part of reasoned decisionmaking.

We hold that the *Order's* deregulation of small cells is arbitrary and capricious because its public-interest analysis did not meet the standard of reasoned decisionmaking. We therefore decide neither the alternative grounds for holding that the *Order* is arbitrary and capricious or otherwise violated the Administrative Procedure Act, nor the claim that small cell construction is a federal undertaking and a major federal action requiring NHPA and NEPA review.

## II. Tribal Involvement in Section 106 Review

The *Order* also made three changes to Tribal involvement in the Section 106 review not eliminated by the *Order*, such as review of macrocells and small wireless facilities on Tribal land. The first two changes relate to two types of Tribal involvement that the Commission and the Advisory Council distinguish from one another: (a) government-to-government consultation between the agency and the Tribes, in which Tribes function in their governmental capacity, and (b) the “identification and evaluation phase of the Section 106 process when the agency or applicant is carrying out its duty to identify historic properties that may be significant to an Indian tribe.” Advisory Council, *Consultation with Indian Tribes in the Section 106 Review Process: A Handbook (Section 106 Handbook)*, J.A. 1015; see also FCC, *Voluntary Best Practices for Expediting the Process of Communications Tower and Antenna Siting Review Pursuant to Section 106 of the NHPA*, J.A. 933; *Order* ¶¶ 118-19.

Section 106 review comprises “four steps”: “initiation, identification, assessment [or evaluation], and resolution.” *Section 106 Handbook*, J.A. 1018. Government-to-government consultation is a background requirement of Section 106 review at every stage. See *id.* at J.A. 1014, 1018; Advisory Council, *Fees in the Section 106 Review Process*,

J.A. 913; 36 C.F.R. § 800.2(c)(2)(ii)(A) (consultation requires giving the interested Tribe “a reasonable opportunity to identify its concerns about historic properties, advise on the identification and evaluation of historic properties, . . . articulate its views on the undertaking’s effects on such properties, and participate in the resolution of adverse effects”). In the identification and evaluation period, however, applicants have often paid for expertise and assistance from Tribes acting “in a role similar to that of a consultant or contractor” such as by providing “specific information and documentation regarding the location, nature, and condition of individual sites” or even conducting surveys. *Section 106 Handbook*, J.A. 1015. The *Order* explains that identification and evaluation involves “activities undertaken after the initial determination that historic properties are likely to be located in the site vicinity,” and that it includes “monitoring and other activities directed toward completing the identification of historic properties as well as assessing and mitigating the project’s impacts on those properties.” *Order* ¶ 124.

The “initial determination” falls into the government-to-government consultation category. *See Section 106 Handbook*, J.A. 1021 (explaining that initiating contact with Tribes is part of the Commission’s “responsibilities to conduct government-to-government Consultation”). In practice, however, Tribes have been allowing applicants to contact them directly, in lieu of government-to-government consultation, to help make the initial determination. *See Section 106 Agreement*, 20 FCC Rcd. at 1108 ¶¶ 95-96; Keetoowah Br. 37. The *Section 106 Agreement* “expresses the ambition that this initial contact will lead to voluntary direct discussions through which applicants and tribes . . . will resolve questions involving the presence of relevant historic properties and effects on such properties to the tribe[’s] . . . satisfaction without Commission involvement.” 20 FCC Rcd. at 1108 ¶ 97. But “if an applicant and an Indian

tribe . . . disagree regarding whether an undertaking will have an adverse effect on a historic property of religious and cultural significance, or if the tribe . . . does not respond to the applicant's inquiries," the Commission steps in to consult and ultimately "make a decision regarding the proposed undertaking." *Id.*

The Advisory Council explains that "[t]hese two tribal roles"—government-to-government consultation, and assistance with identification and evaluation—"are not treated the same when it comes to compensation, although the line between them may not be sharp." Advisory Council, *Fees in the Section 106 Review Process*, J.A. 913. Advisory Council guidance states that "agencies are strongly encouraged to use available resources to help overcome financial impediments to effective tribal participation in the Section 106 process" and applicants are likewise "encouraged to use available resources to facilitate and support tribal participation." Advisory Council, *Section 106 Handbook*, J.A. 1015. At the same time, it says that agencies and applicants should not expect to pay fees for government-to-government consultation, which "give[s] the Indian tribe an opportunity to get its interests and concerns before the agency," Advisory Council, *Fees in the Section 106 Review Process*, J.A. 913, but "should reasonably expect to pay" fees for the identification and evaluation, which puts Tribes in a "consultant or contractor" role, Advisory Council, *Section 106 Handbook*, J.A. 1015. It notes, however, that "this encouragement is not a legal mandate; nor does any portion of the NHPA or the [Advisory Council's] regulations require an agency or an applicant to pay for any form of tribal involvement." *Id.*

First, apparently because applicants had been consistently paying upfront fees, *see Keetoowah Br. 37*, the *Order* made clear that applicants' payment of upfront fees to Tribes is

voluntary. *See Order* ¶ 116. Upfront fees are payments made to Tribes for the initial determination whether the Tribe actually has religiously or culturally significant properties that might be affected by a proposed construction. *See id.* ¶ 116. Applicants contact Tribes for that initial determination when Tribes have noted that properties in the general area of proposed construction may have religious or cultural significance for them. *Id.* When an applicant follows up “to ascertain whether there are in fact such properties that may be affected,” some Tribes have requested upfront fees before they will respond. *Id.* As the *Order* describes the practice, the upfront fees “do not compensate Tribal Nations for fulfilling specific requests for information and documentation, or for fulfilling specific requests to conduct surveys,” but are “more in the nature of a processing fee” to “obtain a response” to an applicant’s initial Tower Construction Notification contact with a Tribal Nation. *Id.* ¶ 119.

Second, while the *Order* approved of fees for identifying and evaluating properties that may be significant to Tribes, as opposed to upfront fees, *see id.* ¶ 123, it also authorized applicants to consult with non-Tribal parties in the identification and evaluation phase, *see id.* ¶¶ 124-45. The Commission found that, if an applicant asks a Tribe to perform work to aid it in documenting, surveying, or analyzing potentially historic properties, “the applicant should expect to negotiate a fee for that work” and, if the parties are “unable to agree on a fee, the applicant may seek other means to fulfill its obligations.” *Id.* ¶ 125. “The agency or applicant is free to refuse just as it may refuse to pay for an archeological consultant, but the agency still retains the duties of obtaining the necessary information for the identification [and evaluation] of historic properties . . . through reasonable means.” *Id.* (quoting Advisory Council, *Section 106 Handbook*, J.A. 1015).

Third, the *Order* shortened from 60 to 45 days the timeline for Tribes to respond to notifications on the Tower Construction Notification System, eliminated the requirement that applicants make a second attempt to contact Tribes, and shortened from 20 to 15 days the timeline for Tribal response to Commission contact. *Id.* ¶¶ 110-11.

Keetoowah and Blackfeet challenge those three changes as arbitrary and capricious and inconsistent with the NHPA. Keetoowah complains that the *Order* “encourages applicants, which have until this point voluntarily paid fees, to refuse paying Tribes” upfront fees, Keetoowah Br. 37; that “FCC implementation goes far beyond the terms of the Order by refusing to even allow Tribes to request voluntary fees through” the Tower Construction Notification System, *id.* at 37-38; that letting applications proceed where Tribes refuse to participate without compensation or are not hired as consultants violates the Commission’s legal obligation to consult with Tribes, *id.* at 38; and that the shortened timelines are unreasonable, *id.* at 40. Blackfeet asserts that the Commission lacks “the authority to prohibit tribes from collecting fees” because only the Advisory Council may promulgate regulations implementing Section 106. Blackfeet Br. 16.

None of those challenges is availing. The clarification that applicants are not required to pay upfront fees is consistent with the Advisory Council’s preexisting guidance and does not violate the Commission’s duty to consult with Tribes. The *Order* permissibly authorizes applicants to contract with non-Tribal parties in the identification-and-evaluation phase because it stipulates that contractors must be “properly qualified,” which we understand does not authorize hiring other contractors in any circumstance in which only Tribes are

qualified. *Order* ¶ 128. The shortened timeline for Tribal response is reasonable and sufficiently explained.

#### A. Upfront Fees

The *Order* permissibly confirms that upfront fees for Tribes to comment on proposed deployments are voluntary. Unchallenged Advisory Council regulations already make clear that fees are voluntary, so the *Order*'s reiteration of the same point is not arbitrary and capricious. While applicants have apparently been uniformly paying upfront fees for Section 106 review, no party asserts that they have been required to do so. *See* Keetoowah Reply Br. 20. The Advisory Council has been explicit that no "portion of the NHPA or the [Advisory Council's] regulations require an agency or an applicant to pay for any form of tribal involvement." Advisory Council, *Section 106 Handbook*, J.A. 1015; *see also* Advisory Council, *Fees in the Section 106 Review Process*, J.A. 913 (neither the NHPA nor Advisory Council regulations "requires Federal agencies to pay for any aspect of tribal [or] other consulting party participation in the Section 106 process"). Blackfeet's complaint that "[t]he FCC does not have the authority to prohibit tribes from collecting fees" and that the *Order* is impermissibly "implementing and administering Section 106 through regulation" is misplaced. The challenged *Order* contains no such prohibition, but does no more than recognize and reiterate the Advisory Council's existing rule.

The Commission has a non-delegable duty to consult with Tribes about the effect of federal undertakings on property significant to the Tribes, which Tribes can invoke or waive as they choose. The NHPA mandates that, "[i]n carrying out its responsibilities under [Section 106], a Federal agency shall consult with any Indian tribe . . . that attaches religious and cultural significance to property." 54 U.S.C. § 302706(b). The

Advisory Council has explained that “federal agencies cannot unilaterally delegate their tribal consultation responsibilities to an applicant,” but can only delegate if “expressly authorized by the Indian tribe to do so.” Advisory Council, *Limitations on the Delegation of Authority by Federal Agencies to Initiate Tribal Consultation under Section 106 of the National Historic Preservation Act (Limitations on Section 106 Delegation)* 1 (2011), <https://go.usa.gov/xyWGq>. The Commission has also recognized that its “fiduciary responsibility and duty of consultation [to Tribes] rest with the Commission as an agency of the federal government, not with licensees, applicants, or other third parties.” *Section 106 Agreement*, 20 FCC Rcd. at 1106 ¶ 91.

Keetoowah says its challenge is not to the “FCC’s clarification that fees are voluntary,” but to “the Order’s determination that FCC will process applications without tribal input if tribes insist on charging applicants for their reviews.” Keetoowah Reply Br. 19-20. That determination, Keetoowah asserts, violates the Commission’s “statutory obligation to consult with tribes.” *Id.* at 19. Under the *Section 106 Agreement*, Tribes can and do permit applicants to contact them to request review of proposed construction—essentially agreeing to accept that contact in satisfaction of the Commission’s responsibility to consult with Tribes directly. 20 FCC Rcd. at 1108 ¶ 96; *see also* Keetoowah Br. 37; *Comment of the Seminole Tribe of Florida*, J.A. 743 (“[T]ribes participate in review . . . on a voluntary basis” as a substitute for “direct Section 106 consultation with the FCC.”) But Tribes can request “the federal agency to reenter the consultation process at any time . . . since the federal agency remains responsible for government-to-government consultation.” *Limitations on Section 106 Delegation* 2. Keetoowah implies that Tribes have only agreed to accept direct contact from applicants under the condition that

applicants pay for Tribes' responses—meaning that if Tribes refuse to respond without being paid upfront fees, they will not have waived the Commission's responsibility to consult with them directly. Without having fulfilled its legal obligation to consult, Keetoowah contends, the Commission cannot permit applicants to go ahead with construction.

Keetoowah overlooks the fact that when a Tribe refuses to review an application without being paid, the *Order* requires the Commission to step in to ask the Tribe for a response before allowing applicants to construct. Tribes' refusal to respond triggers a process in which applicants can refer the matter to the Commission, the Commission must contact Tribes directly, and Tribes have 15 days from Commission contact to respond. *See Order* ¶ 111. Only if the Tribe does not timely respond to the Commission are "the applicant's pre-construction obligations . . . discharged with respect to that Tribal Nation." *Id.* The Tribe is guaranteed the opportunity to consult as a sovereign—a capacity in which it need not be paid—and the Commission cannot force an unwilling Tribe to respond. Therefore, if a Tribe refuses to respond when the Commission requests its views on an application, the Commission has discharged its obligation of direct Commission-to-Tribe consultation. *See id.* ¶ 111. Apart from the shortened timeframe, discussed below, Keetoowah has not offered any reason the Commission's contacting Tribes directly with a request to consult that the Tribe rejects does not satisfy the Commission's consultation obligation.

Finally, the objection that the Commission is prohibiting Tribes from requesting voluntary fees on the Tower Construction Notification System, Keetoowah Br. 38-40, is not properly before us. That prohibition does not appear in the *Order* itself but seems to originate with a later decision of Commission staff. *See Resp't Br.* 64 n.19.

## B. Non-Tribal Consultation

The *Order* states that applicants need not contract with Tribes to identify which properties have historic or cultural significance to Tribes and determine how to assess or mitigate adverse effects of construction. *Order* ¶¶ 124-25, 128-29. Keetoowah argues that allowing applicants to contract with non-Tribal parties is arbitrary and capricious because “only Tribes are qualified to perform” such services “based on their unique, often sacred, knowledge.” Keetoowah Br. 23. Because the *Order* stipulates that contractors must be “properly qualified,” we reject the arbitrary-and-capricious claim. *Order* ¶ 128.

Advisory Council regulations require the agency to “make a reasonable and good faith effort to carry out appropriate identification efforts” under Section 106. 36 C.F.R. § 800.4(b)(1). The *Order* explains that “the applicant is not bound to any particular method of gathering information,” *Order* ¶ 125, but it stipulates that contractors must be “properly qualified,” *id.* ¶ 128. The “reasonable and good faith efforts” standard together with the *Order*’s mandate that parties be “properly qualified” may sometimes require applicants to hire Tribes—for instance, where Tribes have “unique” and “sacred” knowledge of historic properties. Advisory Council guidance supports that notion, explaining that “unless an archeologist has been specifically authorized by a tribe to speak on its behalf on the subject, it should not be assumed that the archaeologist possesses the appropriate expertise to determine what properties are or are not of significance to an Indian tribe.” *Section 106 Handbook*, J.A. 1022. The *Order* itself suggests that applicants should try to hire Tribes first: “[I]f an applicant asks a Tribal Nation” to perform identification and evaluation of historic properties, “the applicant should expect to negotiate a fee for that work,” but if the Tribe and applicant “are unable

to agree on a fee, the applicant may seek other means to fulfill its obligations.” *Order* ¶ 125. We cannot say, *ex ante*, how often as a practical matter applicants might find qualified non-Tribal contractors or whether, as applied, the law will ordinarily require hiring Tribes. If a Tribe believes an applicant has hired an unqualified contractor, that issue can be litigated when it arises.

### C. Timeline Changes

Keetoowah’s one-paragraph challenge to the *Order*’s shortening the timeline for Tribal response to Tower Construction Notification System notifications provides no basis on which to hold the shortened timeline arbitrary and capricious. Keetoowah Br. 40. Its sole objection is that Tribes “operate with limited staff and budget, making the shortening of Tribal review time unreasonable.” *Id.* The Commission acted within its discretion and “considered the relevant factors and articulate[d] a rational connection between the facts found and the choice made.” *Vonage Holdings Corp. v. FCC*, 489 F.3d 1232, 1241 (D.C. Cir. 2007) (quoting *BellSouth Telecomms., Inc. v. FCC*, 469 F.3d 1052, 1056 (D.C. Cir. 2006) (alteration in original)). It reasonably justified the decision as a compromise between industry requests for even shorter timelines to address delays, and Tribes’ need for adequate time to review submissions. *See Order* ¶¶ 112 n.262, 113.

### III. Promulgation of the *Order* Itself

All petitioners argue that the promulgation of the *Order* itself violated the law. Keetoowah and Blackfeet argue that the Commission violated its duty to consult with Tribes, as established by the Tribes’ sovereign status and the government-to-government relationship recognized in Article I, Section 8 of the Constitution, the NHPA, and the Commission’s regulations. *See Keetoowah Br. 40-42; Blackfeet Br. 20-21.*

The NRDC argues that the *Order* itself was a major federal action that required NEPA review. *See* NRDC Br. 10-11. Because the *Order* documents extensive consultation with Tribes, we reject the first contention. We lack jurisdiction to consider the second because the NRDC forfeited it by failing to raise it to the Commission.

As for the Tribes' contention that the *Order* is invalid because the Commission did not meet its obligations to consult with Tribes, the Commission responds that it extensively consulted with Tribes, and that in any event its consultation obligation is not judicially enforceable. Resp't Br. 69-74. We conclude that the Commission fulfilled its obligation to consult. The Commission presented abundant evidence that it "consulted" Tribes in the ordinary sense of the word, and the Tribes have offered no other concrete standard by which to judge the Commission's efforts.

On this record, we cannot say that the Commission failed to consult with Tribes in its meetings and other communications, which began in 2016 and continued through early 2018. *See Order* ¶¶ 19, 34. The Commission documented extensive meetings it held with Tribes before it issued the *Order*. *See Order* ¶¶ 19-35. Under Advisory Council regulations, "[c]onsultation means the process of seeking, discussing, and considering the views of other participants, and, where feasible, seeking agreement with them regarding matters arising in the section 106 process." 36 C.F.R. § 800.16(f); *see also* 54 U.S.C. § 302706(b). The dictionary definition of consulting is "seek[ing] advice or information of." *Consult*, *American Heritage Dict.* (5th ed. 2019). Keetoowah complains that the FCC's efforts were "listening sessions, briefings, conference calls, and delivery of remarks by a Commissioner" rather than "consultations," and presents evidence that Tribes did not view these meetings as

consultations. Keetoowah Br. 44. But it offers no standard by which to judge which consultations were “listening sessions” or whether a “listening session” or a conference call qualifies as a consultation. The only case Keetoowah cites interpreting an agency’s failure to consult is inapposite: there, an agency official “acknowledged at trial” that the contested decision “had already been made prior to” the first meeting between Tribal members and agency officials discussing the decision. *Oglala Sioux Tribe of Indians v. Andrus*, 603 F.2d 707, 710 (8th Cir. 1979). No evidence in this record suggests the Commission had already determined the *Order*’s substance before meeting with Tribes—and the series of communications and meeting commenced even before the Commission issued the Notice of Proposed Rulemaking. *See Order* ¶ 19. The Commission appeared to “seek[], discuss[], and consider[] the views of” the Tribes, even if it did not ultimately adopt those views.

The NRDC argues that promulgating the *Order* was itself a major federal action that required NEPA review. *See* NRDC Br. 10-11. But, as intervenor CTIA points out, the NRDC forfeited that argument by failing to make it to the Commission, *see* CTIA Br. 38, and we lack jurisdiction to review a claim that was not raised there. *Free Access & Broad. Telemedia, LLC v. FCC*, 865 F.3d 615, 619 (D.C. Cir. 2017). While the NRDC points to its own and others’ comments “urg[ing] the Commission to conduct a NEPA analysis,” NRDC Reply Br. 3, none of those comments said the Commission was required to perform a NEPA analysis *of the Order*. The NRDC cites its own comment “that if the FCC sought to exclude an entire category of wireless facilities from NEPA, it was required to establish a categorical exclusion.” *Id.* (citing J.A. 787-90). But the NRDC did not there contend, as it now does, that the *Order* is a major federal action. Rather, the NRDC’s argument was that the federal character of the

geographic area license meant that the Commission could not entirely exempt wireless facility construction from NEPA review, J.A. 790—the same statutory argument it made here—and that the proper approach to exempting federal “activities that by their nature do not have significant impacts on the environment is with a categorical exclusion,” J.A. 789. Whether the licenses or construction are federal, the basis of the NRDC’s argument, is irrelevant to the question whether the *Order* overall is a major federal action that requires NEPA review. One of the other two comments it cites asserted that the proposed rule failed to comply with NEPA, but again, not because the *Order* required NEPA analysis—rather because the issuance of licenses constitutes a major federal action. *See Comment of the Nat’l Trust for Historic Pres.*, J.A. 770. The third comment urged the Commission to consider the cumulative effects of radiofrequency exposure, but did not even mention NEPA. *See Comment of BioInitiative Working Grp.*, J.A. 235-38. The argument that the *Order* required independent NEPA review was never fairly before the Commission.

### CONCLUSION

We grant the petitions to vacate the *Order*’s removal of small cells from its limited approval authority and remand to the FCC. We deny the petitions to vacate the *Order*’s changes to Tribal involvement in Section 106 review and to vacate the *Order* in its entirety.

*So ordered.*

**From:** [Board of Supervisors. \(BOS\)](#)  
**To:** [BOS-Supervisors](#)  
**Subject:** FW: Concerning the proposed closure of JJC  
**Date:** Thursday, January 23, 2020 2:44:00 PM

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**From:** Allen Jones <jones-allen@att.net>  
**Sent:** Sunday, January 12, 2020 1:11 PM  
**To:** Board of Supervisors, (BOS) <board.of.supervisors@sfgov.org>; Breed, Mayor London (MYR) <mayorlondonbreed@sfgov.org>  
**Cc:** metro@sfchronicle.com; newstips <newstips@sfexaminer.com>; Joshua S <jsabatini@sfexaminer.com>; Tucker, Jill <jtucker@sfchronicle.com>; Joaquin Palomino <JPalomino@sfchronicle.com>; P Matier <pmatier@sfchronicle.com>; Cowan, Sheryl (JUV) <sheryl.cowan@sfgov.org>; Silva-Re, Pauline (JUV) <pauline.silva-re@sfgov.org>  
**Subject:** Concerning the proposed closure of JJC

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

Attention: All Members of the SF Board of Supervisors, **Mayor London Breed, All Juvenile Probation Commissioners,**

On Friday January 10, 2020, news crews were up at juvenile hall for the beginning of a "high profile" murder trial for a juvenile. Later that evening a 17-year-old was booked into custody on a murder charge. This young man shot his victim in the face and neck.

Why do I bring this to your attention?

The proposed future juvenile community facility proposes a greater opportunity for escape. Detainees held at the hall now, will need to be escorted to the court from a "community" detention facility under your new planned community location.

The possibility of escape is increased greatly by this one oversight. I say this as a witness (in the unit) to the 11 who escaped the old juvenile hall building on August 20, 1993.

"SF City Hall Unwise Plan to toss Unwanted Youth to the NIMBYS" by Allen Jones  
<https://link.medium.com/JHyTLPqn52>

The treatment of this young man Imran Rabbani by a jailer, if you will in the Newark, New Jersey juvenile hall is why I am opposed to closing the SF juvenile hall. I've seen this with my own eyes. More people like Robert Woodson are needed. And I understand juvenile hall is hiring as of today.  
<https://www.jobapscloud.com/SF/sup/bulpreview.asp?R1=TEX&R2=8562&R3=077030>

The link is from the LA Times for 1/12/20:  
"Extremist finds a new path"

[http://enewspaper.latimes.com/infinity/article\\_share.aspx?guid=b0dbb8cd-664c-4de8-bf6f-0b73be51c45b](http://enewspaper.latimes.com/infinity/article_share.aspx?guid=b0dbb8cd-664c-4de8-bf6f-0b73be51c45b)

Allen Jones  
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Californiaclemency.org

*The Only thing I love more than justice is the freedom to fight for it.*  
*--AllenJones--*