



PUBLIC WORKS COMMISSION
CITY AND COUNTY OF SAN FRANCISCO

Daniel Lurie, Mayor

Correspondence Log

December 5, 2025, through January 2, 2026

Date Received	From	Subject
12/17/2025	Shaun Auckland	Follow-Up to Public Works Commission Comment
12/19/2025	Shaun Auckland	Re: Follow-Up to Public Works Commission Comment

From: [Shaun Aukland](#)
To: [DPW-Public Works Commission](#)
Cc: [Short, Carla \(DPW\)](#)
Subject: Follow-Up to Public Works Commission Comment
Date: Wednesday, December 17, 2025 9:16:18 AM
Attachments: [Concrete Over Canopy - How San Francisco Is Failing Its Environmental Justice Communities.pdf](#)
[Coalition Letters.pdf](#)

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

Dear President Post, Chair-Elect Zoghbi, and Commissioners,

Thank you for the opportunity to speak during General Public Comment at your recent meeting.

During my comments, I referenced data regarding the systemic inequity facing SOMA West and other Environmental Justice Communities. To ensure the Commission has the full context for its oversight duties, I am formally submitting the attached documents for the record:

- **"Concrete Over Canopy" Report:** A data-driven analysis detailing how District 6 has been systematically excluded from funding (including the \$12M IRA Grant and Prop L), resulting in the lowest tree canopy in the city (2.7%).
- **Coalition Letters of Support:** Signed by 35+ organizations and 800+ residents, calling for a legislative solution to these disparities. You will see the first one is UC Center for Climate, Health, and Equity.

As stated in my public comment, these documents substantiate the following concerns:

- **Funding Exclusion:** Despite generating 24% of the city's sales tax revenue, District 6 received 0% of the recent Prop L planting allocation, while District 10 received 100%. These funds were publicly announced to be for Districts 5, 6, and 10. This was in addition to the \$12M in Inflation Reduction Act funds that were directed away from SOMA.
- **Neglect:** Public Works documents admit to 500+ empty tree wells in SOMA, yet has no plan to fill them.
- **Accountability:** Director Short admitted that the Department has no Equity Plan, and personally committed to working with us on a Tree Equity Plan during an in-person meeting back in September, but the department has since ceased communication on this promise. Such plans exist in other major cities like Oakland, Sacramento, and Los Angeles.

Finally, I wish to offer a factual correction regarding the discussion during the Director's Report: The SOMA Nursery is Not "Beautification": It was suggested that the Street Tree Nursery in SoMa serves as a beautification project. This is incorrect. It is a locked, chain-linked industrial facility under a freeway. Counting an inventory depot as "neighborhood greening" distorts the reality that our residents live in a concrete heat island.

Lastly, regarding the "inhospitable" narrative -- we are concerned by the Director's characterization of neighborhoods like ours as "inhospitable." This rhetoric mirrors the

department's written policy allowing planting deferrals near homeless shelters. Using social challenges as a justification to withhold environmental investment effectively codifies these neighborhoods as containment zones.

We ask the Commission to review the attached report and exercise its oversight to ensure the department follows the General Plan's equity mandates.

Sincerely,

Shaun Aukland
FairTrees.org

[Attachments: Concrete Over Canopy Report.pdf, Coalition Letters.pdf]

Concrete Over Canopy

How San Francisco is Failing Its Environmental Justice Communities



Prepared by: Shaun Aukland, on behalf of the Save SF's Narrow Street Trees working group

Prepared for: San Francisco City Leaders & Community Partners

Contact: shaun.aukland@gmail.com

August 17, 2025 (v3), Digital version: sftrees.short.gy/equity

Executive Summary

Trees are an essential component of the City's ecosystem and provide enormous environmental and social benefits. However, through a pattern of administrative policy and departmental inaction, the city has ensured its most burdened neighborhoods lose tree canopy over the coming years. This violates its own laws, fails the Environmental Justice Communities, and undermines the legally-binding mandates of its General Plan. This paper presents a data-driven case that this systemic failure, using the acute impacts the SoMa West neighborhood as a case study, is driven by three key factors:

1. A flawed and arbitrary policy, **Public Works Order 187246**, which guarantees the elimination of tree canopy in the city's most vulnerable neighborhoods, filling thousands of former tree wells with concrete.
2. A failure to implement the city's Environmental Justice Framework, demonstrated by a data analysis of DPW's **discretionary tree plantings** since the framework's adoption that reveals a random distribution, ignoring the legal requirement to prioritize and close the canopy gap in EJCs.
3. A misallocation of resources, highlighted by DPW's misdirection of a \$12 million federal grant that diverted funds away from many communities they were intended to serve, primarily in SoMa, the Tenderloin, Bayview, Lower Nob Hill, and the Mission.

This document proves the case for repealing the damaging order, and more importantly, provides a clear path forward. This problem is solvable and worth solving, but it requires a coordinated effort. We lay out a Phased Path to Accountability and Action (Section 4) and request specific actions from the Director of Public Works, the SF Board of Supervisors, the Urban Forestry Council, the Commission on the Environment, the Planning Department, and the Mayor's Office. Implementing this plan will bring the city into legal compliance, finally aligning its actions with its commitments to climate, equity, and a healthy urban forest for all.

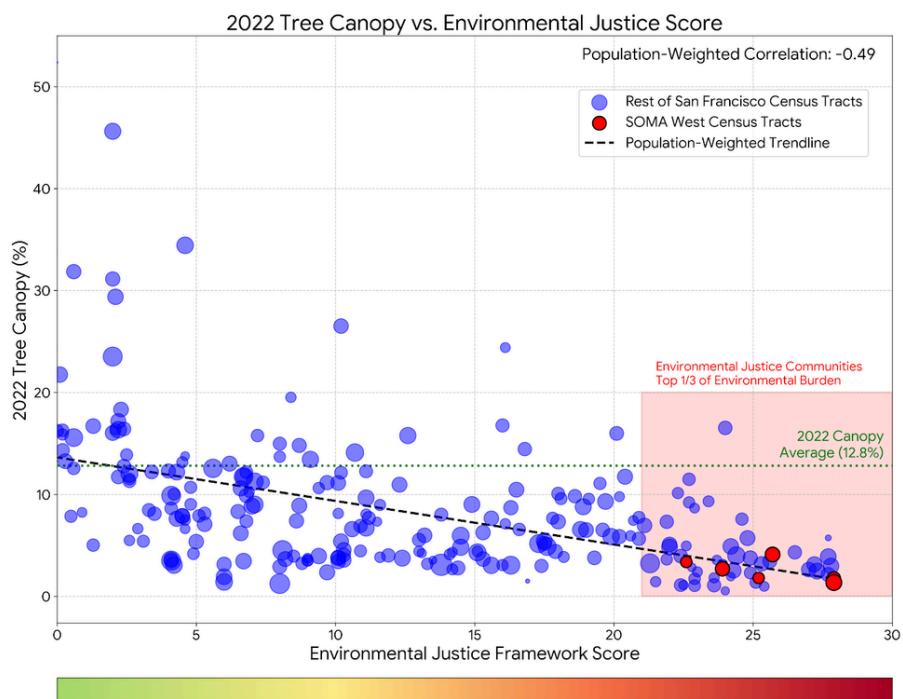
1. The Mandate: San Francisco's Legal Duty to Ensure Environmental Justice

The State of California, through Senate Bill 1000, legally mandated that San Francisco adopt policies to redress environmental injustice and 'reduce health risks' in its most burdened communities.¹ San Francisco's [Environmental Justice Framework](#) (EJF) was created and incorporated into the General Plan to meet this requirement². The framework is grounded in an acknowledgment of "environmental racism,"³ and uses the percentage of persons of color as a key indicator of vulnerability⁴. In its policy recommendation, it specifically instructs the city to "Develop neighborhood specific targets for tree canopy cover and urban forestry."²



The city's officially designated Environmental Justice Communities (red) are concentrated in the eastern half of the city.

Data proves not only that a structural inequity exists, but that the city has failed to take legally mandated action to correct it. The lack of tree canopy is not random; it is structurally linked to environmental burdens, as demonstrated by a strong negative correlation of -0.53 between a census tract's tree canopy and its Environmental Justice Score⁵. This is the visual definition of an inequitable distribution of an environmental benefit, which the city is legally mandated to correct.⁶



Tree canopy is lowest in the communities facing the highest environmental burdens. Each dot represents a census tract, with red dots showing SoMa West. As burdens increase, canopy cover drops steeply—confirming structural inequity.

2. The Violation: Policy and Practice that Deepens Inequity

Rather than closing the canopy gap, the city's actions actively widen it. This is not a single failure, but a pattern of decisions across policy, practice, and funding that perpetuates environmental injustice in communities like SoMa, the Tenderloin, Lower Nob Hill, and Bayview. Here we use SoMa West as a clear case study.

A Flawed Policy that Widens the Gap

“

“When I requested a new tree for an empty well, I was instead ordered to fill it with concrete at my own expense, within 30 days, or face a lien on my property.”

- Shaun Aukland, SoMa Resident

”

[Public Works Order 187246](#) bans tree planting on sidewalks under 7.5 feet⁷, an extreme national outlier based on faulty reasoning. This is unsupported by law or logic. The order claims to support ADA compliance, yet its 7.5-foot requirement far exceeds the clear path mandates in federal, state, and local law, which range from 3 to 4 feet.

Standard/Law	Required Clear Path
Federal ADA Law	36 inches (3 ft)
California State Law	48 inches (4 ft)
SF Public Works Order 187246	48 inches (4 ft)

City	Sidewalk Policy for Trees
San Francisco	Prohibits trees on sidewalks less than 7.5 ft total width
New York, NY	Requires a 4-foot clear path; no width minimum.
Los Angeles, CA	Requires a 4-foot clear path alongside a planting strip.
Portland, OR	Focuses on a 6-foot pedestrian zone, allowing creative solutions.
Boston, MA	Has a goal for 7-foot sidewalks but allows planting if a 3 to 4-foot clear path is maintained.

A Break from 150 Years of City Planning: The 7.5-foot rule is a recent departure from over a century of context-sensitive planning. San Francisco's historic alleys, like those in SoMa laid out in the 1850s, often have sidewalks that are 6-7 feet wide, and were long governed by flexible standards. The current policy misapplies a modern, new-construction standard retroactively, effectively penalizing historic neighborhoods for their age despite having sufficient ADA passage.

A Direct Conflict with Local Zoning: The policy contradicts the specific zoning laws created to protect the community. A significant portion of the impacted area falls within the SoMa Youth and Family Special Use District (SUD), established by Planning Code Section 249.40A. The SUD's legally codified purpose is to "protect and enhance the health and environment of youth and families." This policy is especially harmful given that SoMa is one of the most park-poor neighborhoods in San Francisco, with residents reporting a significant lack of green space.²¹

By guaranteeing the systematic reduction of canopy cover in the very alleys and sidewalks that children and families use daily—corridors already documented as sites of significant traffic danger²¹—the policy actively degrades their health and environment, representing a material conflict with the place-based protections established by the Board of Supervisors in the Planning Code. In addition, the [Western Soma Area Plan](#) section 7.2.4 prescribes to continue working with the “South of Market Alley Improvements Programs so new development can contribute to planting trees.”⁹

Enacted Without Public Oversight: Beyond its problematic content, the order represents a failure of governance. It was enacted by the signature of a single department head, Mohammed Nuru, who was subsequently convicted of public corruption. The policy received no consistency review with the General Plan, no vote from the Board of Supervisors, no impact analysis, and no public input or deliberation. This lack of oversight allowed a damaging, inequitable policy to be implemented without the checks and balances essential to sound public administration.



This image illustrates the two futures for SoMa's streets: (left) the vibrant canopy, with legal ADA clearance, that we are fighting to preserve, and (right) the bleak, concrete future that under PWO 187246 mandates.

The order's impact is devastating. A GIS analysis shows it guarantees the future elimination of 45% of all alley trees city-wide⁵. The burden falls hardest on Environmental Justice Communities.

In the SoMa West CBD alone, the policy guarantees the elimination of 764 trees—a staggering 24% of the neighborhood's entire tree canopy, driving it to the lowest in the city.⁵



View of District 6. To-be-eliminated trees (red) represent a significant portion of the canopy under the Supervisor Matt Dorsey's stewardship. This reveals a clear pattern of environmental inequity, with this highly vulnerable neighborhood bearing the brunt of future canopy loss.



View of SoMA West's alleys: A block-by-block analysis shows a dense concentration of to-be-eliminated trees (red) in SoMa's core residential alleys. This is 75% of our alley trees.

The eventual outcome of this policy ensures that SoMa, already one of the least green neighborhoods, will have the lowest tree canopy in the entire city by far²².

Neighborhood	2022 Canopy Cover	Public Works Order Trees Loss	Future Canopy Cover
South of Market	2.7%	18%	2.2%
Tenderloin	2.6%	4%	2.5%
Chinatown	2.8%	1%	2.8%
Mission Bay	3.2%	0%	3.2%
Nob Hill	4.2%	7%	3.9%
Bayview Hunters Point	4.2%	1%	4.2%
Financial District/South Beach	4.5%	3%	4.4%
Visitacion Valley	4.7%	4%	4.6%
Sunset/Parkside	5.2%	0%	5.2%
Outer Mission	5.5%	2%	5.4%
Excelsior	6.2%	0%	6.2%
Russian Hill	6.5%	5%	6.2%
Oceanview/Merced/Ingleside	6.7%	0%	6.7%
Mission	6.9%	3%	6.7%
Outer Richmond	6.9%	0%	6.9%
Potrero Hill	6.9%	0%	6.9%
Portola	7.0%	1%	6.9%
Marina	7.7%	4%	7.4%
Japantown	7.6%	1%	7.6%
North Beach	7.8%	2%	7.7%
Hayes Valley	9.0%	10%	8.1%
Treasure Island	8.2%	0%	8.2%
Bernal Heights	11.9%	20%	9.5%
Lone Mountain/USF	9.8%	1%	9.8%
Inner Richmond	10.9%	0%	10.9%
Presidio Heights	10.9%	0%	10.9%
Pacific Heights	11.0%	0%	11.0%
Western Addition	11.6%	4%	11.2%
San Francisco City Average	12.8%	3%	12.3%
Seacliff	13.2%	0%	13.2%
Castro/Upper Market	14.1%	2%	13.8%
West of Twin Peaks	15.0%	1%	14.9%
Noe Valley	15.7%	2%	15.4%
Lakeshore	17.3%	0%	17.3%
Glen Park	25.7%	19%	20.9%
Haight Ashbury	21.5%	0%	21.5%
Inner Sunset	22.0%	1%	21.9%
Twin Peaks	25.2%	8%	23.3%
Presidio	31.8%	0%	31.8%
Lincoln Park	38.2%	0%	38.2%
McLaren Park	40.9%	0%	40.9%

This chart projects the direct consequence of PWO 187246, showing that the policy will drive SoMa's tree canopy from one of the lowest in the city to the absolute lowest, exacerbating existing environmental inequities.²²

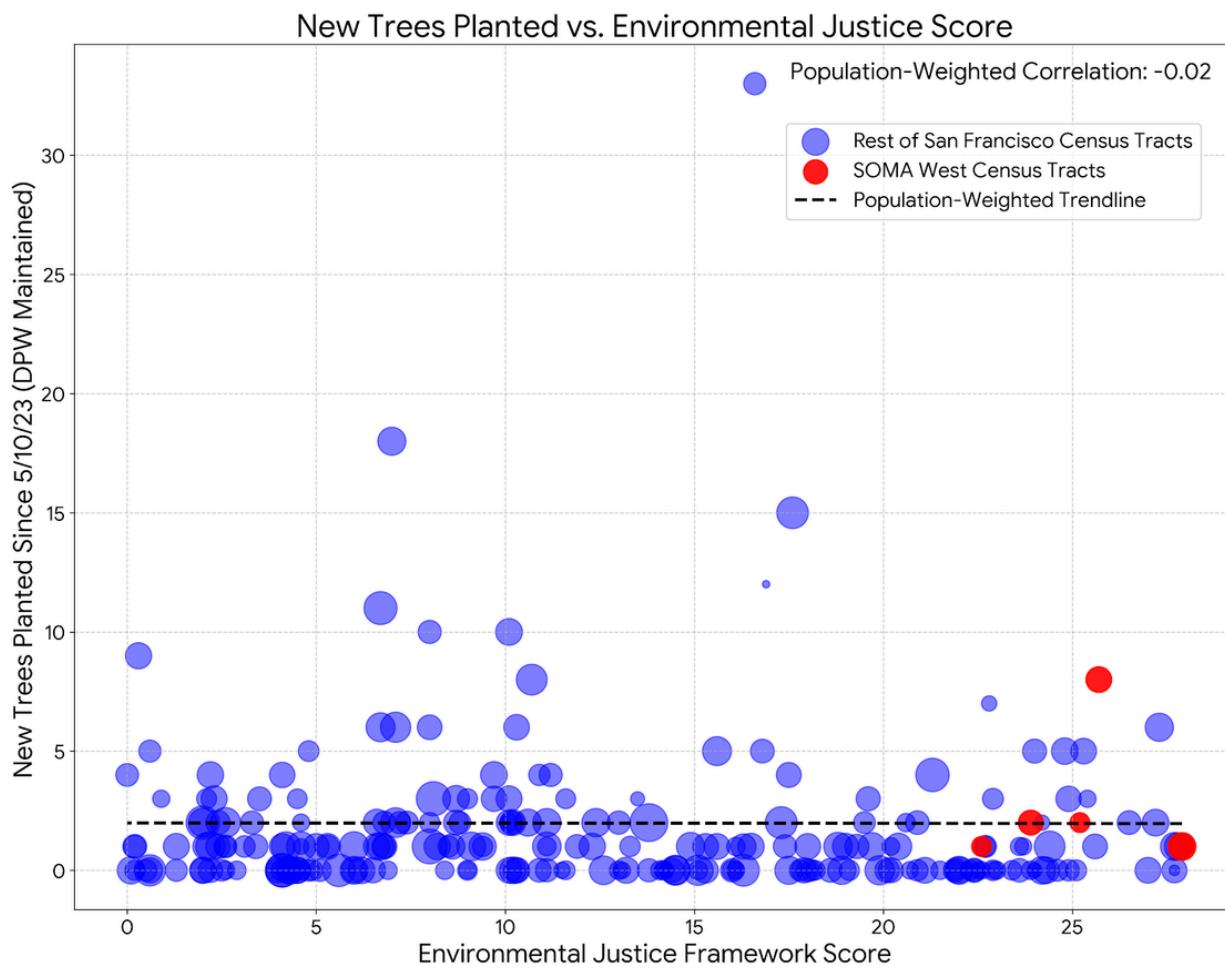
A Climate Policy in Reverse, Falling Behind Peers: The policy creates an irreconcilable conflict with the city's climate goals. In 2014, San Francisco's Urban Forest Plan set an ambitious goal to add 50,000 trees to our urban canopy¹⁰. A decade later, the city has not only failed to make progress, it has gone backward, with 308 fewer trees today than in 2017¹¹. This leaves the city nearly 10,000 trees behind schedule to meet its 2040 climate goals¹¹. San Francisco's canopy remains at just 13.7%¹¹, below peer cities and far short of its goals.

While San Francisco's tree canopy stagnates, our peer cities are moving forward. In June 2025, Sacramento—with a 19% canopy—unanimously adopted a neighborhood [tree equity plan](#) to nearly **double its urban forest**, adding an estimated 500,000 new trees with a **dedicated funding strategy**¹².

A Failure in Discretionary Action

San Francisco's Environmental Justice Framework was adopted by the Board of Supervisors on May 9, 2023, via Ordinance No. [084-23](#). This framework was then incorporated into the City's General Plan.

An analysis of 409 discretionary²⁰ tree plantings between May 10, 2023, and the present day reveals a statistically negligible correlation (-0.02) between a neighborhood's Environmental Justice Score and the number of trees planted⁵. This confirms the city has not prioritized planting in EJCs as required by law¹³, and instead distributed trees randomly with respect to environmental burden.



The city has failed to prioritize tree planting where it's needed most. Since adopting the EJF, tree planting shows no correlation with environmental burden—contradicting the framework's legal mandate.

The stakes are especially high in SoMa, where the Environmental Justice Community (EJC) designation is driven in large part by high exposure to PM2.5 air pollution, as identified in the state-defined Air Pollution Exposure Zone (APEZ)⁴. Trees are among the most effective, community-scale interventions to mitigate PM2.5 exposure. Their absence is not just an aesthetic loss, it is a public health failure.

A Misallocation of Critical Funding

This pattern of inequity culminates in a clear and indefensible failure of governance: the misallocation of critical federal funding. In 2023, San Francisco was awarded a \$12 million federal grant under the Inflation Reduction Act, specifically earmarked for planting trees in the city's most vulnerable, low-canopy neighborhoods, including [SoMa](#), Bayview-Hunters Point, and the Tenderloin¹⁴.

The city had a legal and moral obligation to use its own, recently adopted **Environmental Justice Framework (EJF)**—the only such framework integrated into the legally-binding General Plan—to guide these funds. It failed to do so.

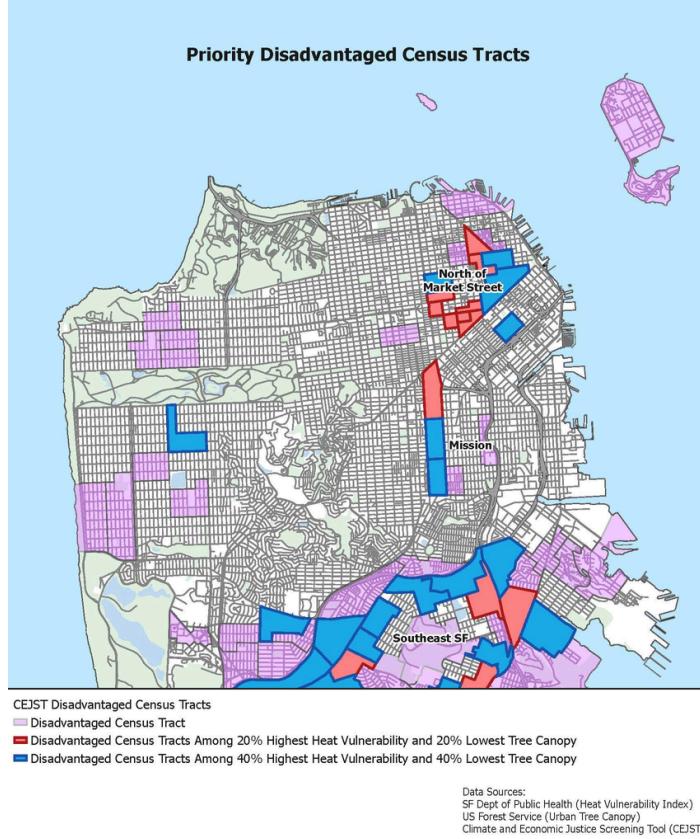
Instead, Public Works created its own non-compliant framework, combining two tools that are demonstrably outdated and inferior to the city's own EJF for this purpose:

1. **An Outdated Federal Tool (CEJST):** The federal Climate and Economic Justice Screening Tool is a blunt, national-level instrument that relies on **2010 census tract definitions**. Critically, it **deliberately omits race as a direct input variable**, relying on income as an imperfect proxy.
2. **A Decade-Old Local Tool (HVI):** The city's Heat Vulnerability Index is a limited, single-hazard tool that is over a decade old, with some foundational data from **2013**. Like the CEJST, it also relies on **2010 census data**.

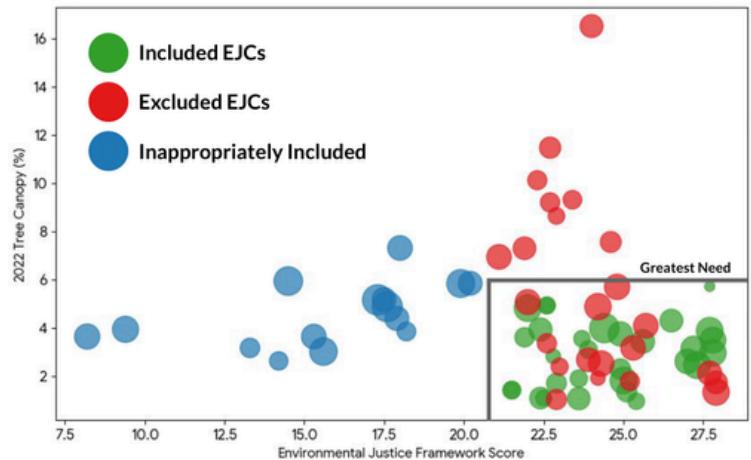
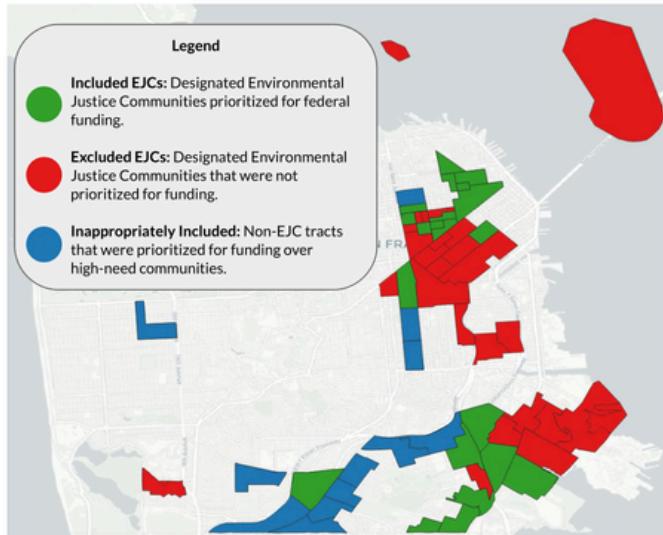
This discretionary²³ decision to use a flawed and outdated methodology directly contradicts the department's legal obligation to adhere to the General Plan. The result is a clear case of administrative malpractice. The city's implementation plan for this grant, the "[3,500 Trees Project](#)," excludes **24 designated Environmental Justice census tracts** (primarily in SoMa, the Tenderloin, Bayview, Lower Nob Hill, and the Mission), while actively funding 12 tracts that do not qualify as EJCs.

The consequences of this misdirection are borne directly by residents; with no publicly funded support, those in our neighborhood are blocked by prohibitive costs, recently pooling their money at [\\$800 per tree](#) or not planting at all.

The exclusion of SoMa West is the most telling example of this non-compliance. The neighborhood qualifies as "Disadvantaged" under both the city's own EJF and the federal [CEJST framework](#)—the very criteria for the grant. Yet, despite its clear eligibility and [higher heat index scores](#) than many selected areas, SoMa West was inexplicably removed from the priority map. This is not a passive oversight, but an active violation of the General Plan's mandate to close the community's environmental equity gap.



The City's Stated Priorities. This is the city's official map for its \$12 million federally-funded "3500 Trees Project." The colored tracts are the neighborhoods the city has prioritized for this investment, based on its chosen framework of the CEJST and a local Heat Vulnerability Index.



Left: Map of Excluded Environmental Justice Communities. **Right:** Many census tracts that have higher environmental burden **and** lower canopy have been excluded from the grant.

This analysis reveals a direct conflict between the city's grant allocation and its legally-binding Environmental Justice Framework. It proves that the city's flawed methodology wrongfully excludes high-need, low-canopy designated EJC census tracts (red) while improperly including 12 non-EJC tracts (blue).

3. Solutions: Expert-Vetted and Actionable

These challenges are solvable. Here we present suggested solutions for re-planting on narrow streets and distributing future planting equitably, drawing from the help of experts and other successful city case studies.

Addressing Operational Concerns with Proven Precedents

- **ADA Clearance for Young Tree Limbs:** A primary operational concern is ensuring that the limbs of young trees do not obstruct the path of travel for pedestrians, particularly those who are visually impaired. This is a standard and manageable task, not a barrier to planting. FUF's existing contract with the City already provides the solution: a required three-year establishment period for every tree they plant, which includes all necessary follow-up care and structural pruning for clearance.
- **Community Stewardship and Watering:** The "Mission Verde" program in the Mission district has successfully watered and established over 100 new trees, demonstrating a viable, low-cost model for community-government partnership.¹⁵
- **Engineering Solutions to Prevent Vehicle Damage:** High tree mortality from vehicle strikes should be treated as a solvable traffic engineering challenge, not an unavoidable outcome. A comprehensive approach includes:
 - **Traffic Calming:** Integrating trees with measures like chicanes and speed tables reduces vehicle speeds, the primary cause of severe damage.¹⁶
 - **Geometric Redesign:** Where feasible, planting trees in the parking lane within engineered curb extensions or bulb-outs offers the highest degree of protection and completely bypasses sidewalk width restrictions.¹⁷
 - **Targeted Physical Protection:** As a lower-cost alternative, proactively using tree guards and bollards can shield trees from impact. This approach should be used judiciously, as the concrete footings they often require can reduce soil volume and complicate future stump removal and replacement planting.

Technical Solutions for Narrow Sidewalks

A primary technical objection to planting in narrow sidewalks is concern over tree well size and long-term root health. However, this concern is based on an outdated focus on surface opening size rather than total available soil volume. Modern urban forestry provides proven solutions:

- **Focus on Soil Volume, Not Just Surface Area:** Best practices include adopting flexible minimums for tree wells and using below-grade solutions like **structural soils** and **soil cells** to provide ample room for root growth, ensuring long-term health even in constrained spaces.¹⁸
- **Utilize Modern, Permeable Materials:** Instead of impermeable concrete, the city can embrace modern greening techniques like **Flexi-Pave** (an innovative, porous, and flexible paving material made from recycled tires) or other **permeable pavers** used successfully in cities like Chicago.¹⁹ These materials allow critical air and water to reach the roots, preventing sidewalk damage.
- **Select Appropriate Species:** A definitive list of appropriate, narrow-form, and resilient tree species has been developed specifically for SoMa's unique conditions (see Appendix).

A Canopy Gap Case Study: The Los Angeles Urban Forest Equity Collective

San Francisco's systemic failures are not unique. Los Angeles faced a similar legacy of environmental injustice rooted in discriminatory policies. In response, Los Angeles created a cross-sector collaborative, the Urban Forest Equity Collective (UFEC), to reverse these inequities. The UFEC's work provides a proven and actionable roadmap for San Francisco, offering direct solutions to the city's flawed policies, failed implementation, and inequitable funding.

A Data-Driven Model for Equitable Investment: San Francisco's discretionary tree plantings demonstrably ignore its Environmental Justice Framework, while a \$12 million federal grant was misallocated using an outdated methodology. The UFEC model offers a direct solution. Its Neighborhood Prioritization Framework is a transparent, data-driven process that directs resources to areas of greatest need, a system since adopted by the Los Angeles Office of Forest Management.

The process systematically filters all census tracts based on four clear stages:

1. **Physical and Economic Need:** It first identifies tracts with low canopy cover, high impervious surfaces, and low median income.
2. **Environmental Exposure:** It then narrows the list to areas with high vulnerability to extreme heat and air pollution.
3. **Socio-Demographic Need:** The list is further refined using social vulnerability indicators, including poverty, education levels, and a history of redlining.
4. **Qualitative Feasibility:** A final assessment with community partners gauges on-the-ground readiness, ensuring projects are directed where they will be welcomed and successful.

This data-driven approach ensures that investments are legally compliant, defensible, and effective at closing the canopy gap.

A Coalition for Accountability. The flawed Public Works Order and misdirected funding in San Francisco were enabled by a lack of public oversight. The UFEC model is built on a foundation of collaboration designed to prevent such failures. Its power comes from its structure as a cross-sector consortium, uniting city agencies (Public Works, Recreation and Parks), academic institutions (UCLA, USC), non-profits (TreePeople), community groups (South LA Tree Coalition), and state and federal partners (CAL FIRE, USDA Forest Service).

Local universities provided the academic rigor and data analysis that made the collective's frameworks so effective and defensible. This evidence-based approach proved so successful that the Los Angeles Office of Forest Management formally adopted UFEC's framework to guide its planning. The collective's research is now the foundation for the city's first comprehensive Urban Forest Management Plan, marking a successful transfer of innovation directly into the core of city government. The model also builds trust through initiatives like the "Tree Ambassador" program, which trains and compensates residents to lead greening efforts in their own neighborhoods.

For San Francisco, establishing a similar collective is a critical next step. Such a body could execute a "Phased Path to Accountability and Action," develop a new technical standard for narrow streets, and guide a citywide "Close the Gap" initiative. By adopting the UFEC model, San Francisco can move from a state of systemic failure to one of national leadership in urban forest equity.

Resources: [Website](#) | [Prioritization Map](#) | [Methodology & Recommendations](#) | [Streetscape Designs](#) | [Infographic](#)

4. A Phased Path to Accountability and Action

Following a productive on-site meeting on August 1, 2025, leadership from the Department of Public Works has committed to a pilot program to re-evaluate the 7.5-foot rule and explore new planting solutions on a single block in SoMa.

While this is an encouraging first step, a block-level pilot does not fix a broken city-wide policy. This pilot must be seen not as the final solution, but as the urgent catalyst for a much larger reckoning. The learnings from this pilot must be scaled to allow for the replanting of hundreds of lost trees across all of San Francisco's historic, narrow streets. But even a full re-stocking of our empty wells is not enough. True success requires us to finally address the profound inequity in our urban forest. The following phased plan outlines the path to get there.

- **Phase 1: Immediate Corrective Actions (0-3 Months)**

- **Issue Moratorium on Concrete Fills:** The Director of Public Works should issue an immediate moratorium on filling empty tree wells with concrete, preserving these valuable sites for planting.
- **Launch a Formal Inquiry into Grant Allocation:** The Board of Supervisors, in partnership with the City Controller, must launch a formal inquiry into the misallocation of the \$12 million federal grant. The city's use of outdated frameworks that excluded 24 designated Environmental Justice Communities is a serious issue of administrative non-compliance that demands a public accounting.
- **Convene a Technical "Narrow Streets Working Group":** The Urban Forestry Council, as the city's expert body on arboriculture, should convene a 'Narrow Streets Working Group' with representatives from Public Works, the Planning Department, Friends of the Urban Forest, and community members. The group should develop a new, evidence-based technical standard for planting on narrow sidewalks.

- **Phase 2: Develop and Fund the New Standard (3-9 Months)**

- **Launch the "SoMa Green Streets Pilot Program":** Dedicate a portion of the federal funding to a pilot in SoMa to test and implement the new standards developed by the Working Group.
- **Develop a "Close the Gap" Mandate:** To comply with the General Plan's Environmental Justice Framework, which instructs the city to "Develop neighborhood specific targets for tree canopy cover," The Mayor's Office and the Board of Supervisors must task the Planning Department and the Commission on the Environment with developing a formal 'Close the Gap' mandate. It should be:
 - **Performance-Driven:** For instance, have a stated goal of reducing the canopy gap between each Environmental Justice Community and the citywide average by 50% within ten years.
 - **Funded:** Be supported by a dedicated, ongoing funding source and create a permanent, zero-cost program that provides and plants trees for residents in any compliant location.

- **Phase 3: Citywide Implementation and Codification (9+ Months)**

- **Codify the New Technical Standard:** The city must formally amend the Public Works Code to replace the flawed rule. The new, codified standard developed by the Working Group should:
 - Define new minimum basin requirements and the conditions under which it applies.
 - Integrate modern mitigation strategies like planting grates to prevent trip-and-fall hazards and structural soil cells to avoid hardscape damage.
 - Update city streetscape designs, creating a template for re-greening all of the city's narrow streets.
- **Launch the 'Close the Gap' Initiative:** With the new technical standard codified and the "Close the Gap" mandate and its funding in place, the city can officially launch, using the new mandate to guide a proactive planting program that prioritizes the highest-need Environmental Justice Communities.

This is a critical moment for San Francisco. By taking these decisive actions, the city can move from a state of non-compliance to one of active leadership, finally ensuring a healthy urban forest is a right for all residents, not a privilege for a few.

Appendix: Expert-Recommended Species for SoMa Alleys

Alley Sidewalk Trees

Common Name	Scientific Name	Mature Height	Mature Width	Notes
California lilac	<i>Ceanothus 'Ray Hartman'</i>	10-20 ft	10-15 ft	CA native. Rounded canopy can interfere with pedestrian path of travel when young
Weeping bottlebrush	<i>Callistemon viminalis</i>	20 ft	15 ft	Make sure not to source popular dwarf varieties. Weeping form often requires more training
Pink dawn chitalpa	<i>x Chitalpa tashkentensis 'Pink Dawn'</i>	25 ft	20 ft	Prefers full sun
Desert willow	<i>Chilopsis linearis</i>	25 ft	10-20 ft	Prefers full sun, good drainage
Washington hawthorn	<i>Crataegus phaenopyrum</i>	25 ft	20 ft	Has thorns, rounded canopy
Persian ironwood (columnar)	<i>Parrotia persica 'Persian Spire'</i>	25-30 ft	10-15 ft	Experimental in SF. Columnar varieties may be hard to source. May be better for bulb-outs

Bulb-out Trees

Common Name	Scientific Name	Mature Height	Mature Width	Notes
Brisbane box	<i>Lophostemon confertus</i>	40-50 ft	20-30 ft	Staple of downtown SF, possibly overplanted. Can get large
Sweetshade	<i>Hymenosporum flavum</i>	30-40 ft	15-20 ft	Wind tolerance can be an issue; irregular branching aesthetic
Catalina ironwood	<i>Lyonothamnus floribundus</i>	40 ft	15-20 ft	CA native
Chilean soapbark	<i>Quillaja saponaria</i>	40 ft	15-25 ft	Best for bulb-outs due to large trunk & root flare. Can be hard to source
Musashino sawleaf zelkova	<i>Zelkova serrata 'Musashino'</i>	40 ft	10-15 ft	Weak, narrow branch attachment angle

References

1. City and County of San Francisco. (2022). [Environmental Justice Framework Memo](#) (p. 12).
2. City and County of San Francisco. (2022). [Environmental Justice Framework Memo](#) (p. 1).
3. City and County of San Francisco. (2022). [Environmental Justice Framework Memo](#) (p. 11).
4. City and County of San Francisco. (2024, February). [Environmental Justice Communities \(EJC\) Map Technical Documentation](#) (p. 4).
5. Aukland, S. (2025). *GIS Data Analysis on the Impact of Public Works Order 187246*. Leveraging joined Trees, Street, and Block data from SF Open Data.
6. City and County of San Francisco. (2022). [Environmental Justice Framework Memo](#) (p. 13).
7. City and County of San Francisco. (2018, March 23). [San Francisco Public Works Order No. 187246](#) (Section V, B-ii, p. 10).
8. City and County of San Francisco. [San Francisco Planning Code § 249.40A - SoMa Youth and Family Special Use District](#).
9. City and County of San Francisco. [General Plan - Western SoMa Area Plan](#).
10. City and County of San Francisco Planning Department. (2014). [San Francisco Urban Forest Plan, Phase 1: Street Trees](#) (p. 17).
11. City and County of San Francisco Urban Forestry Council. (2024). [2024 Annual Urban Forest Report](#) (pp. 3, 11, 14).
12. Clift, T. (2025, June 25). [Sacramento adopts Urban Forest Plan. Here's what makes it so ambitious](#). The Sacramento Bee.
13. City and County of San Francisco. (2022). [Environmental Justice Framework Memo](#) (p. 15).
14. City and County of San Francisco. (2023, April 27). [San Francisco Awarded \\$12 Million Federal Grant to Plant Thousands of New Street Trees to Fight Climate Change](#).
15. San Francisco Environment Department. [Mission Verde Watering Program](#).
16. WeConservePA. (2022). [Traffic Calming](#).
17. City of Portland. [Street Tree Planting Standards](#) (Appendix F, p. 1). Portland Parks & Recreation, Urban Forestry.
18. National Association of City Transportation Officials (NACTO). [Urban Street Design Guide](#).
19. City of Chicago Department of Transportation. (2010). [The Chicago Green Alley Handbook](#) (pp. 1-4).
20. City & County of San Francisco (2025). DataSF Open Data Portal Street Tree List, accessed August 2, 2024. Discretionary is defined as trees marked as DPW Maintained. Excludes all trees where "qLegalStatus" is Permitted Site, Significant Tree, Undocumented, or those required by Section 806d Development Rules.
21. South of Market Community Action Network (SOMCAN). (2023). [Urban Air Pollution Impacts on Health, Wellness & Safety in the South of Market Neighborhood of San Francisco](#).
22. CAL FIRE & USDA Forest Service, [California Urban Tree Canopy: 2022 Canopy Cover and Change Analysis](#), released April 2025.
23. USDA Forest Service, Inflation Reduction Act [Notice of Funding Opportunity \(NOFO\)](#) and [Grant Definitions](#) clearly state "Multiple tools may be used" including "other government sponsored vulnerability tools which inform metrics applicable to the scope of work" (2023).



September 23, 2025

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

RE: San Francisco Urban Tree Canopy and Public Health

Dear Mayor Lurie,

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

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

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

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

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

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

Sincerely,

Arianne Teherani, PhD
Founding Co-Director
Arianne.Teherani@ucsf.edu

Sheri Weiser, MD, MPH
Founding Co-Director
Sheri.Weiser@ucsf.edu

Annemarie Charlesworth, MA
Research Specialist
Annemarie.charlesworth@ucsf.edu

cc: Staci Slaughter, staci.slaughter@sfgov.org
Carla Short, Carla.Short@sfdpw.org
David Moore, David.Moore@sfdpw.org
Shaun Aukland, shaun.aukland@gmail.com
Amiee Alden, Amiee.Alden@ucsf.edu



TO The Urban Forestry Council Hearing (September 26, 2025)

MANDATE FOR TREE PRESERVATION IN SAN FRANCISCO

- **Whereas**, San Francisco has a legally-binding Environmental Justice Framework in its General Plan that requires the City to redress the inequitable distribution of tree canopy in its most burdened neighborhoods;
- **Whereas**, a flawed 2018 Public Works Order (187246) guarantees that thousands of trees across San Francisco will be lost by banning their replacement on our historic, narrow sidewalks;
- **Whereas**, San Francisco has failed to meet its own stated goal of adding 30,000 new trees to the urban forest;
- **Whereas**, as a result of these policy failures, the city's total tree canopy has shrunk significantly since 2018;
- **Therefore be it Resolved**, that the CSFN calls on the City to work with communities to create a new, modern standard for planting trees on historic, narrow streets; and
- **Be it Further Resolved**, that the CSFN supports a "Close the Gap" mandate that establishes clear, neighborhood-specific targets for tree canopy and provides the dedicated funding necessary to achieve them.

Deborah Murphy
President CSFN
Coalition for San Francisco Neighborhoods

The **Coalition for San Francisco Neighborhoods** is made up of the following member organizations from across the city:

District 1

- University Terrace Association (UTA)

District 2

- Cow Hollow Association (CHA)
- Jordan Park Improvement Association (JPIA)
- Laurel Heights Improvement Association (LHIA)
- Marina Community Association (MCA)
- Pacific Heights Residents Association (PHRA)

District 3

- Barbary Coast Neighborhood Association (BCNA)
- Telegraph Hill Dwellers (THD)

District 4

- La Playa Village Coalition
- Mid-Sunset Neighborhood Association (MSNA)
- Sunset-Parkside Education & Action Committee / SPEAK

District 5

- Cole Valley Improvement Association (CVIA)

District 6

- Rincon Point Neighbors Association (RPNA)

District 7

- Forest Knolls Neighborhood Organization (FKNO)
- Golden Gate Heights Neighborhood Association (GGHNA)
- Greater West Portal Neighborhood Association (GWPNA)
- Midtown Terrace Homeowners Association (MTHA)
- Miraloma Park Improvement Club (MPIC)
- Parkmerced Action Coalition (PmAC)
- Sunset Heights Association of Responsible People / SHARP

District 8

- Corbett Heights Neighbors (CHN)
- Diamond Heights Community Association (DHCA)
- Dolores Heights Improvement Club ((DHIC)

District 9

- East Mission Improvement Association (EMIA)

District 11

- Excelsior District Improvement Association (EDIA)
- Oceanview/Merced Heights/Ingleside – Neighbors In Action (OMI-NIA)



September 14, 2025

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

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

Mayor Lurie,

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

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

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

SOMA West's Canopy Deficit: A Public Health Emergency

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

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

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

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

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

The Solution: A San Francisco Tree Equity Ordinance

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

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

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

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

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

Sincerely,

SOMA West Neighborhood Association

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

Sources

1. SF advances 'One City Shelter Act' ordinance - Local News Matters, July 31, 2025, <https://localnewsmatters.org/2025/07/31/sf-advances-one-city-shelter-act-ordinance/>
2. San Francisco Family Zoning Plan | SF Planning, accessed September 7, 2025, <https://sfplanning.org/sf-family-zoning-plan>
3. Concrete Over Canopy - How San Francisco Is Failing Its Environmental Justice Communities - Shaun Aukland, August 17, 2025, sftrees.short.gy/equity
4. Air Pollutant Exposure Zone | DataSF, accessed September 7, 2025, <https://data.sfgov.org/Geographic-Locations-and-Boundaries/Air-Pollutant-Exposure-Zone/t65d-x6p8>
5. 6 Ways Urban Trees Benefit Our Climate and Health - Conservation Law Foundation, August 4, 2023, <https://www.clf.org/blog/urban-trees-benefit-our-climate-and-health/>
6. SF Environmental Justice Communities Map: Technical Documentation | SF Planning, March 2023, https://www.sf.gov/sites/default/files/2024-02/exhibitg_23_03_10_ejc_map_technical_documentation_transmittal_w_app.pdf

October 7, 2025

Mayor Daniel Lurie
Office of the Mayor
City Hall, Room 200
San Francisco, CA 94102
Daniel.Lurie@sfgov.org

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

Dear Mayor Lurie,

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

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

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

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

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

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

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

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

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

Sincerely,



Angelica Cabande
Executive Director
South of Market Community Action Network (SOMCAN)

CC:

Supervisor Matt Dorsey, Matt.Dorsey@sfgov.org
Supervisor Bilal Mahmood, Bilal.Mahmood@sfgov.org
Supervisor Jackie Fielder, Jackie.Fielder@sfgov.org
Carla Short, Director of San Francisco Public Works, Carla.Short@sfdpw.org
Jesus Lozano, Urban Forestry Council Coordinator, Jesus.Lozano@sfgov.org



Visitacion Valley Engage Green
anne@visvalleygreenway.org
www.visitacionvalleyengagegreen.com

Dear Mayor Lurie and Supervisor Walton,

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

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

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

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

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

Thank you for your leadership and your consideration.

Sincerely,

Anne Seeman
Visitacion Valley Engage Green (VVEG)

HAYES VALLEY NEIGHBORHOOD ASSOCIATION

September 3, 2025

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

Dear Mayor Lurie and Supervisor Mahmood,

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

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

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

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

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

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

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

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

Sincerely,

The Board of the Hayes Valley Neighborhood Association



David Robinson
President
President@hayesvalleysf.org

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

23 September 2025

San Francisco Tree Equity Ordinance Request

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

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

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



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

Sincerely,

The South Beach | Rincon | Mission Bay Neighborhood Association Board

Alice Rogers, President

Gary Pegueros, Vice President /Secretary

Michael Adams, Director

Bruce Agid, Director

Shelley Costantini, Director

Mike Linksvayer, Director



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

September 30, 2025

Honorable Mayor Lurie,

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

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

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

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

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

Sincerely,

Lauren Weston
Executive Director
Acterra: Action for a Healthy Planet

Cc:

Staci Slaughter, Staci.Slaughter@sfgov.org
Alicia John-Baptiste, A.John-Baptiste@sfgov.org
Carla Short, Carla.Short@sfdpw.org
David Moore, David.Moore@sfdpw.org

Subject: Repeal of Public Works Order 187246



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

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

Greetings, Mayor Lurie,

We're writing today to voice our concern about the 2018 Public Works order 187246, which says if a street tree is removed, it can't be re-planted if the sidewalk is less than 7.5 feet wide.

This would cover a very large portion of the smaller streets in our Glen Park neighborhood.

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

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

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

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

Please, please make it easier for the community to expand habitat in our San Francisco concrete jungle. It's essential to see the beauty of nature where we navigate every day.

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

Best Regards,
-Carol Hansen and Paul Muldown
Stewards, Bernal Cut Project

www.bernalcut.org



From: [Shaun Aukland](#)
To: [DPW-Public Works Commission](#)
Cc: [Short, Carla \(DPW\)](#)
Subject: Re: Follow-Up to Public Works Commission Comment
Date: Friday, December 19, 2025 10:17:05 AM
Attachments: [12.16.25 Request for Inquiry into San Francisco's Compliance with SB 1000 and Environmental Justice Protections \(1\).pdf](#)

Hi Bob & Public Works Commissioners,

Thank you for the update and forwarding that message. Since my public comment, there has been a major development that we'd like to bring to the Public Works Commission's immediate attention. Earlier this week, Assemblymember Matt Haney formally requested that Attorney General Rob Bonta open an inquiry into the Department of Public Works' urban forestry practices.

The Assemblymember's request (attached) raises serious concerns about the Department's compliance with state civil rights and environmental justice laws ([SB 1000](#)). Specifically, it questions whether the Department's practice of withholding green infrastructure based on "survivability" or "social burden" effectively treats neighborhoods like SOMA as containment zones, violating state mandates to reduce health disparities. As you know, these are the very comments Director Short made during the meeting last week, characterizing these neighborhoods as "inhospitable". We have referred the transcript of the meeting to the Attorney General's office.

While the operational oversight of trees may sit with the Sanitation and Streets Commission, the legal and governance compliance of the Department of Public Works is the responsibility of this body. What I experienced last week was not a Commission engaged in oversight, but one that was quick to dismiss the concerns on their merits, and instead come to Public Works defense, especially with Gerald Turner's comment regarding the Street Tree Nursery. I will again remind the commission that a storage depot for trees, closed to the public, located beneath two freeways, is not where our families and children live, nor is it beautification. We have over 500 empty tree wells in our neighborhood, by Public Works' [own count](#). Please see [CBS Bay Area news coverage](#) on the problem at hand.

Please ensure this message, and the attachment from the Assemblymember is also provided to Chair Zoghbi and the Commissioners.

Best regards,

Shaun Aukland
[FairTrees.org](#)

On Wed, Dec 17, 2025 at 10:04 AM DPW-Public Works Commission
<publicworks.commission@sfdpw.org> wrote:

Hi Shaun,

Thank you for your comments last week and your follow up. I will share your letter with Chair Zoubi and include it in the commission's correspondence log. I will also forward it to the Sanitation and Streets Commission, which has more direct jurisdiction over the Bureau of Urban Forestry.

All the best,

Bob Fuller – Commission Affairs Manager

From: Shaun Aukland <shaun.aukland@gmail.com>

Sent: Wednesday, December 17, 2025 9:13 AM

To: DPW-Public Works Commission <publicworks.commission@sfdpw.org>

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

Subject: Follow-Up to Public Works Commission Comment

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

Dear President Post, Chair-Elect Zoghbi, and Commissioners,

Thank you for the opportunity to speak during General Public Comment at your recent meeting.

During my comments, I referenced data regarding the systemic inequity facing SOMA West and other Environmental Justice Communities. To ensure the Commission has the full context for its oversight duties, I am formally submitting the attached documents for the record:

- **"Concrete Over Canopy" Report:** A data-driven analysis detailing how District 6 has been systematically excluded from funding (including the \$12M IRA Grant and Prop L), resulting in the lowest tree canopy in the city (2.7%).
- **Coalition Letters of Support:** Signed by 35+ organizations and 800+ residents, calling for a legislative solution to these disparities. You will see the first one is UC Center for Climate, Health, and Equity.

As stated in my public comment, these documents substantiate the following concerns:

- **Funding Exclusion:** Despite generating 24% of the city's sales tax revenue, District 6 received 0% of the recent Prop L planting allocation, while District 10 received 100%. These funds were publicly announced to be for Districts 5, 6, and 10. This was in addition to the \$12M in Inflation Reduction Act funds that were directed away from SOMA.
- **Neglect:** Public Works documents admit to 500+ empty tree wells in SOMA, yet has no plan to fill them.
- **Accountability:** Director Short admitted that the Department has no Equity Plan, and personally committed to working with us on a Tree Equity Plan during an in-person meeting back in September, but the department has since ceased communication on this promise. Such plans exist in other major cities like Oakland, Sacramento, and

Los Angeles.

Finally, I wish to offer a factual correction regarding the discussion during the Director's Report: The SOMA Nursery is Not "Beautification": It was suggested that the Street Tree Nursery in SoMa serves as a beautification project. This is incorrect. It is a locked, chain-linked industrial facility under a freeway. Counting an inventory depot as "neighborhood greening" distorts the reality that our residents live in a concrete heat island.

Lastly, regarding the "inhospitable" narrative -- we are concerned by the Director's characterization of neighborhoods like ours as "inhospitable." This rhetoric mirrors the department's written policy allowing planting deferrals near homeless shelters. Using social challenges as a justification to withhold environmental investment effectively codifies these neighborhoods as containment zones.

We ask the Commission to review the attached report and exercise its oversight to ensure the department follows the General Plan's equity mandates.

Sincerely,

Shaun Aukland
FairTrees.org

[Attachments: Concrete Over Canopy Report.pdf, Coalition Letters.pdf]

STATE CAPITOL
P.O. BOX 942849
SACRAMENTO, CA 94249-0017
(916) 319-2017
FAX (916) 319-2117

E-MAIL
Assemblymember.Haney@assembly.ca.gov

DISTRICT OFFICE
455 GOLDEN GATE AVENUE, ROOM 14300
SAN FRANCISCO, CA 94102
(415) 557-3013
FAX (415) 557-3015



December 16, 2025

Rob Bonta, Attorney General of California
1300 "I" Street Sacramento, CA 95814
Attn: Bureau of Environmental Justice

Re: Request for Inquiry into San Francisco's Compliance with SB 1000 and Environmental Justice Protections

Dear Attorney General Bonta, I am writing to bring to your attention serious concerns raised by my constituents in Assembly District 17 regarding the City and County of San Francisco's adherence to state environmental justice laws, specifically Senate Bill 1000. My constituents have provided data-driven analysis suggesting that San Francisco's implementation of its Environmental Justice Framework may be insufficient to meet the state's requirements to reduce health risks in disadvantaged communities. Specifically, they point to a pattern where essential green infrastructure, specifically street trees, is being withheld from Environmental Justice Communities based on subjective criteria such as "survivability" or concerns about vandalism. This practice raises a critical question of whether these neighborhoods are effectively being treated as "containment zones" for environmental and social burdens. By citing existing challenges as a reason to deny new investment, the city risks perpetuating the very inequities that SB 1000 was designed to redress. The consequences of this neglect are stark. Hundreds of tree wells in District 17 sit empty, while federal and local funding explicitly designed for equity is systematically directed to other parts of the city. As a result, residents in these designated disadvantaged census tracts are forced to pay for street trees out-of-pocket, effectively subsidizing the city's failure to provide basic environmental health protections.

Furthermore, constituents have documented that the city's Environmental Justice Framework explicitly disclaims being a binding policy document. If accurate, this would undermine the intent of SB 1000 to create enforceable, action-oriented policies. Given these concerns, I respectfully request that the Bureau of Environmental Justice review these claims to ensure that San Francisco is fully compliant with both the letter and the spirit of state environmental justice laws, and that all communities in my district receive the equitable protections they are owed.

STATE CAPITOL
P.O. BOX 942849
SACRAMENTO, CA 94249-0017
(916) 319-2017
FAX (916) 319-2117

E-MAIL
Assemblymember.Haney@assembly.ca.gov

DISTRICT OFFICE
455 GOLDEN GATE AVENUE, ROOM 14300
SAN FRANCISCO, CA 94102
(415) 557-3013
FAX (415) 557-3015



Thank you for your attention to this matter.

Sincerely,

A handwritten signature in blue ink that reads 'Matt Haney'.

Assemblymember Matt Haney
Assemblymember, 17th District