



Meeting Date: May 8, 2025

To: Public Works Commission

Through: Carla Short, Public Works Director
DiJaida Durden, Deputy Director of Operations

From: Jon Swae, Bureau of Urban Forestry, Manager of Contracts & Grants

Subject: Tree Watering and Workforce Development Services - Chapter 21G.8
Sole Source Grant Award - San Francisco Clean City Coalition

Director's Recommendation: Approve a Chapter 21G.8 Sole Source Grant Award for Tree Watering and Workforce Development Services to San Francisco Clean City Coalition in an amount not to exceed \$4,931,307.00 for 730 calendar days to operate and manage a workforce development program to support participants in developing careers beyond the program by connecting them to employment and apprenticeship opportunities at Public Works, other public agencies, non-profit partners, and private companies through experience in tree watering services.

Grant Background:

San Francisco Public Works' Bureau of Urban Forestry is committed to preserving and growing the City's tree canopy. The City and County of San Francisco's Urban Forest Plan set a goal of increasing the street tree population to 155,000 street trees over 20 years. To achieve this goal thousands of new trees must be planted and watered each year to grow the City's street tree population (approximately 125,000 street trees currently). Tree watering provides a valuable workforce development training opportunity. With low barriers to entry, this work can offer temporary employment and career development opportunities leading to stable jobs in urban forestry, landscape maintenance, and related fields. The Tree Watering Workforce Development Grant provides funding to a non-profit organization that can successfully carry out the goals to increase the street tree population while simultaneously providing career pathways for those facing barriers to employment.

The Tree Watering Workforce Development Grant scope of work includes:

Employment Readiness and Job Support Services

- Provide urban forestry job training and skills development
- Conduct workshops and training related to resume writing, job search skills, interview skills, job applications, and using online services to find and apply for jobs
- Connect participants to employment and apprenticeship opportunities at Public Works, other public agencies, non-profit partners, and private companies

Tree Watering Services

- Water up to 2,400 street trees per week to ensure establishment after planting
- Plant up to 600 replacement trees

- Perform watering from a water tank or truck with each tree receiving 25-30 gallons of water per week (20 gallons of water in the Treegator bag and 5-10 gallons on the rootball)
- Replace damaged or missing watering bags and missing tree stakes, cross braces and ties

Solicitation Process: Public Works conducted a competitive solicitation process for Tree Watering and Workforce Development Services on May 9, 2023. Proposals were received on July 5, 2023 with the intention to award one grant. San Francisco Conservation Corps was the highest ranked proposal and was awarded the contract.

Sole Source Justification: The current grantee, San Francisco Conservation Corps, ceased performance of the work under the previously awarded grant on January 31, 2025, necessitating an expedited award to prevent service disruption. Public Works is unable to conduct a competitive process currently due to the urgent nature of the grant, which requires immediate action to ensure continuity of essential services, such as tree watering.

Public Works did conduct a competitive solicitation process approximately two (2) years ago. A Request for Proposals (RFP) was issued May 9, 2023 with a July 5, 2023 proposal due date. Public Works received two (2) proposals for Tree Watering Workforce Development RFP with an intent to award one (1) grant. City staff reviewed all proposals and determined that both were responsive and responsible. The responsive and responsible proposals were then evaluated and scored by a panel comprised of subject matter experts from San Francisco Public Works and UCSF. Proposer San Francisco Conservation Corps was the highest ranked proposal for the Tree Watering Workforce Development RFP based on the panelists scores.

SF Clean City Coalition was the only other Proposer in the aforementioned RFP process conducted. Additionally, as the prior grantee of this program, SF Clean City Coalition has demonstrated a proven track record of successfully completing the scope of work. Their institutional knowledge, experience, and established infrastructure uniquely position them to execute the grant objectives efficiently and without interruption.

Given these circumstances, awarding a sole source grant to San Francisco Clean City Coalition is the most feasible and effective course of action to ensure the timely and successful continuation of program services. This sole source grant award will include watering up to 2,400 trees per week and planting up to 600 trees as well as providing workforce development services over a two-year (24 month) grant period.

Grant Details:

Grant Contract Title:	Tree Watering Workforce Development Grant Program
Grant Award Amount:	\$4,931,307.00
Grant Funding Sources:	<ul style="list-style-type: none"> • Tree Maintenance Fund (TMF) -\$2,506,478.88 • Adopt a Tree -\$986,261.40 • COP -\$344,802.32 • FY23 CIP-\$107,503.00 • Prop L -\$986,261.40

Grant Duration:	730 Calendar Days (24 months)
Grantee Name:	San Francisco Clean City Coalition
CEQA Compliance :	Tree watering according to the 2014 Urban Forest Plan Phase I is subject to Class 4 and Class 8 Categorical Exemptions (CEQA Guidelines Sections 15304(b) and 15308) under the California Environmental Quality Act (“CEQA”).
Additional Information:	N/A
Attachments:	Attachment 1: Sole Source Justification Attachment 2: Staff Report Attachment 3: Proposed Budget for SF Clean City Attachment 4: Score Summary Support (tabulations)

**PUBLIC WORKS COMMISSION
CITY AND COUNTY OF SAN FRANCISCO**

RESOLUTION NO. _____

WHEREAS, San Francisco Public Works' Tree Watering Workforce Development Services grant provides valuable job training and job placement support to San Francisco residents from underserved communities through a workforce development program focused on the weekly watering of up to 2,400 street trees to help implement the San Francisco Urban Forest Plan; and

WHEREAS, On May 9, 2023, San Francisco Public Works issued a Request for Proposals ("RFP") for the Tree Watering Workforce Development Program; and received two proposals in response on July 5, 2023; and

WHEREAS, On September 11, 2023, San Francisco Conservation Corps was awarded the grant but became unable to deliver grant services resulting in termination of the grant by Public Works on January 31, 2025; and

WHEREAS, San Francisco Clean City Coalition ranked second in the Tree Watering Workforce Development RFP; and

WHEREAS, To prevent service disruption Public Works must continue to ensure weekly watering of newly planted street trees with support from non-profit workforce development partners but is unable to conduct a new competitive grant process given the urgency; and

WHEREAS, Tree watering according to the 2014 Urban Forest Plan Phase was determined to be exempt from the California Environmental Quality Act ("CEQA") as a Class Class 4 Categorical Exemption and a Class 8 Categorical Exemption (CEQA Guidelines Sections 15304(b) and 15308) as described in the determination contained in the Commission's files for this resolution; now, therefore, be it RESOLVED, That this Commission approves San Francisco Public Works to execute a Chapter 21G.8 Sole Source grant agreement with San Francisco Clean City Coalition to provide tree watering, planting and workforce development services; and

FURTHER RESOLVED, That this Commission hereby approves a Sole Source grant agreement for Tree Watering Workforce Development in the amount of \$4,931,307.00, with a contract duration of 730 calendar days (24 months) to San Francisco Clean City Coalition.

I hereby certify that the foregoing resolution was adopted by the Public Works Commission at its meeting of _____.

Commission Affairs Manager
Public Works Commission



Carla Short, Director | Director's Office

carla.short@sfdpw.org | T. 628.271.3078 | 49 South Van Ness Ave. Suite 1600, San Francisco, CA 94103

Public Works Award of Sole Source Grant Approval

Director's Recommendation: Request that San Francisco Public Works Commission approve Public Works to execute a Chapter 21G.8 Sole Source grant agreement with San Francisco Clean City Coalition.

Public Works Division/Section: San Francisco Public Works - Bureau of Urban Forestry (BUF)

Project Manager: Jon Swae, Contracts & Grants Manager – Bureau of Urban Forestry (BUF)

Grant Program: Tree Watering Workforce Development Grant Program

Grant Award Amount: \$4,931,307.00

Grant Term: 730 consecutive calendar days

Supplier Name: San Francisco Clean City Coalition

Grant Program Background: San Francisco Public Works' Bureau of Urban Forestry (BUF) is committed to preserving and growing the City's tree canopy. The City of San Francisco's Urban Forest Plan set a goal of increasing the street tree population to 155,000 street trees over 20 years. To achieve this goal thousands of new trees must be planted and watered each year to grow the City's street tree current population of approximately 125,000 street trees. Tree watering provides a valuable workforce development training opportunity. With low barriers to entry, this work can offer temporary employment and career development opportunities leading to stable jobs in urban forestry, landscape maintenance, and related fields. The Tree Watering Grant will provide funding to a non-profit organization who can successfully carry out the goals to increase the street tree population while simultaneously providing career pathways for those facing barriers to employment.

The Tree Watering Workforce Development Grant scope of work includes:

Employment Readiness and Job Support Services

- Provide urban forestry job training and skills development.
- Conduct workshops and training related to resume writing, job search skills, interview skills, job applications, and using online services to find and apply for jobs.
- Connect participants to employment and apprenticeship opportunities at Public Works, other public agencies, non-profit partners, and private companies

Tree Watering Services

- Water up to 2,400 street trees per week to ensure establishment after planting.
- Plant up to 600 replacement trees.
- Perform watering from a water tank or truck with each tree receiving 25-30 gallons of water per week (20 gallons of water in the Treegator bag and 5-10 gallons on the rootball).
- Replace damaged or missing watering bags and missing tree stakes, cross braces and ties.

Sole Source Justification: San Francisco Administrative Code Chapter 21G.8, permits a department to negotiate a Sole Source Grant Agreement without open and competitive process, bypassing Sections 21G.4, 21G.5, and 21G.6, as long as it follows the Purchaser's rules and regulations.

1. **Approval by Commission or Board:** If the Granting Agency operates under a commission or board, it **must** obtain approval from that commission or board before awarding a sole source grant.
2. **Recommendation Requirement:** The Granting Agency **must** recommend the sole source grant to the commission or board, justifying why the competitive process is not feasible or necessary.
 - a. **Justification from Public Works:** The current grantee, San Francisco Conservation Corps (SFCC), ceased performance of the Grant Plan on January 31, 2025, necessitating an expedited award to prevent service disruption. Public Works is unable to conduct a competitive process currently due to the urgent nature of the grant, which requires immediate action to ensure continuity of essential services, such as tree watering.

Public Works conducted a competitive solicitation process approximately two (2) years ago. A Request for Proposals (RFP) was issued 5/9/23 with a 7/5/23 proposal due date. Public Works received two (2) proposals for the Tree Watering Workforce Development (WFD) RFP with an intent to award one (1) grant. City staff reviewed all proposals and determined that both were responsive and responsible. The responsive and responsible proposals were then evaluated and scored by a panel comprised of subject matter experts from San Francisco Public Works and UCSF. Proposer San Francisco Conservation Corps was the highest ranked proposal for the Tree Watering WFD RFP based on the panelists scores.

SF Clean City Coalition was the only other Proposer in the aforementioned Request for Proposals (RFP) process conducted. Additionally, as the prior grantee of this program, SF Clean City Coalition has demonstrated a proven track record of successfully completing the scope of work. Their institutional knowledge, experience, and established infrastructure uniquely position them to execute the grant objectives efficiently and without interruption.

Given these circumstances, awarding a sole source grant to SF Clean City Coalition is the most feasible and effective course of action to ensure the timely and successful continuation of program services.

3. **Formal Adoption:** The commission or board **must adopt a resolution** approving both the justification for the sole source grant and the actual grant award.

Contract Funding Sources: & Amounts

Source	Amount
Tree Maintenance Fund (TMF)	\$2,506,478.88
Adopt a Tree	\$986,261.40
District 10 COP	\$ 344,802.32
FY23 CIP	\$107,503.00
Prop L	\$986,261.40

Recommended:

DocuSigned by:

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4/28/2025 | 7:51:13 AM PDT

Jon Swae, Program Manager

Date

DocuSigned by:

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4/28/2025 | 8:43:20 AM PDT

Nicholas Crawford, Bureau Manager

Date

DocuSigned by:

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4/28/2025 | 1:48:52 PM PDT

Carla Short, Director

Date

Appendix C: Proposed Budget Template
Tree Planting Workforce Development Programs

Direct Program Personnel Costs						
Personnel Title of Position	# of Staff in the Position	Allowable Pay Range	Mid Rate	FTE % based on 40 hour week	Program Cost	
Tree Specialist Op Mgr	1	45	\$ 45	100%	\$	93,600
Tree Specialist Operators	4	39	\$ 39	100%	\$	324,480
Tree Specialist Operators	2	39	\$ 39	50%	\$	81,120
Employment Training Mgr	1	45	\$ 45	100%	\$	93,600
Job Readiness Coordinator	1	35	\$ 35	100%	\$	72,800
Workforce Participants	5	24	\$ 24	75%	\$	187,200
Director of Operations	1	83	\$ 83	80%	\$	138,112
Executive Director	1	98	\$ 98	40%	\$	81,536
Tree Planting Mgr	1	56	\$ 56	100%	\$	116,480
Tree Plating Participants	3	36	\$ 36	20%	\$	44,928
					\$	-
					\$	-
					\$	-
Subtotal Personnel				765%	\$	1,233,856
% of Personnel Costs						
Fringe Benefits				21%	\$	259,110
Direct Program Personnel					\$	1,492,966
Total						

Non-Personnel Program Costs						
Subcontractors		*allowed only for Program B				
Subcontractor 1						
Subcontractor 2						
Subcontractor 3						
Subcontractor 4						
Professional Development & Training					\$	15,000
Program Materials & Supplies					\$	175,000
Equipment					\$	183,000
Maintenance					\$	25,000
Facilities & Occupancy					\$	111,400
Transportation & Travel					\$	43,000
Insurance					\$	52,000
Human Resources					\$	12,000
Stipends and Participant Incentives						
Non-Personnel Program					\$	616,400
Costs Total						
TOTAL DIRECT COSTS					\$	2,109,366

Indirect Costs			% of Direct Costs	
Administrative and Overhead			15%	\$ 316,405
TOTAL REQUEST				\$ 2,425,771

Appendix C: Proposed Budget Template
Tree Planting Workforce Development Programs

Direct Program Personnel Costs						
Personnel Title of Position	# of Staff in the Position	Allowable Pay Range	Mid Rate	FTE % based on 40 hour week	Program Cost	
Tree Specialist Op Mgr	1	45	\$ 45	100%	\$	93,600
Tree Specialist Operators	6	39	\$ 39	100%	\$	486,720
					\$	-
Employment Training Mgr	1	45	\$ 45	100%	\$	93,600
Job Readiness Coordinator	1	35	\$ 35	100%	\$	72,800
Workforce Participants	5	24	\$ 24	75%	\$	187,200
Director of Operations	1	86	\$ 86	70%	\$	125,216
Executive Director	1	101	\$ 101	35%	\$	73,528
Tree Planting Mgr	1	56	\$ 56	100%	\$	116,480
Tree Plating Participants	3	36	\$ 36	20%	\$	44,928
					\$	-
					\$	-
					\$	-
Subtotal Personnel				700%	\$	1,294,072
% of Personnel Costs						
Fringe Benefits				21%	\$	271,755
Direct Program Personnel Total					\$	1,565,827

Non-Personnel Program Costs						
Subcontractors		*allowed only for Program B				
Subcontractor 1						
Subcontractor 2						
Subcontractor 3						
Subcontractor 4						
Professional Development & Training					\$	15,000
Program Materials & Supplies					\$	159,500
Equipment					\$	185,000
Maintenance					\$	30,000
Facilities & Occupancy					\$	111,400
Transportation & Travel					\$	48,000
Insurance					\$	52,000
Human Resources					\$	12,000
Stipends and Participant Incentives						
Non-Personnel Program Costs Total					\$	612,900
TOTAL DIRECT COSTS					\$	2,178,727

Indirect Costs			% of Direct Costs	
Administrative and Overhead			15%	\$ 326,809
TOTAL REQUEST				\$ 2,505,536



City and County of San Francisco
San Francisco Public Works
Contract Administration Division



BUREAU OF URBAN FORESTRY WORKFORCE DEVELOPMENT RFP

Program A: Tree Watering Program

Sourcing Event ID No.: 0000006777

Date Proposals Received: July 5, 2023

Panelist Review – Score Summary and Ranking

	Panelist 1	Panelist 2	Panelist 3	AVG TOTAL
SF Conservation Corps				
Project Approach	28	42	39	
Organizational Capacity	27	30	22	
Fiscal Capacity	22	25	24	
Total	77	97	85	86.33
SFCCC				
Project Approach	33	41	38	
Organizational Capacity	25	30	24	
Fiscal Capacity	20	25	22	
Total	78	96	84	86.00



SAN FRANCISCO PLANNING DEPARTMENT

Certificate of Determination Exemption from Environmental Review

Case No.: 2013.1517E
Project Title: 2014 Urban Forest Plan
Project Sponsor: Jon Swae; San Francisco Planning Department
(415) 575-9069
Staff Contact: Kei Zushi (415) 575-9036
kei.zushi@sfgov.org

1650 Mission St.
Suite 400
San Francisco,
CA 94103-2479

Reception:
415.558.6378

Fax:
415.558.6409

Planning
Information:
415.558.6377

PROJECT DESCRIPTION:

The proposed project is to adopt the 2014 Urban Forest Plan Phase I ("Plan"). The Plan identifies policies and strategies to proactively manage and protect street trees in San Francisco. The Plan would help address issues related to street trees, including funding for street tree maintenance and planting of new street trees to address their uneven distribution within San Francisco. Phases 2 and 3 of the Urban Forest Plan have yet to be developed, but would address the management of trees in parks and open spaces (Phase 2) and trees on private property and greening of buildings (Phase 3). This exemption from environmental review covers Phase I of the Urban Forest Plan.

(Continued on Second Page.)

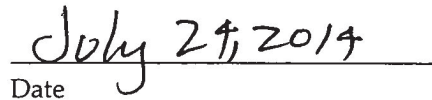
EXEMPT STATUS:

Categorical Exemption, Classes 4 and 8 (State CEQA Guidelines Sections 15304(b) and 15308).

DETERMINATION:

I do hereby certify that the above determination has been made pursuant to State and local requirements.


Sarah B. Jones
Environmental Review Officer


Date

cc: Jon Swae, Project Sponsor

Distribution List
Virna Byrd, M.D.F.

PROJECT DESCRIPTION (continued):**Setting**

Surrounded by the Pacific Ocean and San Francisco Bay and located at the tip of an environmentally diverse peninsula, San Francisco is a phenomenal mosaic of topography, weather, geology, and ecology. San Francisco's streets and parks resemble a global arboretum with over 200 species of trees from places including Australia, Asia, and Africa. There are currently approximately 700,000 trees¹ in San Francisco, which renders 13.7 percent of San Francisco covered by tree canopy.² This urban forest³ is almost entirely the result of human-initiated planting activities over the last 150 years.

San Francisco has one of the smallest tree canopies of major U.S. cities. The average U.S. metropolitan canopy cover is 33 percent.⁴ San Francisco's tree canopy is shrinking, and ongoing funding and operational challenges have limited the reach of municipal tree planting and maintenance programs. As many as 100,000 potential street tree planting spaces remain empty. In addition, street trees in San Francisco are not evenly distributed, and some traditionally underrepresented neighborhoods have less greenery.

Plan Goals & Key Recommendations

The Plan includes the following five goals for the urban forest:

1. Grow the urban forest through new planting to maximize the social, economic and environmental benefits of trees and urban greening;
2. Protect the urban forest from threats and loss by preserving the City's existing trees;
3. Manage the urban forest through coordinated planning, design and maintenance to ensure its long-term health and sustainability;
4. Fund the urban forest program by establishing a long-term funding strategy for the City's trees; and
5. Engage residents, public agencies, community groups, and the private sector in caring for the urban forest and fostering their deeper connection to nature.

The Plan identifies four key recommendations that synthesize many of the individual policies and strategies contained in the Plan, which include:

¹ This is the total number of existing trees in San Francisco including trees within the public streets, parks, and private properties.

² A city's tree canopy is measured by the amount of land covered by trees when viewed from above.

³ The term "urban forest" describes the collection of trees and other vegetation found along San Francisco's street and within the built environment. See page 4 of the *draft 2014 Urban Forest Plan* for more information. Available online at: http://www.sf-planning.org/ftp/files/plans-and-programs/planning-for-the-city/urban-forest-plan/Urban_Forest_Plan_Final-051414.pdf. Accessed July 11, 2014.

⁴ City and County of San Francisco. *Draft 2014 Urban Forest Plan, Final Draft*, Spring 2014.

1. *Maximize the benefits of urban trees.* San Francisco's trees provide a wide range of important social, economic, and environmental benefits (estimated at \$9.4 million annually).^{5,6} Some of these benefits include air and water filtration, carbon storage, and habitat creation. The Plan recommends maximizing the benefits of urban trees by identifying and planting high-performing species that would help maximize the social, economic, and environmental benefits of trees.⁷ In addition, the Plan recommends signage and increased communication of these benefits so that they are more visible to policy makers and the public.

2. *Grow the street tree population by 50 percent.* The Plan recommends the planting of 50,000 new street trees on San Francisco's streets over the next 20 years. This would expand San Francisco's street tree population by half from 105,000 street trees (2014) to 155,000 street trees (2034). These new trees would help stem the decline of the urban forest, address San Francisco's limited tree canopy, and bring the trees' benefits to more neighborhoods in San Francisco. In addition, the new trees would be planted in underrepresented locations to create a more equitable distribution of tree canopy and help reduce greening inequities throughout San Francisco.

The typical root ball size of new trees to be planted under the Plan is approximately 24 inches by 24 inches.⁸ New street trees would be planted in existing or new tree planters, generally three feet by three feet in size, within existing sidewalks along public streets. Installation of a new street tree would require excavation that would reach a depth of approximately 24 to 48 inches below the adjacent sidewalk level.⁹ Unhealthy or hazardous street trees would continue to be removed under the Plan. Best Management Practices (BMPs) for erosion control would be implemented as deemed necessary during tree planting, such as installation of straw wattles and chips.¹⁰

3. *Establish and fund a citywide street tree maintenance program.* The Plan proposes halting the practice of transferring the maintenance responsibility for street trees to private property owners. The Plan recommends centralizing maintenance responsibility for 100 percent of San Francisco's street trees under the Department of Public Works (DPW) through a municipal street tree program. Under such a program, homeowners would be relieved from the responsibility of maintaining trees fronting their property and undertaking tree-related sidewalk repairs. Creation of a citywide street tree maintenance program would require the establishment of a dedicated long-term funding source to finance the program. A variety of funding options for consideration by decision-makers have been identified including an assessment district, parcel tax, and general obligation bonds. The Plan

⁵ U.S. Department of Agriculture, Forest Service. *Assessing Urban Forest Effects and Values: San Francisco's Urban Forest*, 2007. Available online at: http://www.nrs.fs.fed.us/pubs/rb/rb_nrs008.pdf. Accessed July 11, 2014.

⁶ Jon Swae, San Francisco Planning Department. *Email to Kei Zushi, San Francisco Planning Department, Urban Forest Plan*, July 11, 2014. This email is available for review as part of Case File No. 2013.1517E at 1650 Mission Street, Suite 400, San Francisco, CA.

⁷ *Ibid.*

⁸ Carla Short, SFDPW. *Email to Kei Zushi, San Francisco Planning Department, Tree Size: 2014 Urban Forest Plan*, July 15, 2014. This document is available for review as part of Case File No. 2013.1517E at 1650 Mission Street, Suite 400, San Francisco, CA.

⁹ Carla Short, SFDPW. *Email to Kei Zushi, San Francisco Planning Department, Street Tree Planting/Irrigation*, July 9, 2014. This document is available for review as part of Case File No. 2013.1517E at 1650 Mission Street, Suite 400, San Francisco, CA.

¹⁰ Carla Short, SFDPW. *Email to Kei Zushi, San Francisco Planning Department, Erosion Control BMPs: Street Tree Planting/Irrigation*, July 7, 2014. This document is available for review as part of Case File No. 2013.1517E at 1650 Mission Street, Suite 400, San Francisco, CA.

recommends further evaluation of these tools to determine the feasibility of each and the potential to achieve the Plan's goals.

4. Manage trees throughout their entire life-cycle. The Plan recommends managing street trees through their entire life-cycle. The components of a street tree life-cycle management program include the development of a street tree nursery, a removal and succession strategy, and a wood re-use program to create second-life products from dead or removed street trees.

Please see the Plan for a detailed list of the specific strategies identified in the Plan.

Project Approval:

The Approval Action for the project is the adoption of the proposed Plan by the San Francisco Board of Supervisors. The Approval Action date establishes the start of the 30-day appeal period for this CEQA exemption determination pursuant to Section 31.04(h) of the San Francisco Administrative Code.

REMARKS:

Biological Resources

The goals and strategies in the Plan would not directly result in the construction of any facilities, but would serve to guide how and where new street trees should be planted and help fund the continued maintenance of street trees and removal of unhealthy or hazardous trees over the next 20 years in San Francisco. New street trees would be planted within existing sidewalks along public streets. Installation of a new street tree would require excavation that would reach a depth of approximately 24 to 48 inches below the adjacent sidewalk level.¹¹

Strategy 1.2.7 in the Plan calls for "Us[ing] the urban forest to support local wildlife and provide habitat." The Plan would not conflict with existing or foreseeable plans or programs that pertain to the protection of special-status species¹² or other natural resources and implementation of the Plan would not have a substantial adverse effect on any special-status species or sensitive natural resources.

Under the Plan, DPW would continue to maintain street trees and remove unhealthy or hazardous trees. In maintaining the urban forest, DPW would continue to comply with the Migratory Bird Treaty Act (MBTA), which generally makes it unlawful to pursue, hunt, take, capture, or kill any migratory bird or its nest or egg, in undertaking these activities. Therefore, implementation of the Plan would not result in significant impacts to migratory birds.

¹¹ Carla Short, SFPDW. Email to Kei Zushi, San Francisco Planning Department, *Street Tree Planting/Irrigation*, July 9, 2014. This document is available for review as part of Case File No. 2013.1517E at 1650 Mission Street, Suite 400, San Francisco, CA.

¹² For the purposes of this Categorical Exemption, the term "special-status species" includes species that are: 1) legally protected by the Federal Endangered Species Act (FESA), California ESA, or Migratory Bird Treaty Act (MBTA); or 2) locally significant sensitive species, including species on the National Audubon Society's Watch List or those under threat of local extirpation, as determined by the Yerba Buena chapter of the California Native Plant Society (CNPS) or the Golden Gate chapter of the National Audubon Society.

In light of the above, implementation of the Plan would not result in significant impacts to biological resources.

Utilities

Strategy 1.1.5 in the Plan states that, "Drought-tolerant tree species should continue to be prioritized." A newly planted street tree normally requires 15 gallons of water per week for irrigation purposes and only during the first three to five years of planting.¹³ Therefore, a total of approximately 2,340 to 3,900 gallons of irrigation water would be required for each newly planted tree.¹⁴ The Plan calls for a total of 50,000 new street trees over the next 20 years. Therefore, the new street trees to be planted under the Plan over the next 20 years would collectively require approximately 117 to 195 million gallons of irrigation water in total. This incremental increase in the demand for irrigation would be accommodated within the anticipated water supply projections for San Francisco, given that citywide water use in the year 2010 was approximately 85 million gallons per day. Therefore, the Plan would not result in significant impacts with respect to the availability of water supply.

Strategy 1.2.3 in the Plan calls for DPW to, "Help manage stormwater through increased use of trees and landscaping." Street trees help reduce the amount and speed of surface stormwater runoff entering collection and treatment facilities during large storm events by capturing rainwater on leaf surfaces and uptake via root systems. The amount of rainwater that a typical street tree can intercept ranges from 460 to 4,000 gallons per year.¹⁵ This in turn helps decrease overall combined sewer discharges into the Bay and ocean. Therefore, the Plan would not result in significant impacts with respect to stormwater facilities.

In light of the above, the Plan would not result in significant impacts with respect to utilities.

Cumulative Impacts

Cumulative projects include past, current, and reasonably foreseeable future projects. While Phases 2 and 3 of the Urban Forest Plan have yet to be developed, Phase 2 would address the management of trees in parks and open spaces and Phase 3 would address trees on private property and greening of buildings. Based on the preliminary scope and nature of Phases 2 and 3 of the Urban Forest Plan, it is not anticipated that Phases 2 or 3, in combination with the proposed project, would result in any significant environmental impacts. As of July 2014, there are no known past, current, or reasonably foreseeable future projects that would, in combination with the proposed Phase I of the Urban Forest Plan, result in any significant environmental impacts. Thus, the proposed Phase I of the Urban Forest Plan, in

¹³ Carla Short, SFDPW. Email to Kei Zushi, San Francisco Planning Department, *Street Tree Planting/Irrigation*, July 7, 2014. This document is available for review as part of Case File No. 2013.1517E at 1650 Mission Street, Suite 400, San Francisco, CA.

¹⁴ $15 \text{ (gallons of irrigation water per week per new tree)} \times 52 \text{ (weeks per year)} \times 3 \text{ (years)} = 2,340 \text{ (gallons of irrigation water required during the first three years of planting per new tree)}$. $15 \text{ (gallons of irrigation water per week per tree)} \times 52 \text{ (weeks per year)} \times 5 \text{ (years)} = 3,900 \text{ (gallons of irrigation water required during the first five years of planting per new tree)}$.

¹⁵ City and County of San Francisco. *Draft 2014 Urban Forest Plan, Final Draft*, Spring 2014.

combination with other past, current, or reasonably foreseeable future projects, would not result in any significant effects on the environment.

Exempt Status

State CEQA Guidelines Section 15304(b), or Class 4, provides an exemption from environmental review for minor public or private alterations to the condition of land, water, and/or vegetation which do not involve the removal of healthy, mature, scenic trees except for forestry and agricultural purposes, including new gardening or landscaping to replace existing conventional landscaping with water efficient or fire resistant landscaping. The planting of street trees resulting from the Plan would be a minor alteration to public land that does not include the removal of any scenic trees or healthy, mature trees. Only unhealthy or hazardous street trees would be removed. Furthermore, drought-tolerant tree species would be given priority in selecting street trees under the Plan. Therefore, the project qualifies for exemption from further CEQA review under Class 4.

State CEQA Guidelines Section 15308, or Class 8, provides an exemption from environmental review for actions by regulatory agencies to assure the maintenance, restoration, enhancement, or protection of the environment. The Plan would provide general goals and strategies to maintain, enhance, and protect the environment, i.e., San Francisco's street trees. Thus, the project qualifies for exemption from further CEQA review under Class 8.

Conclusion

CEQA Guidelines Section 15300.2 states that a categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances. There are no unusual circumstances surrounding the current proposal that would suggest a reasonable possibility of a significant effect. The proposed project would have no significant environmental effects. The project would be exempt under the above-cited classifications. For the above reasons, the proposed project is appropriately exempt from environmental review.