FairTrees.org

Advocating for Environmental Equity in San Francisco

Dear OEHHA Staff and CalEPA Leadership,

I am writing on behalf of FairTrees.org and as a resident of San Francisco Census Tract 178.03 to submit public comment on Draft CalEnviroScreen 5.0.

I strongly support the addition of the Small Air Toxic Sites and Diabetes Prevalence indicators in this draft. These are excellent updates that will help the tool better reflect reality.

However, I am writing to **oppose** the decision to delay the Tree Canopy indicator to Version 6.0. Trees are the primary form of green infrastructure distributed by cities. They are the first line of defense against heat and pollution. To release an 'Environmental Health' tool that measures diabetes and air toxics but ignores the presence or absence of nature itself is a fundamental failure. A screening tool cannot accurately reflect environmental burden if it fails to account for the shadeless concrete that defines the daily experience of burdened residents.

Our arguments:

1) The data is available now. The primary argument against including canopy data has been a lack of statewide consistency. This is no longer the case. The USDA Forest Service and CAL FIRE have released the California Urban Tree Canopy dataset. It uses high-resolution imagery from 2022 to provide a standardized baseline for all Census-defined urban areas, covering the vast majority of the state's population. The dataset was released in April 2025 and is available for immediate download. There is no technical reason to wait another four or five years to integrate this.

2) The lack of data is creating a loophole. Because CalEnviroScreen does not account for the lack of trees, local agencies are using that silence to bypass Disadvantaged Communities.

We are seeing this happen with local funding too. Prop L was approved by voters to fund tree planting in low-canopy districts. Yet public records show that my district received zero percent of the recent $1 million allocation. That is 408 trees funded by a sales tax we pay into, diverted to other neighborhoods. The Public Works department justified this exclusion by claiming we were "covered" by the federal grant mentioned above, the very same grant they also excluded us from.

This circular logic works because the city can point to CalEnviroScreen and claim that the state does not officially recognize canopy deficit as a burden. If you included a canopy indicator, it would end this shell game and force local governments to align their spending with state equity goals.

3) This has triggered legal scrutiny. The confusion caused by this data gap has escalated to the state level. In December 2025, Assemblymember Matt Haney formally requested that the Attorney General's Bureau of Environmental Justice investigate San Francisco for potentially violating SB 1000. Additionally, Supervisor Matt Dorsey has launched a local inquiry into why funds are not reaching the neighborhoods that need them most.

These inquiries highlight a simple fact. We need a trusted state baseline for tree canopy equity that is integrated into existing approved tools, and not standalone and separate. CalEnviroScreen is the **only** tool capable of providing that.

4) The tool ignores fundamental green infrastructure. Trees are not just an aesthetic feature. They are critical infrastructure. In the built environment, tree canopy is the only distributed system capable of mitigating the heat and air pollution that CalEnviroScreen already tracks.

The lack of trees is historically correlated with race and wealth, serving as a physical marker of inequality. By including indicators for "Extreme Heat" and "Diabetes" but excluding "Canopy Deficit," the tool is measuring the symptoms while ignoring the cure. It is illogical to measure a community's vulnerability to heat without measuring the infrastructure that protects them from it.

In my census tract, the lack of canopy (a critically low 1.8%) is a force multiplier for the pollution burdens you are already tracking. Excluding this data renders the cumulative impact score incomplete.

We are asking you to move the Vegetative Cover indicator from the "future scoping" list to the final Version 5.0 release. The data exists, the medical necessity is clear, and the consequences of leaving it out are already visible in our community.

Sincerely,

Shaun Aukland
Founder, FairTrees.org

Attachments:

- Request for Inquiry into San Francisco's Compliance with SB 1000 – Assemblymember Matt Haney (Dec 16, 2025)
- Letter of Inquiry: Tree Canopy Equity – Supervisor Matt Dorsey (Jan 27, 2026)
- Urgent Need to Address Disparity – University of California Center for Climate, Health, and Equity
- Concrete Over Canopy – FairTrees.org Policy Brief

STATE CAPITOL
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Assembly
California Legislature

MATT HANEY
ASSEMBLYMEMBER, SEVENTEENTH DISTRICT

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

December 16, 2025

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

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

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

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Thank you for your attention to this matter.

Sincerely,

Assemblymember Matt Haney
Assemblymember, 17th District

City and County
of San Francisco

Board of Supervisors
Member, District 6

MATT DORSEY
麥德誠

January 27, 2026

Ms. Angela Cavillo, Clerk of the Board of Supervisors
CITY AND COUNTY OF SAN FRANCISCO
City Hall, Room 244
1 Dr. Carlton B. Goodlett Place
San Francisco, Calif. 94102-4689

Emailed to: Angela.Cavillo@sfgov.org

Letter of Inquiry: Tree Canopy Equity and Resource Allocation in District 6

Dear Madam Clerk,

I submit this Letter of Inquiry (LOI) in accordance with the provisions of San Francisco City Charter § 16.114 governing the Board of Supervisors' power of inquiry and review, to request a response from the Department of Public Works.

I seek clarity regarding the City's implementation of its tree planting, replacement, and maintenance policies, particularly as they relate to South of Market and other neighborhoods in District 6 that have repeatedly been identified as priority geographies for urban forestry investment but continue to experience the lowest levels of tree canopy coverage in San Francisco.

Background

South of Market (SoMa) has long been recognized as an Environmental Justice Community and as one of San Francisco's most heat burdened, park poor, and environmentally overburdened neighborhoods. Multiple City adopted plans and voter approved funding measures identify SoMa as a priority area for tree planting to advance climate resilience, public health, and neighborhood livability.

Despite these stated priorities, a significant body of recent, constituent led research has documented persistent and widening disparities in tree canopy distribution and planting outcomes in SoMa and across District 6. This work is rigorous, data driven, and rooted in a clear commitment to partnership with the City. Importantly, it provides an opportunity for the City to review how its policies, funding frameworks, and operational practices support its stated equity goals, General Plan commitments, and legal obligations under state and local law.

Their research highlights that SoMa continues to have the lowest tree canopy coverage in the City, even as new funding sources intended to advance environmental justice and climate adaptation have been deployed elsewhere. It also documents the cumulative effects of administrative policies that result in empty tree wells, deferred replacements, and the loss of existing canopy in precisely the neighborhoods most in need of investment.

My intent in submitting this Letter of Inquiry is to better understand how decisions are being made, how equity frameworks are operationalized in practice, and how the City can course correct where outcomes do not match intent. I believe Public Works shares the goal of delivering environmental benefits fairly and transparently, and that clarity on these questions will help support that shared objective.

Requests for Information

To that end, I respectfully request written responses to the following questions.

1. **Environmental Justice Framework and General Plan Policies:** California Senate Bill (SB) 1000 requires that cities and counties adopt policies in their General Plan to address environmental justice[1]. In response, the Planning Commission adopted the Environmental Justice Framework in 2023 to establish a clear set of visions and priorities to advance health in communities of color and low-income communities. This was later codified by the Board of Supervisors via Ordinance No. 084-23[2].
    - **a.** How does the Department operationalize the San Francisco Environmental Justice Framework in tree planting and maintenance decisions, and does it use the City's Environmental Justice Burden Scores to guide or weight resource allocation?
    - **b.** Priority 1.3 of the Environmental Justice Framework calls for developing neighborhood specific targets for tree canopy cover. This echoes a recommendation the Budget and Legislative Analyst made in their 2021 Street Resurfacing Program and StreetTreeSF Program Performance Audit[3]. Do such targets exist for neighborhoods in District 6, including South of Market, South Beach, Mission Bay, and Treasure Island? If so, what are those targets? If not, what is the timeline for their creation?

2. **Funding Equity and Allocation**
    - **a.** In November 2022, San Francisco voters approved Proposition L, which replaced the prior half-cent transportation sales tax under Proposition K. Proposition L funds include support for the planting and establishment of street trees in the public right of way[4]. In November 2023, the San Francisco County Transportation Authority (SFCTA) announced a $1 million allocation to plant and establish 408 street trees, with weekly watering for three years during the establishment period and lifetime maintenance through Public Works' StreetTreeSF program. Program materials indicate that this investment was intended to prioritize Districts 5, 6, and 10 based on tree census data

[1] https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201520160SB1000

[2] https://sfgov.legistar.com/View.ashx?M=F&ID=12001161&GUID=CAFD5813-D06C-44FA-9947-D21B10104D18

[3] https://sfbos.org/sites/default/files/061421_PA_of_DPW_Street_Resurfacing_Prog_%26_StreetTreeSF%20Prog.pdf

[4] https://www.sfcta.org/sites/default/files/2023-04/2022_Expenditure_Plan_Clean.pdf

identifying areas with the lowest canopy coverage.[5]. Planning documents subsequently show that, "SFPW [San Francisco Public Works] preliminarily expect[ed] to focus on planting in District 10 based on tree census data, low canopy coverage, and geographic equity". Can the Department confirm the final locations where these 408 trees were planted and describe the specific criteria and decision-making process that resulted in the final planting strategy?

b. In December of last year, the San Francisco County Transportation Authority announced a $1.1 million allocation of transportation sales tax funds to support the San Francisco Public Works Tree Planting and Establishment Project, which will plant approximately 407 additional street trees. Planting locations were identified and prioritized based on tree census data showing low canopy coverage and heightened exposure to extreme heat and air pollution, as well as equity indicators including Equity Priority Communities and Environmental Justice Communities.[6] What specific framework, criteria, or scoring methodology did the Department use to translate these data inputs into district level planting decisions, and how did that analysis result in the selection of the final planting locations? Please confirm the final planting locations.

c. In September of 2023, San Francisco was awarded $12 million in federal grant funding to plant and maintain trees[7]. At the time of the announcement, then Mayor London Breed shared that this funding would "strengthen our urban canopy", particularly in neighborhoods like the South of Market, among others. To date, how has the South of Market neighborhood benefited from this funding, including the number and location of trees planted or maintained? Looking ahead, what portion of this funding is planned for investment in SoMa, and what is the anticipated timeline and scope of those future benefits?

d. Last year, San Francisco Clean City Coalition was awarded a sole source grant contract in an amount not to exceed $4,931,307.00 to, in part, plant up to 600

[5] https://www.sfcta.org/blogs/prop-l-transportation-sales-tax-investments-bart-fare-gates-tree-planting-vision-zero-and

[6] https://www.sfcta.org/blogs/transportation-sales-tax-funds-cable-cars-trees

[7] https://www.sf.gov/news--san-francisco-awarded-12-million-federal-grant-plant-thousands-new-street-trees-fight-climate

replacement trees and water 2,400 street trees[8]. How were neighborhoods prioritized for replacement planting and watering under this contract?

3. **Discretionary Guidelines**
   - **a.** In a document obtained by my constituents via Public Records Request #25-8453, a document titled "Deferral Criteria from FUF October 2023" appears to describe "criteria for evaluating a resident's tree planting concern and escalating it above the public good, resulting in Friends of the Urban Forest choosing to not plant a basin."[9] Mentioned in the document is an allowance for deferrals when "a shockout or empty basin is in close proximity to a temporary shelter for unhoused people." Is this deferral criterion an active policy or practice for the Department and/or Friends of the Urban Forest today? What is the origin and rationale for this policy? Do our nonprofit partners or grantees rely on or apply it when making tree planting decisions? Please also clarify whether this criterion has been formally adopted, how it is communicated to residents, and how its use is tracked and reviewed to ensure consistency with the City's equity and environmental justice goals.
   - **b.** Director's Order 187246, adopted in 2018, outlines how the planting, maintenance, or removal of trees and landscape material on public sidewalk areas are regulated. Section V outlines the requirements for new tree basin construction and dimension and specifies that "No street tree planting will be allowed in sidewalks with a width less than 7'-6". Exceptions may be granted on a case-by-case basis, as approved by Public Works"[10]. What are the specific criteria for granting an exception under Section V(B)(ii) and, what is the process for residents to apply for an exception? How many exceptions have been granted since the Order was signed in 2018?
   - **c.** My constituents have identified more than 130 empty tree wells on streets with a width less than 7'-6". For locations where an exception is not requested or approved per Director's Order 187246, what is Public Works' standard

[8] https://sfpublicworks.org/sites/default/files/Commissions/May%208%202025/Item_4d%20PWC%20-%20Tree%20Watering%20-%20StaffReport%20Resolution%20Attachments%205-8-25%20v55.pdf

[9] https://sanfrancisco.nextrequest.com/documents/55541864

[10] https://sfpublicworks.org/sites/default/files/187246_Public%20Works%20Director%27s%20Order%20on%20Tree%20Planting_0.pdf

approach to these empty planting sites? Is the default outcome to fill the basin with concrete, or are there alternative treatments or interim solutions available to preserve future planting opportunities?

d. Was an impact analysis conducted prior to the adoption of Director's Order 187246 to assess how many existing street trees or planting sites would become ineligible for replacement? If so, what were the findings of that analysis? If known, how many planting sites in District 6 were identified as ineligible for replanting following enactment of the Order?

4. Empty Tree Well Backlog

a. A document obtained by my constituents through Public Records Request No. 25-8280 indicates that Public Works was aware of more than 500 existing empty tree wells in the South of Market neighborhood[11]. Is this figure still accurate? If not, please provide the current number. What specific plan and timeline does the Department have to address and fill these empty tree wells?

b. My constituents have informed me that more than 900 empty tree well requests were closed by the Department on December 4 and 5, 2025, with the closure reason cited as "Planned Maintenance." Please elaborate on what this means and provide the specific capital project codes and funding sources assigned to these locations. If no funded project exists for these sites, please explain the rationale for removing these public reports from the active request queue.

c. Please provide the number of 311 requests for tree planting by district over the last 12 months. How many of these requests were approved, and what were the primary barriers to approval?

5. Deferred Tree Replacements and Legal Compliance

a. In January 2022, the Board of Supervisors adopted Ordinance 001 22, amending Public Works Code Article 16 Section 806(a)(6)(c) to require tree replacements within 120 days or inclusion on a Delayed Tree Replacement Report. Please provide the most recent Delayed Tree Replacement Report. If such a report does not exist, please explain.

b. How does the Department track the replacement of dead or removed trees?

[11] https://sanfrancisco.nextrequest.com/documents/55322029

6. **Public Works Code Article 16: Enforcement and Compliance**
    - **a.** Public Works Code Article 16 establishes permitting, replacement, and enforcement requirements for the planting and removal of street trees by parties other than the Department, including obligations tied to development projects. With that framework in mind, after completion of a qualifying development project, what processes does Public Works use to verify compliance with required street tree planting permits, including confirmation that permitted trees have been planted within the required timeframe and in accordance with approved species and locations?
    - **b.** If required trees cannot be planted as permitted due to infrastructure conflicts, site constraints, or other conditions, what is the Department's protocol for modifying permit requirements, approving alternative planting locations, or assessing in lieu fees, and what written findings are required to support such determinations?
    - **c.** Once trees are planted pursuant to a development related permit, how does Public Works ensure that those trees are maintained through establishment, including monitoring survival, enforcing replacement obligations if trees are stolen or fatally damaged, and determining when maintenance responsibility transfers to the Department?
    - **d.** Public Works Code Article 16 Section 808 prohibits the injury or destruction of street trees and requires approved tree protection measures during construction activities. With respect to these requirements, how does the Department monitor and enforce compliance with tree protection requirements throughout the lifecycle of a construction project, including during permitting, active construction, and project close-out?
    - **e.** When a violation of Section 808 occurs, how does the Department determine whether the injury or damage resulted from intentional, malicious, or grossly negligent conduct, and what penalties, replacement obligations, or corrective actions are assessed as a result?
    - **f.** How does the Department track violations, assess replacement costs, fines, and penalties associated with tree damage during construction, and does the Department maintain an accounting of these amounts by project or district? How are those funds used?

I appreciate the Department's continued engagement on these issues and look forward to your responses. My goal is to ensure that the City's policies, funding decisions, and operational practices are delivering on our shared commitments to environmental justice, climate resilience, and equitable public investment for the residents of South of Market and all of District 6.

Please do not hesitate to reach out to my office with any questions as you prepare your response.

Should you have questions or require more clarity, you may contact me or my Chief of Staff, Dominica Donovan, Dominica.Donovan@sfgov.org.

Sincerely,

MATT DORSEY

Cc: Carla Short, Director
San Francisco Public Works
Carla.Short@sfdpw.org

UNIVERSITY OF CALIFORNIA Center for Climate, Health and Equity

UNIVERSITY OF CALIFORNIA, SAN FRANCISCO

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SANTA BARBARA • SANTA CRUZ

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
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David Moore, David.Moore@sfdpw.org
Shaun Aukland, shaun.aukland@gmail.com
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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.

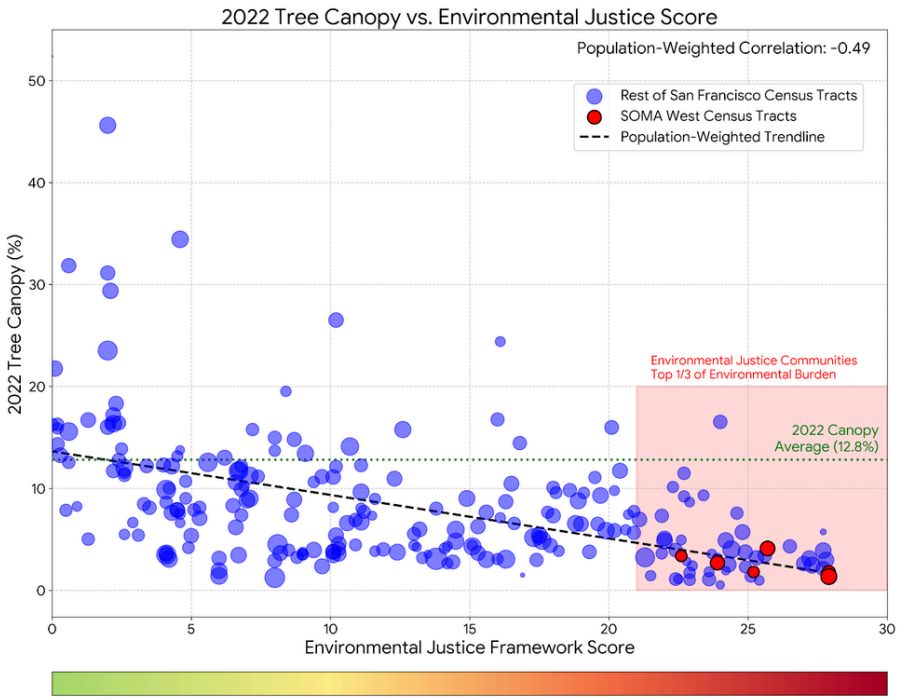
This document proves the case for repealing the damaging order, and more importantly, provides a clear path forward. This problem is solvable and worth solving, but it requires a coordinated effort. We lay out a Phased Path to Accountability and Action (Section 4) and request specific actions from the 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 requirement[2]. The framework is grounded in an acknowledgment of "environmental racism,"[3] and uses the percentage of persons of color as a key indicator of vulnerability[4]. 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 Score[5]. 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 feet[7], 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 danger[21]—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-wide[5]. 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 far[22].

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]

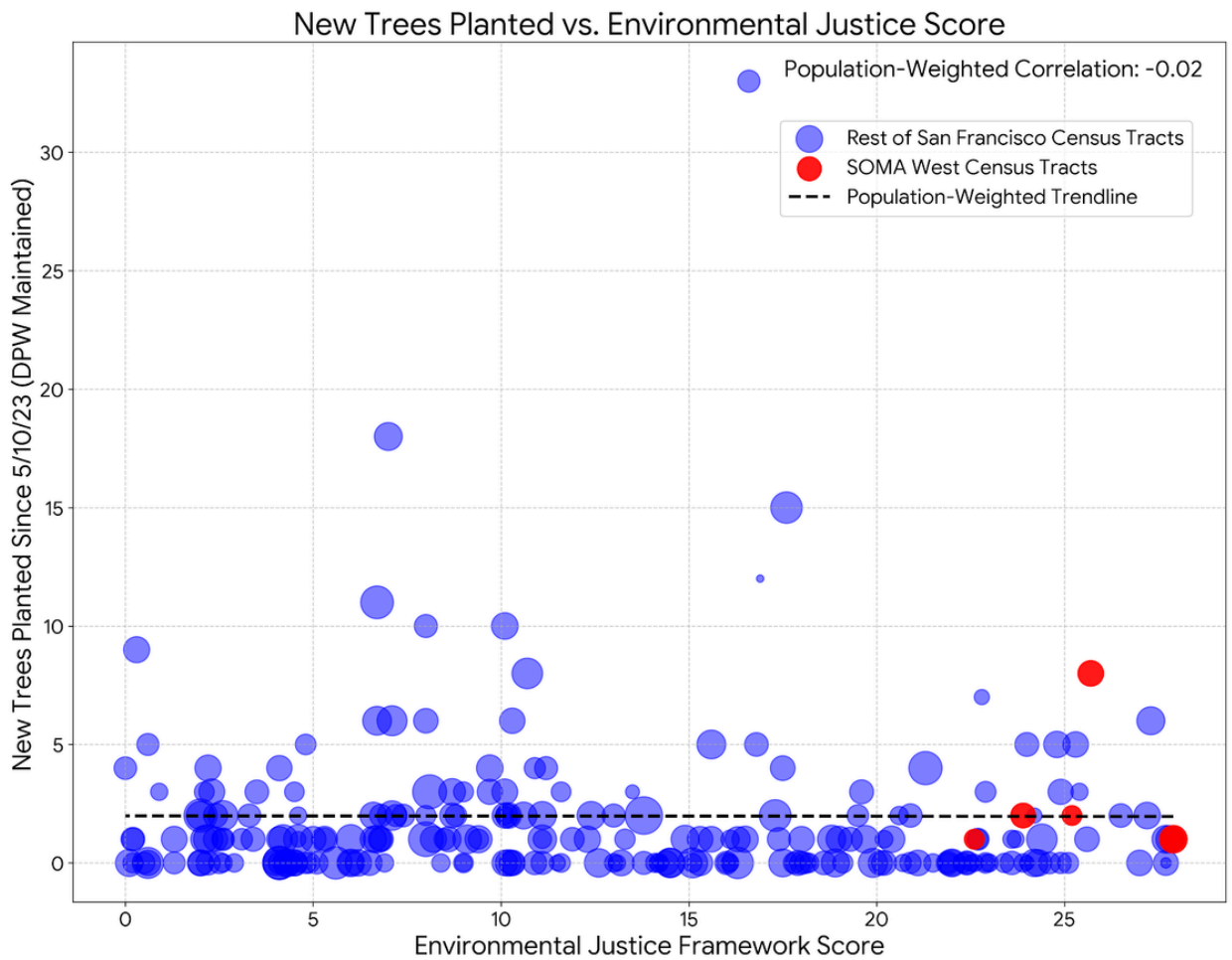
A Climate Policy in Reverse, Falling Behind Peers: The policy creates an irreconcilable conflict with the city's climate goals. In 2014, San Francisco's Urban Forest Plan set an ambitious goal to add 50,000 trees to our urban canopy[10]. A decade later, the city has not only failed to make progress, it has gone backward, with 308 fewer trees today than in 2017[11]. This leaves the city nearly 10,000 trees behind schedule to meet its 2040 climate goals[11]. 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 discretionary[20] 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 planted[5]. This confirms the city has not prioritized planting in EJCs as required by law[13], 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 Tenderloin[14].

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.

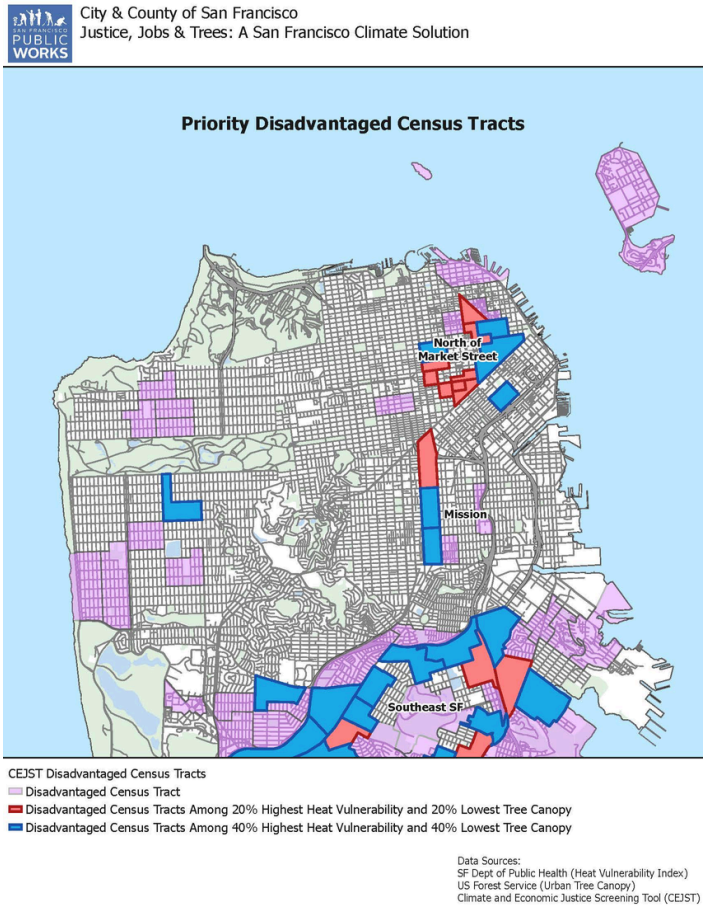
Instead, Public Works created its own non-compliant framework, combining two tools that are demonstrably outdated and inferior to the city's own EJF for this purpose:

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.**

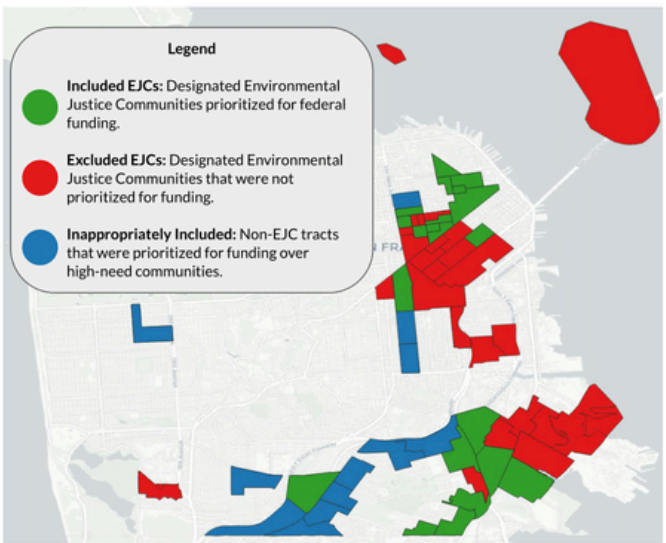
This discretionary[23] decision to use a flawed and outdated methodology directly contradicts the department's legal obligation to adhere to the General Plan. The result is a clear case of administrative malpractice. The city's implementation plan for this grant, the "3,500 Trees Project," excludes **24 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.

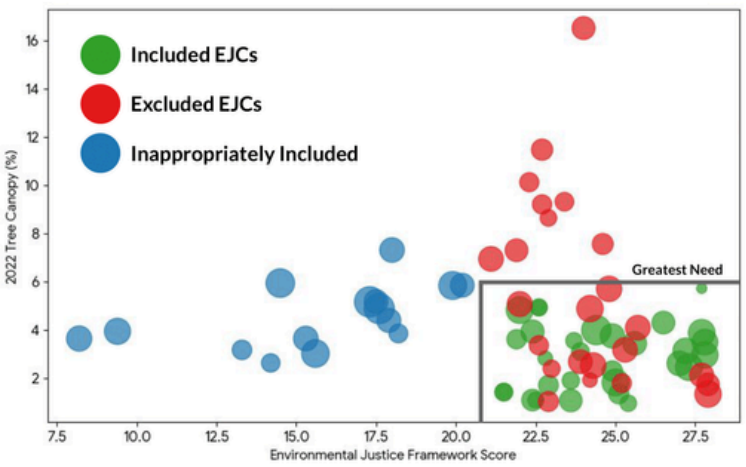
The consequences of this misdirection are borne directly by residents; with no publicly funded support, those in our neighborhood are blocked by prohibitive costs, recently pooling their money at $800 per tree or not planting at all.

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	Ceanothus 'Ray Hartman'	10-20 ft	10-15 ft	CA native. Rounded canopy can interfere with pedestrian path of travel when young
Weeping bottlebrush	Callistemon viminalis	20 ft	15 ft	Make sure not to source popular dwarf varieties. Weeping form often requires more training
Pink dawn chitalpa	x Chitalpa tashkentensis 'Pink Dawn'	25 ft	20 ft	Prefers full sun
Desert willow	Chilopsis linearis	25 ft	10-20 ft	Prefers full sun, good drainage
Washington hawthorn	Crataegus phaenopyrum	25 ft	20 ft	Has thorns, rounded canopy
Persian ironwood (columnar)	Parrotia persica 'Persian Spire'	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	Lophostemon confertus	40-50 ft	20-30 ft	Staple of downtown SF, possibly overplanted. Can get large
Sweetshade	Hymenosporum flavum	30-40 ft	15-20 ft	Wind tolerance can be an issue; irregular branching aesthetic
Catalina ironwood	Lyonothamnus floribundus	40 ft	15-20 ft	CA native
Chilean soapbark	Quillaja saponaria	40 ft	15-25 ft	Best for bulb-outs due to large trunk & root flare. Can be hard to source
Musashino sawleaf zelkova	Zelkova serrata 'Musashino'	40 ft	10-15 ft	Weak, narrow branch attachment angle

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