

August 18, 2020

Sent via email

Elias French, PLS
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Bruce Storrs, PLS
City and County Surveyor
Bureau of Street Use and Mapping, San Francisco Department of Public Works
49 South Van Ness Avenue, 9th Floor, San Francisco, CA 94103

Re: Requirement that subdivision maps be based on CCSF-CS13 and provided in AutoCAD format

Dear Mr. Storrs,

On behalf of the San Francisco Chapter of the California Land Surveyors Association (SF CLSA), I write to express our deep concern regarding the Bureau of Street Use and Mapping's (BSM's) new requirements, which have appeared recently in the form of conditions of approval of certain tentative maps, that certain subdivision maps be required to use the city coordinate system "CCSF-CS13" and be provided in AutoCAD file format.

I strongly urge you to review this decision given that these requirements:

1. Were implemented without outreach, notice, or justification to SF CLSA or surveyors.
2. Are without apparent basis in the subdivision code or regulations.
3. Have not been disseminated in any form and are being applied irregularly, based on unknown factors, making it impossible to anticipate or plan for them efficiently.
4. Are in SF CLSA's opinion unreasonable, given that CCSF-CS13 is not readily accessible due to the sparseness of its monuments, and as advanced GPS techniques may be required to access it, both of which factors increase the cost of connecting to it.
5. Necessitate additional field and office time be spent solely to satisfy them, the cost of which is borne by the project sponsor, or, failing that, by the individual surveyor.
6. Are being applied to projects already underway, thus forcing existing maps to be altered and existing documents to be re-drafted, causing confusion among users including attorneys, architects, engineers and contractors, increasing cost and the chance of errors.
7. Force project sponsors to fund services desired by BSM and that might easily be performed by BSM, i.e. surveying for and creation of geo-referenced AutoCAD files.

The best practice for agencies desiring these sorts of requirements is to first conduct outreach to stakeholders, and then implement broadly supported requirements by ordinance. BSM, in contrast, implemented these unilaterally and without notice; a practice which was also used to implement

other recent requirements such as monument identification numbers on all monuments on maps, and “Field Survey Completion Notes” on all maps.

It is the goal of SF CLSA, as the voice of professional land surveyors in San Francisco, to communicate its great desire to work together with BSM to create a positive new paradigm for the public-private surveyor partnership in this city; one in which SF CLSA is utilized by BSM as a resource for outreach and consensus-building on matters of interest to BSM, prior to its creation and implementation of requirements affecting surveying and mapping in San Francisco. I invite you to utilize SF CLSA as a resource for communication and cooperation between your agency and private practice land surveyors in this city, to the benefit of ourselves, our clients, and the public whom which we serve.

Therefore, on behalf of SF CLSA and in good faith, I strongly request that **BSM suspend these requirements immediately**, and begin a process of engagement and communication with SF CLSA should it wish to implement them or any other surveying and mapping requirement in the future.

Sincerely,

Elias French, PLS
President

cc: SF CLSA Executive Committee