



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

July 24, 2014
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, 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.

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

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.