

To: San Francisco Board of Supervisors  
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Subject: SF Planning Department memo dated February 17, 2017 titled  
Appeal of the Final Environmental Impact Report EIR for the Natural Resources Management Plan

The Planning Department issued a rebuttal of our arguments dated February 17. They fail to respond to many of the issues we raise and ignore the facts we presented to support our arguments. In many of their arguments, they cite statements in the EIR as if they were requirements of the SNRAMP. Only what is in the SNRAMP and in the Recreation and Parks Commission plan adoption documents define how the plan must/will be implemented. We will not waste time discussing what the EIR says in instances where the issue is intent of the SNRAMP.

### CEQA Process Violations

Planning fails to address the violation of CEQA process we identify, that the RTC added significant new information to the DEIR. CEQA requires that the document be circulated again for "consultation" when such significant new information is added. Planning failed to do so. See the SF Forest Alliance document, section 4 for a discussion of this. In the rest of this document, we will reference relevant information in the SF Forest Alliance main appeal document as (SFFA 4) for example.

Planning Memo page 9, EIR Certification

The Errata, was added to the EIR package and transmitted to the Planning Commission on December 15, 2016, the date of the certification hearing. This is obviously 10 days too late to be considered as part of the EIR being certified that day.

Below we respond to Planning using their numbering system.

### 1) Tree Replacement

Planning's argument - The SNRAMP commits to replant trees removed from the project area will be replaced within the project area on a one-to-one basis.

They cite an August 24, 2011 memo from RPD that was added as part of an appendix to the DEIR a week before it was released. The memo says trees will be replaced at a "ratio of roughly one-to-one". It does not state the replacement trees will be planted in the project area. This memo is not directly mentioned anywhere in the EIR. Section III.E of the DEIR, page 84, is the only reference to appendix J in the EIR. It says,

"During the development of this EIR, the SFRPD has modified management activities to address evolving management concerns and changes in conditions at the Natural Areas; **these modifications are summarized in Section III.G; a memorandum documenting these modifications will be appended to the final draft SNRAMP** and is included in Appendix J. The final SNRAMP will also incorporate the mitigation measures identified in this EIR."

Section III.G makes no mention of the purported 1:1 tree replacement policy, while it does list many other less significant issues. Further, the three replacement policy was never appended to the final

draft SNRAMP. The version of the SNRAMP adopted by the Rec. Park Commission on December 15, 2016 did not include the modifications.

Planning also references a memo written by Lisa Wayne to show that the NAP intends to replant trees on a 1:1 basis. Wayne presents some vague statements and a lot of extraneous data on plants grown in the native plant nursery. She could easily have made a clear statement that the intent of the Plan is to replant trees on a 1:1 basis within the Natural Areas. She did not. This memo is not part of the SNRAMP.

The SNRAMP which is the subject of this EIR and was adopted by the Rec. Park Commission does not commit to replace trees on a 1:1 basis within the project area. The EIR needs to specify a mitigation measure that trees removed from the project area will be replaced in the project area on at least a 1:1 basis. The measure would require that an accounting system be established to track trees removed and trees planted. The system should record the size, type, location, date and reason for removal and the size, type, date and location of trees planted. This can be easily accomplished using simple cell phone apps. The Urban Forestry Council recommends replanting at a 3:1 ratio and greenhouse gas concerns would push this even higher. See the SF Forest Alliance(SFFA) document section 2.2.

### **1) Tree Removal**

Planning's argument – The intent of the SNRAMP is to remove unhealthy, damaged and dangerous trees, not healthy trees.

In the full set of arguments we presented to the BOS, section 2.4, we cite multiple references from the SNRAMP that show the primary intent of tree removal is to create more open space for grasses and scrub. We provided tree removal maps used by the drafters of the SNRAMP to calculate the number of trees to be removed from each management area. The maps clearly show trees are targeted based on the areas they want to open up for grassland/scrub. Further, below is a table from the SNRAMP that enumerates the trees to be removed from each area.

Table 5  
Summary of Natural Areas Management Plan

Natural Area Site	Park Acreage	Natural Area Acreage	Management Area (acres)				Invasive Trees			Trails (feet)			Dog Play Areas (acres)				
			MA-1	MA-2	MA-3	Total MA	Existing	To Remove	To Remain	Existing	To Close/ Re-route	To Create	Resulting	Existing	To Remove	To Remain	Monitor
Balboa	1.8	1.8	1.1	0.7	0	1.8	0	0	0	837	90	0	547				
Bayview Park	43.9	43.9	8.2	15.8	19.7	43.7	6,000	511	5,489	8,498	1,439	1,020	8,077				
Bernal Hill	24.3	24.3	7.8	5.8	10.7	24.1	100	0	100	12,239	4,544	464	8,159	21.0	6.0	15.0	No
Billy Goat Hill	3.5	3.5	0.8	1.1	1.8	3.3	20	0	20	2,600	745	0	1,855				
Brooks Park	3.5	2.0	0.8	0.9	0.3	2.0	20	3	17	1,340	456	0	884				
Buena Vista Park	36.1	6.1	0	6.1	0	6.1	140	10	130	3,741	0	0	3,741	1.0	0	1.0	Yes
Corona Heights	12.6	9.6	2.9	2.5	4.2	9.6	200	15	185	6,701	1,845	0	4,855	0.4	0	0.4	No
Dorothy Erskine Park	1.5	1.5	0.2	0.3	1.0	1.5	100	14	86	771	0	0	771				
Duncan-Castro	0.5	0.5	0.3	0.1	0.1	0.5	0	0	0	333	0	0	333				
Edgehill Mountain	2.3	2.3	0	0.9	1.4	2.3	300	0	300	747	0	438	1,185				
Everson/Digby	1.2	1.2	0.9	0.1	0.2	1.2	0	0	0	0	0	0	0				
Fairmount Park	0.7	0.7	0	0	0.7	0.7	100	0	100	187	0	0	187				
Glen Canyon Park and O'Shaughnessy Hollow	72.6	63.8	8.1	33.0	22.4	63.5	6,000	120	5,880	23,242	3,653	0	19,589				
Golden Gate Heights	6.0	0.8	0.2	0.5	0.1	0.9	30	0	30	558	380	168	357				
Golden Gate Park Oak Woodlands	1,021.0	26.2	0.7	25.6	0	26.2	900	82	818	24,844	12,381	0	12,463	2.8	0	2.8	Yes
Grandview Park	4.0	4.0	0.9	2.4	0.7	4.0	25	5	20	1,722	408	0	1,313				
Hawk Hill	4.5	4.5	1.4	3.0	0	4.4	10	0	10	1,608	682	0	917				
India Basin Shoreline Park	11.8	6.2	3.2	2.8	0	6.0	0	0	0	1,885	0	0	1,885				
Interior Greenbelt	19.4	16.5	0	1.6	14.7	16.5	5,800	140	5,660	935	0	620	1,555				
Kite Hill	2.7	2.7	0.6	0.5	1.6	2.7	10	0	10	1,857	398	0	1,459				
Lake Merced	614.0	395.0	60.6	101.8	231.5	394.1	12,600	134	11,866	11,106	3,319	365	8,152	5.0	5.0	0	
Lakeview/Ashton Mini Park	0.5	0.5	0.1	0.2	0.2	0.5	0	0	0	651	0	0	651				
McLaren Park	312.6	165.3	34.9	69.3	61.4	164.6	19,500	809	18,691	59,185	15,681	0	43,504	61.7	8.3	53.4	Yes
Mount Davidson	40.2	40.2	8.8	11.0	20.1	39.9	11,000	1,600	9,400	15,456	2,867	0	12,589				
Palou-Phelps	2.5	2.1	0.8	0.4	0.8	2.0	40	2	38	1,049	527	498	1,019				
Pine Lake	30.3	8.4	1.0	3.8	3.6	8.4	1,000	0	1,000	3,157	608	13	2,562	3.3	0	3.3	No
Rock Outcrop	1.6	1.6	0.8	0.7	0	1.5	0	0	0	0	0	0	0				
Tank Hill	2.8	2.8	1.5	0.6	0.7	2.8	50	0	50	2,672	1,411	0	1,261				
Twin Peaks	34.1	31.1	12.6	14.3	3.8	30.7	88	3	85	8,741	2,303	501	6,939				
16th Avenue Steps	0.3	0.3	0	0.2	0	0.2	0	0	0	0	0	0	0				
San Francisco Subtotal	2,312.9	889.5	159.0	305.1	401.5	865.6	63,433	3,446	59,985	196,562	53,758	4,165	146,999	95.2	19.3	75.9	
Sharp Park (Pacifica)	411.0	237.2	35.0	125.1	76.5	238.6	54,000	15,000	39,000	14,741	653	1,792	15,860				
Total	2,723.9	1,106.7	194.0	430.2	478.0	1,102.2	117,433	18,446	98,985	211,303	54,411	5,897	162,789	95.2	19.3	75.9	

The condition of the trees has nothing to do with the number of trees the SNRAMP plans to remove from each area.

Planning makes a dangerous statement on their page 12.

“RPD staff could remove seedlings or saplings that have a DBH of 6 inches or less (or a height of 15 feet or less), but the SFRPF arborist would be consulted in the in the evaluation of the removal of trees.”

This seems to be an attempt to broaden the definition of a Sapling which RPD can cut freely without counting it as a tree. The SNRAMP defines a Sapling based strictly on height. The 6” DBH measurement has nothing to do with whether a tree is small enough to be considered a Sapling. NAP staff are allowed to cut down trees smaller than 6” DBH. However, if they are taller than 15 feet, they must be counted as trees. They must call in the arborist to have that staff cut down larger trees.

**1) forest management objectives**

This is just a repetition of the two arguments above.

**2) Environmental justice**

Planning’s Argument - Tree removals and trail closures are not unfair to disadvantaged neighborhoods in SE San Francisco.

Our City’s SE neighborhoods need trees. The SNRAMP plans significant tree removals from Bayview Hill and McLaren Park. The SFFA argument they refer to is that even if a mitigation measure is added requiring 1:1 tree replacement, these neighborhoods will suffer if trees are removed in these parks and the replacements planted on other natural areas across town.

Under the SNRAMP the SE neighborhoods will lose access to a huge portion of their parkland. As they did in the EIR, Planning continues to obscure the fact that the SNRAMP will make access to Natural Areas on-trail only. The other 95% of the Plan areas are to be off limits to the public. We discuss this extensively in our documents and present maps illustrating what areas of our parks we will be allowed to enter. See section 1 of the SFFA document. The impact for the disadvantaged SE neighborhoods is more severe than for other parts of the City because half of McLaren Park and all of Bayview Hill (except for the road) are subject to the SNRAMP. The SNRAMP takes these parklands away from the people. This is a huge impact on the recreation which is an environmental effect required to be analyzed under CEQA.

Planning presents the changes in trails under the SNRAMP as a red herring to divert attention from the issue we raised, which is the restricting the public to designated trails and prohibiting them from entering the parks at large. We have been perfectly clear this is the heart of the access issue. **The fact that Planning does not respond to it makes it perfectly clear they are trying to hide this intent of the SNRAMP.**

### **3) trail closures**

Planning's argument - only RPD's GIS experts can look at the SNRAMP maps and measure the lengths of trails closed. Trails the SNRAMP drafters thought to be significant enough to be included on the maps and included in the tabulations of Natural Areas trails are not relevant to this discussion.

The SNRAMP plans to close 22% of our trails. That is already a major impact on recreation. The NAP has actually closed over 50% of the trails in areas where they have implemented their "trail improvement" and "Urban Trails" programs. This is not "alternative" data. This is factual information based on the maps contained in the SNRAMP with the trail lengths measured using a CAD (computer aided design) program. You can see in the table presented by SFFA (SFFA 5) that our tally of initial trails, and trails planned to be closed under the SNRAMP are in close agreement, i.e., our re-measurement of the SNRAMP maps is accurate. We are not counting any trails except those recognized in the SNRAMP. The actual maps are presented in our Appendix F.

### **4) Will implementing the Plan require additional herbicide use?**

Planning's argument - Herbicide use by the NAP will continue as it has for existing activities. Tree removals are spread over 20 years so repeated Tier 1 herbicide applications to the tree stumps will not require herbicide.

The EIR claims herbicide use by the NAP will not increase with implementation of the SNRAMP, in other words, that the SNRAMP does not require the use of herbicide. This cannot be correct. (SFFA 3) We do not have to argue that the actual herbicide use required by the SNRAMP will have a significant environmental impact. The issue here is that the drafters of the EIR falsely claim that the Plan will not require additional herbicide use and thereby, avoid having to make a good faith effort to assess the impact of the herbicide use.

### **5) Does the NAP actually intend to install much more fencing than the SNRAMP discloses and the EIR analyzes?**

Planning's argument - the fences installed to date do not have a negative impact on aesthetics and they were installed for public safety and to keep people from going off trail and walking on the plants.

The fences installed to date by the NAP to close trails and to confine people to on-trail use only are certainly much more extensive than what is disclosed in the SNRAMP. (SFFA 9 & Appendix F) The data

we present differentiates between fences installed for public safety and fences installed for public access control. Virtually all of it is to prevent the public from accessing parkland. It has nothing to do with public safety. Go take a look at Glen Canyon. One short length of fence on the west side of the creek was installed to prevent people from falling off the edge of the retaining wall. The rest is all to prevent the public from accessing parkland. There is one narrow trail with precipitous drops off a rocky bluff. No fence was installed there, even though it is the most dangerous trail in the entire park. (We do not want a fence there.)

The large quantity of fencing installed to date demonstrates the actual intent of the SNRAMP. The fences are an un-natural blight on our natural landscapes.

#### **6) BOS 653-02**

Planning's Argument – The resolution does not prohibit the Rec Park Commission from adopting the SNRAMP.

Our point in citing the resolution is that it forbade RPD from implementing the natural areas Plan until the Plan was approved and it defined what actions by RPD would constitute implementation of the Plan. (SFFA 7)

#### **7) Implementing the SNRAMP in advance of certification of its EIR**

Planning's argument – Anything the NAP did from 2015 until December 15, 2016 was in accordance with the 1995 Management Plan or was part of another project independent from the SNRAMP.

Planning claims the trail closures in Glen Canyon were independent of the SNRAMP. They were not independent. The trail closures were selected by the NAP and many of them were closures intended to be executed under the SNRAMP. Planning does not address the trail closures in other parks which are part of the SNRAMP and were executed by the NAP before December 15, 2016. The same goes for the access control fences. (SFFA 7)

The NAP did indeed install signs in January and February 2015 in virtually all Natural Areas restricting the public to on trail use only and prohibiting bicycles. Previously the public was free to access all Natural Areas. (SFFA 1) People with bicycles were allowed to access all Natural Areas. (SFFA 8) This is a major impact on Recreation and it was implemented before Certification.

Planning repeats the false claim that the Glen Canyon trail from O'Shaughnessy to Silver Tree was closed prior to the start of the EIR process. (SFFA 10E)

#### **8) Greenhouse Gas (GHG) Emissions**

Planning's argument – nobody will spend the time to try to wade through this. It looks official.

Statement of issue, page 19 SFFA did not argue the GHG emissions from cutting down saplings would be significant. We argued that the lost future sequestration would be significant, and vastly more important than any replacement trees that might possibly be planted.

Planning claims if they say their GHG calculations are right and we say they are wrong, this is a "disagreement among experts" and there is no basis for rejecting the EIR certification. This is not a disagreement among experts. The calculations are just plain wrong. They cite methods developed by experts, but then use the methods incorrectly. You do not need to be an expert to see what they are doing is wrong. You just have to take the time to look at what they did. Please read sections 2.3 of the SFFA paper.