

To: San Francisco Planning Commission

Dec. 6, 2016

Subject: Planning Case number 2005.1912E SNRAMP

Commissioners,

On December 2 you received my arguments against certification of the SNRAMP EIR. I apologize, but I have a correction for page 6 of the document. I have highlighted this on the following page. I had stated there were no documents proving the existence of a 1:1 tree replacement policy. The EIR does cite one memo in this context.

"As stated in Draft EIR Chapter III, Project Description, p. 92, invasive trees that are removed in San Francisco would be replaced with native tree species at a ratio of roughly one-to-one, although not necessarily at the same location or within the same Natural Area. In a memorandum from Lisa Wayne, Open Space Manager, SFRPD, to Jessica Range, Environmental Planner, San Francisco Planning Department, 55 the SFRPD indicated that each year, the NAP propagates and plants over 10,000 plants in restoration sites throughout the city, with at least 200 of those plants being trees."

This memo says the Program would replace removed trees with some other species, "primarily native trees". This leaves the possibility of replacing removed trees with shrubs or grasses. It does not state that replacement trees would be planted in the Project Area as the EIR claims. This is not what anyone would consider a documented policy. It is an insider memo from one department to another that will carry no weight once this EIR is certified. Almost no one has seen it. I obtained my copy via the Sunshine Ordinance.

The establishment of a firm 1:1 tree replacement requirement, the recording of data on trees removed and trees planted, and the definition of what plantings qualify as trees must be added to the EIR as a mitigation measure

Sincerely,



Tom Borden
SF Forest Alliance, Leadership Group

requirement for these trees and no record of the cutting is required. This is a major accountability issue that puts 27,100 trees at risk. This must be addressed. **There must be a mitigation measure that requires record keeping of all tree cutting.** This should also include trees killed by girdling or by chemical means such as Drilling, Frilling, & Basal Bark treatments. Given the plan calls for cutting 3424 trees over a 20 year period, this would not be an onerous task. It is only about 14 trees per month.

1.2 Trees 1:1 Replacement

The DEIR states the SNRAMP institutes a 1:1 tree replacement policy, that every tree removed in the project area would be replaced with a new tree somewhere in the project area. This is a false premise. No such commitment appears in the SNRAMP. Nor is there any section of San Francisco Code that would require the RPD Natural Areas Program to plant a new tree for every one they remove. The EIR cites no **documented public policy** to support this assertion, yet it makes the claim over and over again:

The DEIR (pages 92,456, 484, 514) states that, "Trees removed in the Natural Areas in San Francisco would be replaced at a one-to-one ratio, although not necessarily in the same location." This commitment does not appear in the SNRAMP.

The DEIR (page 408) says, "The total number of trees would not change within the Natural Areas of San Francisco". This does not appear in the SNRAMP.

The DEIR (page 92) says, "Invasive trees removed in San Francisco would be replaced with native tree species at a ratio of roughly one-to-one, although not necessarily at the same location or within the same Natural Area." This does not appear in the SNRAMP.

The CEQA process for the Beach Chalet Fields, Planning Case 2010.0016E revealed that SFRPD has no policy or ordinance requiring 1:1 tree replacement. See the RTC Page X.L-41. As a result, a mitigation measure was added to that EIR.

Mitigation Measure M-BI-3

The San Francisco Recreation and Park Department (SFRPD) shall replace the trees removed within SFRPD-managed lands with trees of equivalent ecological value (i.e., similar species providing the same general microhabitat characteristics for wildlife species) to the trees removed. If trees of equivalent ecological value are not feasible or available, removed trees shall be replaced at a ratio of 1 inch for 1 inch of the diameter at breast height of the removed tree. SFRPD shall monitor tree replacement plantings annually for a minimum of three years after completion of construction to ensure establishment of the plantings and, if necessary, shall replant to ensure the success of the replacement plantings.

Why would the SNRAMP EIR, where the scale of tree removal dwarfs that of the Beach Chalet Fields, be considered adequate when it does not include a mitigation measure to insure tree replacements are carried out?

The Plan cannot be properly executed unless an accounting system is put in place to track these things. RPD does not have a system to do so. All they have is a quarterly report from their arborist tallying the number of trees the arborist group planted and