

To: San Francisco Planning Commission

From: Dee Seligman, San Francisco Forest Alliance

Date: November 29, 2016

Subject: CEQA issues in Planning Case #2005.1912E SNRAMP

On Dec. 15, 2016 you will hold a joint hearing to decide on the certification of the EIR for the Significant Natural Resource Areas Management Plan. I request that you not certify the document at this time because it has many CEQA issues of inaccuracy, inadequacy, and lack of objectivity that must be addressed before it is reasonable for the Planning Commission to review it for potential certification. Planning and its Environmental Review Officer of Planning should carefully consider each of these issues before the document is brought for final certification.

Sincerely,

Dee Seligman

Interim President, San Francisco Forest Alliance

Response to Comments (RTC) is:

Inaccurate

1. **RTC calls blue gum eucalyptus as “invasive”**, but they are at the lowest level of invasiveness (LIMITED) according to CAL Invasive Plant Council. Indeed, the new definition of invasive species of the Response to Comments is “**Invasive species –A species that is non-native (or alien) to the ecosystem under consideration and whose introduction causes or is likely to cause economic or environmental harm or harm to human health.**”

Blue gum eucalyptus are not causing economic, environmental, or human health harm.

2. **RTC indicates thinning will help encourage growth** and the health of the forest. But thinning would not help because thinning is only beneficial when trees are young (in the pole stage) and vigorous enough to take advantage of the reduced competition. Otherwise, the benefits obtained from thinning mature trees will be negligible. The possible damage likely to result from the thinning, including exposure to windthrow and damaging their intergrafted roots of surrounding eucalyptus, will very likely outweigh any benefits from reduced competition. (source: Florence, R.G. 2004, *Ecology and silviculture of eucalypt forests and Silvicultural Guidelines* published by State of NSW and Department of Environment, Climate Change and Water)
3. **RTC indicates that the trees to be removed because they are dead, dying, or diseased**, but SNRAMP does not say that. It only describes the cause for removal based on the so-called “invasiveness” of the trees and a need to protect sensitive species. The order in which trees will be removed is dead, dying, or diseased trees will be removed first.
4. **RTC states unequivocally that no bond money has been used for physical improvement of trails** until EIR is certified. Also “nothing of SNRAMP will be initiated before certification.” (Response G-3). RTC acknowledges \$4Million budget from the 2008 Bond money was spent on the Glen Canyon Trail Restoration Project to address “invasive plant and hazardous tree removal, and enhanced the trail experience in Glen Canyon Park.”

In fact, considerable bond money has been spent on capital projects that have resulted in extensive fencing and trail closures in the following parks. Bond money is supposed to be used only for capital projects (i.e. long lasting, presumably in excess of 5 years, etc.), not maintenance projects. Fencing and trail closures are all NAP projects carried out in the project area and documented as planned closures to be performed under SNRAMP but implemented before certification.

Billy Goat Hill Phase II	Park Bond	Park Trail	\$64,737.00	some fence and 2010 ft. or 76% trail closures	100% NAP land
Corona Heights Phase II	Park Bond	Park Trail	\$204,816.00	1436 ft split rail and wire fencing and 3485ft. or 56% trail closure	76% NAP land
Glen Canyon Phase II	Park Bond	Park Trail	\$1,611,787.00	760 ft split rail fence and 8,668 ft. or 37% trail closures	88% NAP land
Grandview Phase I	Park Bond	Park Trail	\$304,264.00	Split rail fencing and 856 ft. or 46% trail closures	100% NAP land
Bayview Hill Trail Restoration	Park Bond	Park Trail	\$45,000.00	1 new fence 430 ft. chain link; 80 ft. split rail; locked gate blocking access or 76 % trail closures.	100% NAP land
McLaren Park Trail	Park Bond	Park Trail	\$272,129.00	168 ft. split rail and some trail closures. Mostly vegetation removed and 3 new native plant gardens.	53% NAP land
Mount Davidson Trail	Park Bond	Park Trail	\$24,000.00	Signage prohibiting bicycles.	100% NAP land

5. **RTC states only 30% of Mt. D forest will be thinned or have trees removed, what SNRAMPT terms “individuals or very small groups of trees within existing forest and scrub habitats.” (SNRAMPT, Appendix F-7).**

This is not thinning, but deforestation. SNRAMPT shows high percentages within a 10-acre area where a minimum of 1600 trees will be removed:

MA 1-C	1,000 trees to be removed	82%
MA 2-C	200 trees to be removed	31%
MA 2- E	400 trees to be removed	23%

*This 1600 total does **not** include the 100 trees cut for PUC pipeline project; nor 50+ trees girdled by native plant advocates; nor an unknown number for forestry and trail restoration projects; nor the trees under 15 ft. with a diameter of 6 inches or less at breast height, which are not counted as trees.*

The RTC does define Mt. Davidson as a “historic urban forest” and one potentially that could be classified as an *ethnographic*, and possibly also as a *vernacular landscape*, specific historic classifications. The RTC claims that “selective tree removal would help to restore the historic balance of tree species within the forest and preserve its historic character. The project would not cause a substantial adverse change in the significance of the resource....” (5.A.6 Section V.D. Cultural and Paleontological Resources)

This is NOT “selective tree removal”. It is deforestation of nearly 10 acres of urban forest.

RTC claims no more than 15% of existing trees will be removed from Natural Areas within the city nor will all trees be removed from any one location (Response to Comment BI-33). **But what about the high percentages above within one forest like Mt. Davidson?**

6. **RTC states all removed trees will be replaced.** EIR says roughly on a 1 to 1 basis and not necessarily at the same location or within the same Natural Area. SNRAMP does not talk about replacement other than by native plant understory scrub.
7. **RTC states trees to be removed over 20-year period.** This would be a highly expensive method that does not take advantage of economy of scale when heavy equipment is needed. It is unlikely large numbers of trees would be cleared over such a long time-period.
8. **RTC states the IPM Program promotes nonchemical control strategies** instead of **chemical herbicides**. Other than occasional references on signs to the failure of hand-pulling, there is **no evidence of systematic attempts for restoration** by RPD using any of the following methods in the Natural Areas:
 - Tarping (the most successful method used in the Presidio); layered sheet mulch; conventional deep mulching;
 - Herbicidal soaps; botanical/organic herbicides;
 - Biological controls of host-specific insects or pathogens ;
 - Cultural controls like choosing pest-resistant plants and companion planting.
 - Mechanical alternatives like pressurized water; other mower heads; sub-soil brushing; weed wrench alternatives;
 - Goats for smaller scale grazing.

In fact, San Francisco’s Natural Areas program, in its early stages in 1999, focused only on using volunteers to hand-remove unwanted plants and did not plan to rely on herbicides.

Inadequate

1. **RTC does not define** “biodiversity.” Nor is a definition provided in the draft EIR, the final EIR (RTC) nor even in SNRAMP.

RTC uses “biodiversity” to refer to SNRAMP’s objective to “identify, prioritize, and implement restoration and management actions designed to promote the functioning of San Francisco’s native ecosystem, including the maintenance and enhancement of **native** biodiversity.” (Response to BI-20)

SNRAMP and its native plant advocates cite San Francisco's 1997 Sustainability Plan that, in turn, refers to Edward O. Wilson's definition of biodiversity.

In fact, Wilson does not use the word "native" to describe biodiversity. He defines biodiversity as:

"the totality of all variation in life forms of Earth" and says it is studied in three levels - ecosystems, species, and genes. *Planet Earth, The Future* (2006), p. 27

"Native" was inserted into the Sustainability Plan, into SNRAMP and into the EIR by local native plant advocates who have an agenda to push.

By adding the word "native" to "biodiversity", any non-native tree is demonized. In fact, our urban forests are historically a part of the totality of variation in San Francisco and have been so for almost 150 years. We believe all trees and plants, whether native or non-native are part of our local biodiversity and should be so regarded.

2. **RTC states air quality impacts are "unavoidable" and "significant" but manual removal techniques for tree removal will be used whenever possible and all trees removed from Natural Areas will be replaced, although it does not indicate where** (Response AQ-1). Air quality is issue of environmental justice since McLaren Park is located between freeways and asthma rates are high (refer to MIT study on this.) Also, tree replacement is not necessarily in the same location or in the same park, according to EIR.
3. **RTC states trash management is part of "regular Rec and Park Dept. operations"**, a standard developed after Prop C in 2003. (Response PD-19). But in fact the open spaces in NAP specifically **are excluded from** being inspected for cleanliness; there is no trash management for NAP (*San Francisco Park Maintenance Standards*, 2005, p. 17) .

The standards define the desired conditions of park features such as lawns, trees, and trails, and are used to assess and evaluate conditions in San Francisco parks each year. In the San Francisco Park Maintenance Standards Manual (August 2006), there is a single maintenance standard for open space – cleanliness, defined as: "From a 10 feet distance (i.e., from the nearest path), open space is free of litter and debris." The manual goes on to say that the standard is met if no more than 15 pieces of litter are visible in a 50' by 50' area or along a 200' line, and that the standard is not met if needles, condoms, broken glass, and/or feces are present.

Certainly people in natural areas, including those walking on trails, have a right to expect the natural areas to meet such a simple cleanliness standard. However, the Manual goes on to say: **"Open space-natural areas are not included in this standards manual, and therefore, are not inspected."** Even in the current *Evaluator's Manual*, trails in Natural Areas are specifically excluded from any evaluation. (*Evaluator's Manual*, RPD, 2014, p.6)

4. **RTC uses an inadequate, unsupported cost-benefit analysis** by indicating even with "significant environmental impacts, the Planning Commission can approve a project if the benefits outweigh the costs." (Response AI-12) How do we assess the benefits as a public good that outweighs the financial costs and the dangers of exposure to herbicides? Isn't this value-laden? **This is heart of the matter.** The precautionary principle asks "is the hazardous activity necessary"? What less-hazardous options are available?" and "How little damage is possible?"

Non-objective

1. **RTC states the “environmentally superior ecological alternative”** is differentiated from “**environmentally superior alternative**.”(Response to AL-10) This is equivocation, pure and simple, defined as “the misleading use of a term with more than one [meaning](#) or [sense](#) (by glossing over which meaning is intended at a particular time”).[*Wikipedia*] It looks like the phrase “superior ecological” is substituted for “environmentally superior” as a way to push through the Maximum Restoration Alternative, which is what the Sierra Club letter asks for. There is no explanation given of the difference in concepts.
2. **RTC conflates native plants with being more drought-tolerant, more adaptable to climate change and requiring less irrigation than other plants. No evidence is provided.** These attributes can be found in both native and in non-native species and are not related to point of origin.(Response GG-2)