

To: San Francisco Board of Supervisors

2/13/17

From: San Francisco Forest Alliance
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Subject: Appeal of the Certification of the EIR for the Significant Natural
Resource Areas Management Plan
SF Planning Case number 2005.1912E

This document and its 8 appendices (A through H) comprise our full set of arguments and supporting evidence.

This appeal is not about whether you prefer trees or grass, whether you want to preserve and expand our historic native habitat or accept the changes caused by humans and nature. This appeal is about accountability and transparency. Does the EIR correctly identify the significant environmental impacts of the SNRAMP and have mitigation measures been put in place to minimize or eliminate those impacts?

The EIR for the SNRAMP is inaccurate and inadequate and biased. The poor quality information it provides is not sufficient to enable informed decisions about the Plan. The process used to bring the DEIR to certification violated CEQA and local regulations. Here are the issues.

- 1 Public access restrictions: The SNRAMP calls for us to surrender public access to 28% of our parkland. The Project applies to one third of our parkland. Public access will be restricted to on-trail only, or less than 5% of current access. Comments on the DEIR asked that this be addressed. The FEIR fails to respond to this.
- 2 Greenhouse gas release: The FEIR claims implementing the SNRAMP will result in reduced emissions of greenhouse gasses (GHG). Actually, the GHG releases that would result from Plan implementation are a Significant Environmental Effect that is hidden by the EIR. Carbon sequestration is dramatically miscalculated, equipment emissions are not included and methane and carbon dioxide emissions from decay of the destroyed trees are ignored.
- 3 Increase in herbicides: The SNRAMP is dependent on the use of herbicides. However, the FEIR claims there will be no increase in herbicide use with SNRAMP implementation. In other words, the SNRAMP does not require the use of herbicides. It is impossible for this to be correct. The “no increase in herbicide use” is an entirely new conclusion the DEIR did not present.
- 4 CEQA process violations: The process utilized by Planning violated CEQA, thereby preventing proper vetting of the EIR. External agencies and the public were never allowed to challenge major changes made to the DEIR, such as the nonsensical greenhouse gas analysis; the assertion of no increase in pesticide use; and the mitigation of acidic soils at Laguna Salada.

In addition, the Certification hearing involved multiple violations of the San Francisco Administrative Code.

- 5 Trail closures: The SNRAMP plans closure of 26% of our trails. In parks where the NAP has already implemented its "Trail Improvement Projects" over 50% of the trails have been closed. The EIR does not address this significant impact on public recreation.
- 6 Tree replacement: The EIR analysis of the Project's impacts on air quality, greenhouse gas emissions, aesthetics, wind and hydrology hinge on a false premise, that every tree removed in the project area would be replaced with a new tree somewhere in the Project area.
- 7 Implementation before Certification: The EIR claims the SNRAMP has not been implemented ahead of the EIR certification. This is false.
- 8 Cycling prohibition: The EIR claims, "The SNRAMP does not single out bicyclists as a concern and does not include actions directed specifically at bicycle use." This is false. The Plan prohibits bicycles in the program areas. This is contrary to our Transit First, Green Connections, ROSE, Children's Outdoor Bill of Rights and other policies.
- 9 Impact of fencing ignored: The NAP's implementation of the SNRAMP in advance of the EIR demonstrates that their use of fences will be much more extensive than what is disclosed in the SNRAMP. The EIR does not address this significant impact on public recreation and aesthetics.
- 10 Bias: Bias in the EIR is demonstrated by the inclusion of "alternate facts", such as the Mt Davidson bench removal and the Glen Canyon Miraloma trail closure.

1 Public Access Restrictions, On-Trail Use Only

The intent of the SNRAMP is to restrict public access to designated trails only. Not only does this mean closing social trails and other trails the planners find undesirable, it also means access will be limited to **on-trail use only**. Multiple commenters raised this issue. The Response To Comments (RTC) recognizes the comments, but it fails to address them. The fact that the Plan will deny public access to more than 95% of the Project area must be addressed.

The SNRAMP is a bit vague in expressing its intent. The drafters knew direct statements would draw direct fire from the public. Here is what is in the SNRAMP.

Recommendation GR-11C in the SNRAMP says, "Public use in all Natural Areas, unless otherwise specified, should encourage on-trail use." It goes on to say, "interpretive and park signs should be installed or modified as appropriate to include "Please Stay on Trails" and then, "If off-trail use continues in a particularly sensitive habitat (e.g., wetlands), permanent fencing shall be considered as a last resort once all other options, including enforcement, have failed."

Page 1-6 of the SNRAMP makes it clear that public use of MA-2 areas will be on-trail only.

“Relatively fewer use restrictions will be implemented within the MA-2 areas. In general, all passive recreational uses will be allowed in these areas as long as they include **on-trail use only** and leashed pets”

In the preceding paragraph on the same page it discusses MA-1 areas but does not mention on trail use only. Clearly, if the less sensitive MA-2 areas are on-trail only, the MA-1 areas will be on-trail only as well.

The SNRAMP does not call for on-trail use only in MA-3 areas, but only talks about closing social trails.

Action by the NAP since the SNRAMP was written confirms the actual intent is to restrict the public to on-trail use only in all Natural Areas, including MA-3. In early 2015, the NAP installed signs in virtually all of its Natural Areas requiring that users, “Stay on Designated Trails” threatening \$100 fines via Park Code 3.02.



Please note, the installation of these signs is a clear violation of CEQA. The NAP is instituting new public access restrictions which are part of the SNRAMP in advance of its EIR certification.

The impact on the public is huge. Consider the Plan covers 836 acres of land in San Francisco. (SNRAMP page 43) Prior to the NAP's access restrictions, all of that was freely available to the public. Once the Plan is implemented, the public will be restricted

to 30.6 miles of trails. (SNRAMP page 52) Assuming the average usable width of a trail is 10 feet, the acreage available to the public under the Plan will be just 37 acres, or 4.5 percent of what we had.

Multiple commenters raised this issue and are quoted in Response To Comments (RTC). In one section after another, the RTC ducks this issue.

Response PD-6 “Opposition to the proposed public access restrictions” page 4-145
“The proposed project is a management plan for the current program area and does not create new Natural Areas or restrict access to the existing Natural Areas, but instead focuses on enhancing native communities within existing Natural Areas.” This statement is incorrect. Clearly they are restricting access to existing Natural Areas.

Response G-5 “Impacts of Natural Areas access restrictions on social fabric of San Francisco” page 4-31 “These comments express concern that the SNRAMP would prohibit access to the Natural Areas” The response only talks about trails and ignores the fact the SNRAMP would restrict use to on-trail only.

Response RE-8 “Impacts resulting from restrictions on recreational access” page 4-323 This response is supposed to address denial of access. Commenters say that,
“A majority of land under NAP control citywide (57%) will have significant restrictions to access by all people (not just people with dogs); that is the amount of land designated as MA-1 and MA-2.”

The response talks about on-leash dog walking and a designated trail system and then suddenly concludes,
“Therefore, the proposed project would not result in large-scale restrictions on recreational access.”

Again, the drafters completely refuse to recognize the issue that the Plan will convert our parks from free use to on-trail use only.

RE-10 “Recreational analysis related to trails” page 4-330
This is supposed to address comments that call for the EIR to analyze the impacts of **confining recreation activities to trails**, as well as the closure of trails in Natural Areas. The response proceeds to discuss trails at length but never addresses the issue in bold above. They duck the question again. The response does not acknowledge the vast acreage that would be closed to the public due to on-trail use only.

The NAP controls the entire park in over half of the parks with natural areas (18 of 32 parks). In an additional 10 parks, NAP controls over 50% of the park. Only 4 of 32 parks with natural areas have less than 50% of their land controlled by NAP. So when NAP confines access to trails only, in 18 parks, that closure affects the entire park, not just a small portion of each park. People are losing access to their neighborhood parks.

It is important to note that parks in the underserved neighborhoods of S.E. San Francisco contain large percentages of Natural Areas. This is because we never spent money to develop those parks and just left the land as-is. Now this Plan intends to close those undeveloped parklands to public use. Half of McLaren Park, most of Bayview Hill and most of India Basin are Natural Areas. The residents can ill afford to lose the limited park resources available to them. **Implementing the access restrictions of the plan is a form of environmental racism, forcing already disadvantaged neighborhoods to carry a disproportionate burden of these access closures.**

The Children's Outdoor Bill of Rights adopted by the BOS in October 2013 <http://www.sfbos.org/ftp/uploadedfiles/bdsupvrs/resolutions15/r0081-15.pdf> includes the promise that our children will be able to, "Explore all the wild places in the City". Restricting children to on-trail use only in our natural areas flies in the face of this.

The EIR completely fails to address the issue of on-trail access only. The EIR claims Recreation is an Effect not found to be significant. (DEIR page 442) **This is an incorrect conclusion, reducing public access to only 5% of the Program area is a Significant Environmental Effect.**

2 Greenhouse Gas Release, an inconvenient truth

The EIR grossly miscalculates the greenhouse gas (GHG) releases that would be caused by implementation of the SNRAMP. Implementing the Plan would result in a significant release of GHGs, not a reduction as the EIR claims. In total, the vegetation change contemplated by the Plan would release 44,035 metric tons of CO₂ and prevent the capture of 28,600 metric tons of CO₂ that would otherwise occur. This is a net release of 72,635 metric tons of CO₂. Actually, the situation is much worse since much of the carbon in the felled trees would actually be released as methane, a GHG with 34 times the Global Warming Potential of carbon dioxide.

Therefore the project conflicts with:

San Francisco's 2008 Greenhouse Gas Ordinance, SF Environment Code Chapter 9, sections 900 to 908

and with

California's goal of reducing GHG emissions set forth by the timetable established in AB 32 California Global Warming Solutions Act of 2006

The GHG release is automatically Significant since it conflicts with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

The error in the IER comes from a variety of sources:

- 2.1 The EIR ignores that the Plan allows and does not count the cutting of 11,920 existing "saplings" in San Francisco.
- 2.2 The EIR assumes trees removed will be replaced on a 1 to 1 basis in the project area. This 1 to 1 replacement is not part of the SNRAMP.
- 2.3 The EIR claims to use an accepted calculation methodology, but instead makes up its own to reach a false conclusion.
- 2.4 The EIR misstates the forest management objectives of the SNRAMP.
- 2.5 The EIR assumes any replacement trees planted will be trees. Actually, shrubs and "grassland species" are suggested when replacing trees is discussed in the SNRAMP.
- 2.6 The EIR fails to account for the GHG emissions from vehicles and equipment used for the project.

- 2.7 The EIR does not account for the GHG releases that will result from the 60,000 cubic yards of organic material dredged from Laguna Salada to convert it from marshland to open water.
- 2.8 The EIR does not even mention methane. As the trees cut down under this plan decay, the carbon in them will be released in the form of carbon dioxide and as methane. Methane is much more damaging for our environment than carbon dioxide.

The San Francisco Forest Alliance engaged the services of the Quercus Group to provide expert opinion on the EIR GHG analysis. Please see Appendix A. That testimony validates our analysis and reveals additional shortcomings of the EIR analysis.

The idea that the landscapes envisioned in the SNRAMP will sequester more carbon than today's landscapes defies common sense. Compare early pictures of San Francisco with those of today. Where is all the carbon in those historical landscapes? You can see it in the large trees we have now. The SNRAMP is not taking the landscape back to 1790, but it is moving in that direction. Yet the RTC states, "the proposed project is expected to result in a net increase in carbon sequestration capacity within the Natural Areas in San Francisco." (page 4-285) The land use conversion in Sharp Park, where 15,000 trees are to be cut down and replanted with grasses, is claimed to increase carbon sequestration. (page 4-301) This is crazy talk. Obviously the science cited in the EIR is being used incorrectly.



Mt Davidson today



Mt Davidson tomorrow?.... Which landscape holds more carbon?

2.1 Saplings

The SNRAMP defines a Tree as a tree having a dominant vertical trunk greater than 15 feet tall. Smaller trees are considered “Saplings”. (DEIR page 92) The SNRAMP allows Saplings to be cut without any limitations or accounting. These small trees are what would normally regenerate our forests, replacing trees as they fall to age or disease. There are a lot of these young trees in our natural areas.



Forest in McLaren Park

A US Forest Service survey of San Francisco’s urban forest cited in the EIR reports that 31.4% of trees in the City are 1 to 3 inches in diameter at breast height (DBH) and that

51.4% of trees are less than 6 inches DBH.¹ Monterey Pine and Monterey Cypress trees less than 3" DBH are typically short enough to qualify as saplings. Eucalyptus tend to be taller for the same trunk diameter. Perhaps an average Sapling cutoff would be 2.5" DBH. To get an idea of the scale of this issue, let's make a conservative assumption that half of trees 1" to 3" DBH are Saplings.

This means 15.7% of the trees are Saplings and 84.3% are Trees in terms of the SNRAMP.

Since the San Francisco Natural Areas contain 64000 Trees larger than Saplings, that means there are 75,920 total trees. Of this 15.7%, or 11,920 are saplings and 35.7%, or 27,100 are Trees less than 6" DBH.

The EIR talks of removing 3,448 non-native trees in San Francisco and replacing them with 3448 Coast live Oak or similar plantings. The additional 11,920 saplings they can remove are already established successful trees. These Monterey Pine, Monterey Cypress and Blue Gum Eucalyptus saplings would grow into much larger trees than the oaks.

The EIR is inadequate because it fails to address the allowed destruction of 11,290 young trees. The significance of these Saplings vastly outstrips that of the replacement trees the EIR says would be planted under the Plan.

It must also be pointed out NAP staff is allowed to cut Trees smaller than 6" diameter at breast height without involving the RPD arborist. There is no 30 day preposting 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 3,448 trees over a 20 year period in San Francisco, this would not be an onerous task. It is about 14 trees per month.

2.2 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.

¹ Nowak "Assessing urban forest effects and values, San Francisco's urban forest" U.S. Department of Agriculture, Forest Service Northern Research Station 2007

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 tree removal and planting records are almost non-existent. Only the Urban Forestry group within RPD operations keeps any records at all. They do not know what they cut or where and they do not know what they planted or where. The NAP keeps no records of tree cutting or tree planting. The following was asked of RPD as a Sunshine request, "RPD must have a record keeping system to track trees that have been removed and trees that have been planted. I would like RPD to provide a copy of tree removal and tree planting records for the past 5 years." The only record provided is shown below.

Tree count July 2015 to Dec 2015				
Pruned	Removed	Planted		Vandalized or Stolen
27	10	27	1	July 15
12	12	17	6	August 15
45	18	24	0	September 15
22	18	30	0	October 15
27	21	15	0	November 15
49	11	21	0	December 15
Total- 182	Total- 90	Total- 134	Total-7	

RPD has no system to track the survival of trees planted. This is true of the Urban Forestry group and the NAP.

A requirement to plant replacement trees in the Natural Areas must be added as a mitigation measure in the EIR. The measure needs to include a recording system to

track the size, type, location, date and health of trees removed. At the same time it should track the size, type, location and date of trees planted. Planted trees should be monitored annually to assess survival/growth versus species and location. Failed trees must be replaced.

Even if the SNRAMP contained language requiring 1:1 tree replacement within the Project area, the Project area is so large that concentrated tree removal in one area with its trees replaced in another area across town, could produce severe results. The southeast part of the City contains a concentration of disadvantaged neighborhoods. It also contains parks with large Natural Areas like McLaren and Bayview Hill. Removing a large quantity of trees from these parks will reduce air quality. **This is an environmental justice issue which should have been considered under CEQA. It was not.**

2.3 Calculation Methodology

The RTC purports to use the calculation methodology incorporated into the “California Emission Estimator Model” (CalEEMod). However, this is not the case. Instead, the authors have made up their own method based on carbon accumulation rates that fails to account for the carbon released from the trees destroyed. At the December 15 Certification hearing, Planning staff explained this debate over the calculation method as a “disagreement of experts”. This is not a scientific debate, this is grade school math. The RTC says $2+2=-1$. The CalEEMod calculation says $2+2=4$. The numbers in the EIR are intentionally miscalculated.

Please note. There is a troubling lack of transparency in the RTC figures. Final numbers are presented, but not the calculations. For this section of the RTC to be credible, the basis for the numbers should have been revealed. A copy of a February 19, 2013 technical memorandum, “Sequestration Study of Greenhouse Gases for SNRAMP” prepared by Chris Sanchez of Environmental Science Associates was obtained from the Planning Department. This document is clearly the source of the misleading calculations but it is not referenced in the RTC. See Appendix B.

The CalEEMod program the EIR refers to was developed to address this situation. Unfortunately, it is an outdated program. The methodology it uses is out of touch with current scientific thought. It assumes all carbon in the removed trees will be released as carbon dioxide. It does not account for the methane release from decomposing trees. Further, it assumes trees stop sequestering carbon at age 20. Actually, trees continue to grow and sequester carbon for 100 years or more. See the Quercus Group document, Appendix A.

CalEEMod grossly underestimates the environmental damage from cutting down trees. However, even using the output for CalEEMod was not enough to produce positive results for the SNRAMP. Let’s look more closely for the sleight of hand. A copy of the “CalEEMod User Guide, Calculation Details” is attached as Appendix C. It clearly shows how land use changes, such as those proposed by the SNRAMP, should be evaluated. The EIR refers to the method, but does not follow it.

RTC Response GG-1 “Greenhouse Gas Emissions” page 4-297

The EIR makes the argument that once trees reach the age of 20 years they cease to sequester more net carbon. The EIR stops here and uses this, and a HortScience report that 90% of the trees in our natural areas are over 20 years old, to say that 90% of the

trees can be removed without any effect on GHG calculations. (see Appendix B) Rather than look at the net release of GHG caused by the project (as is the accepted practice used in CalEEMod), they look at carbon sequestration rate, MT/yr, that would occur in year 20 of the plan. On page 4-298, they say, "CalEEMod calculates GHG emissions based solely on sequestration rates and not based on release of stored carbon". This is completely incorrect. CalEEMod, calculates the total change in stored carbon in converting one landscape type to another. The carbon released from destroyed vegetation is a main factor. See the user guide in Appendix C.



The tree age cited by HortScience is far out of step with reality. For instance, in McLaren Park there are many young trees regenerating the forest. This looks more like the distribution of tree sizes described in the Nowak report cited in footnote 1. See additional forest images in D.

As an example, consider Table 19B on RTC page 4-301. This relates to plans to clear cut 56 acres of forest in Sharp Park and replace it with grassland and scrub. For Grassland plantings it presents "annual sequestration gain (year 20) of 241 MT CO₂/yr. Where does that come from? The EIR says, "Replacement vegetation was assigned a grassland sequestration rate as provided by CalEEMod." That CalEEMod "rate" is not a rate as in MT/yr. It is the amount of CO₂ storage in an acre of mature grassland, 4.31MT CO₂/acre. See page 46 of the CalEEMod user guide in Appendix C. The EIR multiplies this times 56 acres. This should give a value of 241 MT of CO₂ but instead they declare it to be an ongoing capture rate 241 MT of CO₂ per year. This is wrong. They are mixing apples and oranges.

Going back to the accepted methodology contained in CalEEMod. It assumes trees increase in stored carbon for 20 years and then hold a fixed amount of carbon from then on. Fast growing trees have a higher sequestration rate and end up with more carbon at the end of the 20 year growing period. Existing forest land could be 500 years old and still sequester the same amount of carbon per acre because new trees grow to replace the old ones that die. Similarly, grasslands are assumed to reach a static amount of stored carbon per acre. See the explanatory pages from the CalEEMod User Guide, Calculation Details attached as Appendix C.

The CalEEMod calculation is very straightforward. The calculation is simply to compare the carbon stored in the current landscape to how much the new landscape will accumulate in 20 years.

Consider the 56 acres of forest in Sharp Park that is to be converted from forest into grassland. The values used in the CalEEMod calculation are 111 MT CO₂/ acre for forest and 4.31MT CO₂/ acre for grassland. The net emission of GHG due to this part of the SNRAMP would be:

Forest removed			new grassland	
56 x 111	-		56 x 4.31	
6,216	-	241	=	5,975 metric tons of CO ₂ released

This is a number for an average forest. It is based on trees with a sequestration rate of 0.035 MT CO₂/year and a tree density of about 158 trees /acre. However blue gum eucalyptus is not average. According to the SNRAMP (page 3-11), blue gum eucalyptus "is one of the fastest growing trees in the world". A growth rate for eucalyptus is not published in the CalEEMod. Fortunately, the ESA technical memorandum prepared for the EIR, "Sequestration Study of Greenhouse Gases for SNRAMP" does provide a value, 0.12 MT/year/tree. (see page 5 of the memo) Note this sequestration rate is 3.4 times higher than the average CalEEMod tree species.

We can redo the calculation using the information specific to eucalyptus. 15,000 trees will be removed from the 56 acres in Sharp Park, that essentially all are Eucalyptus and (supposedly) most at least 20 years old.(see page 5 of the memo) So, the stored carbon in the trees that would be removed is:

$$15,000 \times 0.12 \times 20 = 36,000 \text{ MT}$$

This means that the SNRAMP activity in Sharp Park would produce a net release of 36,000 – 241 = 35760 MT of CO₂. This does not even include the emissions from the vehicles and equipment used for the logging and for the replanting. Nor does it include the emissions from the wetlands restoration part of the project.

Consider the 3448 Trees the Plan contemplates removing in San Francisco. (RTC page 5-44) According to the RTC these are predominantly blue gum eucalyptus. Over the standardized 20 year growth period, the trees would have stored

$$3,448 \times 20 \times 0.12 = 8,275 \text{ MT CO}_2$$

All of this would be released under the SNRAMP.

Finally, consider the existing 11,920 saplings the SNRAMP would allow to be removed in San Francisco. Were they allowed to grow, they would sequester:

$$11,920 \times 20 \times 0.12 = 28,600 \text{ MT CO}_2$$

In total, the vegetation change contemplated by the Plan would release 44,035 metric tons of CO₂ and prevent the capture of 28,600 metric tons of CO₂ that would otherwise occur. This is a net loss of 72,635 metric tons of CO₂

sequestration. In reality, the situation is much worse because a large portion of the carbon in the trees will actually be released as methane.

If a mitigation measure is added to require 1:1 tree replacement and the replacement trees are coast live oaks we can calculate the outcome. No growth rate is published in the CalEEMod for these trees either. The EIR chooses to classify them as having a medium growth rate. Using the average accumulation rate from CalEEMod, 0.0354 MT CO₂/yr replacement trees, if actually planted, would hold:

$$3,448 \times 20 \times .0354 = 2,441 \text{ MT CO}_2$$

The net loss of carbon sequestration caused by the plan, even if there were replacement trees, would be 70,195 MT of CO₂. This is a Significant Environmental Effect the EIR fails to reveal. Please keep in mind, this is a very understated analysis. It assumes trees only capture carbon for 20 years and only release carbon dioxide as they decompose.

2.4 Forest Management Objectives

The RTC misstates the forest management objectives of the SNRAMP. Pages 4-284 to 4-285 say,

“because the proposed project would replace primarily dead, dying, and diseased trees that have limited capability to sequester carbon or other pollutants for that matter, with young saplings that have long-term carbon sequestration capabilities, the proposed project is expected to result in a net increase in carbon sequestration capacity within the Natural Areas in San Francisco.”

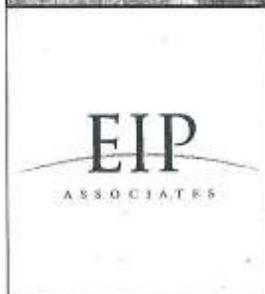
This is not true, trees to be removed under the SNRAMP are not selected based on health, but rather to remove trees in specific areas to open up those areas to promote grasslands. This is a fundamental intent of the SNRAMP. The DEIR page 456 states,

“Further, most of the trees within the Natural Areas are nonnative and most are also invasive. The invasive forests within the Natural Areas are predominantly eucalyptus, although cypress, pine, and acacia also occur (SFRPD 2006). The long term goal in MA1 and MA2 is to slowly convert those areas to native scrub, grassland habitats, or oak woodlands.”

For another example, consider the map of central McLaren Park below. Additional maps are presented in Appendix D. These maps were obtained from the Natural Areas Program by Sunshine requests. They show specific locations for tree removal under the SNRAMP and were the basis for the tree removal numbers presented in the Plan. You can see this is not about culling unhealthy trees. It is about clearing trees from specific areas.

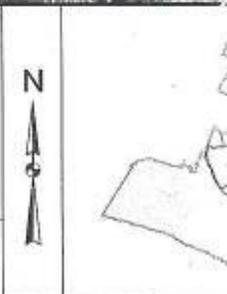
These trees are not selected because they are unhealthy or unsafe. In fact, the Program has a strong incentive to remove the largest healthiest trees to get the most bang for the buck from the allowed number of tree removals. Dead, dying and diseased trees can be removed later on the basis of public safety without being counted under the Program. This public safety excuse has been well used by the NAP to justify tree fellings to date.

The forest management statement in the EIR is not only incorrect, it is a purposeful misstatement of fact.



Source: Management areas and trails data collected by San Francisco Department of Recreation and Park Natural Areas Program (NAP), 2005; trails data digitized by San Francisco State University Institute for GISc (SFSUGIS), 2005; streets data excerpted from Environmental Systems Research Institute (ESRI), Inc.'s StreetMap 2000 data copyright ESRI 1998-2001; aerial photography San Francisco Department of Public Works, 2002, Orthophoto - San Francisco - 1 Foot Resolution - 2001; City of San Francisco Department of Public Works, San Francisco; all data are in California State Plane Zone III projection, NAD 1983; map produced using ArcGIS 9.0 software by ESRI.

Map created May 30, 2005 by Debra Dwyer, San Francisco State University, Institute for Geographic Information Science (SFSUIGIS).



2.5 Tree Definition for Replacement

For what tree replacement does take place, the SNRAMP makes no commitment what will be planted. The SNRAMP and the EIR suggest the new trees to be planted will be coast live oak, California laurel, California wax myrtle and dwarf California buckeye. (RTC page 4-464) Many of the NAP areas did not historically sustain these trees. Even in favorable locations, only a small percentage may ever grow tall enough to escape Sapling status. If we apply the same definition for tree replacement as for tree removal, they may not even qualify as Trees.

The DEIR page189-190 shows that any replacement trees contemplated would not necessarily be trees at all:

“Although the removal of invasive trees would be noticeable, the trees in the San Francisco Natural Areas would be replaced with either native trees or other native vegetation, such as native scrub or grassland species....in some locations, trees would be replaced by native scrub or grassland species...”



Will this “tree”

replace this tree killed by NAP supporters?

Again, a mitigation measure similar to the one put in place for the Beach Chalet Fields should be required. Obviously, the intent of the SNRAMP is to remove certain types of trees. Any replacements would be native trees of a different ecological value. However, the latter two requirements should still apply, that the size of the trees be comparable and that the establishment of the plantings be monitored. Unfortunately, given the restriction imposed by the SNRAMP, that new trees be native trees, the new trees will never grow to comparable size. This can be compensated for by planting multiple native trees for each tree removed. A 3:1 ratio should be required. Such requirements are much more critical for this EIR given the vast quantity of trees at stake.

2.6 Equipment Emissions

The EIR fails to account for the GHG emissions from vehicles and equipment used for tree felling, limbing, chipping, hauling, fence installation, watering, grading etc. associated with implementation. Neither does it account for transportation and equipment emissions associated with ongoing maintenance operations such as weeding, pesticide application, sapling cutting and replanting. Given the number of trees to be removed and the 32 far-flung worksites, these emissions would be significant. The only equipment GHG emissions accounted for by the EIR is for the Sharp Park Wetland Restoration Project. The equipment emissions for all of the other program operations would vastly outstrip this and are not accounted for. See page 4-302 of the RTC.

2.7 Wetland Dredging

The SNRAMP calls for dredging 60,000 cubic yards of mixed mineral/organic material from wetlands at Sharp Park. The EIR does not account for the GHG that will be released when this material is brought to the surface and allowed to decompose.

2.8 Methane

The EIR does not even mention methane. As the trees cut down under this plan decay, the carbon in them will be released in the form of carbon dioxide and as methane. Methane is much more damaging to our environment than carbon dioxide. It has 34 times the Global Warming Potential of carbon dioxide. This EIR cannot be considered adequate when methane release is completely unquantified.

3 Herbicide Use

The RTC page 4-538 says,

“The amount and frequency of pesticide applications as a result of implementation of the SNRAMP would be similar to what currently occurs within the NAP areas and what has occurred over the past 10 years.” In other words, implementation of the Plan will not require pesticide use beyond what is already occurring.

Please note, herbicides are considered a type of pesticide.

Supposedly, the Plan has not commenced. The November 2, 2016 report by the Department of Environment Integrated Pest Management Group, “City and County of San Francisco Agency Responses to the 2016 Request for Information on Future Herbicide Reduction” shows the NAP is the largest user of Tier 1, Most Hazardous, herbicides in RPD.

The Plan calls for a large number of Trees to be cut down. The stumps of all of those will be treated with Tier 1 herbicide to prevent resprouting. This is a new activity requiring pesticide use. When the SNRAMP commences, a large number of Saplings are to be removed during forest thinning, forest removal and in less forested MA-1 and MA-2 areas. All of these stumps will be treated with herbicide to prevent resprouting. This is a new activity requiring pesticide use. When the SNRAMP commences, grasslands will be expanded by removing non-native scrub. This is a new activity that will require herbicide use. All of these new activities will clearly increase pesticide use. The statement in the EIR above cannot be correct.

4 CEQA process violations

In addition to failings of the EIR itself, the process for EIR certification was unlawful. The SF Planning Department and Commission violated sections of the California Environmental Quality Act and of the San Francisco Administrative Code. This regards the process used to move the EIR for the RPD Significant Natural Resource Areas Management Plan from its draft form to certification by the Planning Commission. The most egregious violation is the failure of Planning to recirculate the EIR for comments and responses (Consultation) following the addition of significant new information to the EIR after the close of public comment on the DEIR. This is required by CEQA:

CEQA § 21092.1. ADDITION OF NEW INFORMATION; NOTICE AND CONSULTATION

When significant new information is added to an environmental impact report after notice has been given pursuant to Section 21092 and consultation has occurred pursuant to Sections 21104 and 21153, but prior to certification, the public agency shall give notice again pursuant to Section 21092, and consult again pursuant to Sections 21104 and 21153 before certifying the environmental impact report.

The August 2011 DEIR contained no quantitative analysis of greenhouse gas (GHG) emissions that would result from SNRAMP implementation, other than equipment emissions from the Sharp Park wetlands project. Otherwise, it contained nothing but hand waving arguments. (Grasslands reflect more sunlight than forests in regions where there is snow on the ground for many months of the year.) This was roundly criticized during the comment period for the DEIR.

The November 2016 Response to Comments contains entirely new information regarding GHG emissions. (pages 5-41 to 5-45) Most of the old DEIR arguments were removed. Completely new analysis was added based on newly cited practices and newly generated data. The new information purports to demonstrate that Plan implementation will result in a net reduction in GHG emissions. It is important to vet this seemingly impossible outcome since Plan implementation will obviously produce extensive GHG emissions resulting in a Significant Environmental Impact.

After adding this new information to the EIR, Planning did not circulate the EIR for Consultation as required by 21092.1 above. Done correctly, Planning would have made the amended EIR available for public review. They would have accepted public and agency comments and then created a new Response To Comments (RTC). The new RTC would have addressed concerns over the validity of the new information.

Other significant new information was added to the EIR following the close of consultation. One was the new conclusion that Plan implementation will not require an increase in pesticide use over current levels. See RTC page 5-40 A huge new section was added regarding mitigation measures to deal with acidic soils at Laguna Salada in Sharp Park. See RTC pages 5-4 to 5-8.

Other code violations by Planning in the execution of this process include:

San Francisco 67.15 (b) Every agenda for special meetings at which action is proposed to be taken on an item shall provide an opportunity for each member of the public to directly address the body concerning that item prior to action thereupon.

The certification hearing for the RPD SNRAMP EIR was held on December 15, 2016. The agenda for the hearing can also be found at: <http://sf-planning.org/meeting/planning-commission-december-15-2016-agenda>

The Planning Commission combined its certification hearing of the EIR with the Rec and Park Commission hearing on adoption of the SNRAMP. The hearing contained two agenda items, strangely noted as 1a and 1b. These are two entirely different decisions, made by two different commissions based on two different sets of input information. The Planning Commission action is to assess the technical conformance of the EIR to CEQA regulations and if it is acceptable, to certify it. The Rec and Park Commission is to consider the information contained in the certified EIR and decide whether or not to adopt the Plan in light of its environmental impacts. Despite this, they held the meeting as if only one item was on the agenda. All testimony by Planning and RPD was given, followed by all public testimony on both decisions. When all that was completed, the Planning Commission voted to certify the EIR and the Rec Park Commission voted to adopt the plan. All of the public testimony was mixed together randomly. It lasted for about 5 hours. About 10% of the comments were directed to EIR certification. Members of the public were only allowed to testify once.

There are two 67.15 (b) issues here.

1) This way of conducting the hearing is legalistically in compliance with 67.17 (b). However, it circumvents the intent of the Code. The Planning Commission should have heard testimony on the EIR and made their decision on certification. Then the Rec Park Commission should have heard testimony on the SNRAMP and made their decision on adoption of the SNRAMP. We asked the Planning Commission if they would at least separate the testimonies on the EIR from testimonies on the SNRAMP. They said they chose not to. The effect was to fragment and dilute public testimony on the EIR. The public's ability to convey information to the Planning Commission was stifled as a result.

2) Members of the public were only allowed to speak once. There were two distinct agenda items at the hearing. Numbering them as 1a and 1b does not erase that fact. If you choose to speak on the EIR and then you could not speak on the SNRAMP. They will say people could have split their time in half and spoke a little bit about both. Doing that would have diluted their messages and made them less intelligible.

San Francisco 31.15 (d) When the final EIR has been prepared and in the judgment of the Planning Commission it is adequate, accurate and objective, reflecting the independent judgment and analysis of the Planning Commission, the Planning Commission shall certify its completion in compliance with CEQA. The notice of the Planning Commission hearing on the certification of the final EIR shall inform the public of its appeal rights to the Board of Supervisors with respect to the final EIR within the time frame specified in Section 31.16 of this Chapter. The certification of completion shall contain a finding as to whether the project as proposed will, or will not, have a significant effect on the environment.

The certification of the EIR is supposed to be an unbiased technical decision by the Planning Commission. Is the EIR "adequate, accurate and objective, sufficient as an informational document, correct in its conclusions, and reflects the independent judgment and analysis of the Planning Commission". The Planning Commission chose to structure the hearing to immerse themselves in testimony for and against the SNRAMP before making their certification decision. 90% of the testimony they heard

was of this sort. Why would this be relevant if they are trying to make an unbiased decision on the technical merits of the EIR? Clearly, they see the certification decision as a political one, biased by other factors than those they are supposed to be considering.

San Francisco 31.15 (d) ...The notice of the Planning Commission hearing on the certification of the final EIR shall inform the public of its appeal rights to the Board of Supervisors with respect to the final EIR within the time frame specified in Section 31.16 of this Chapter....

The Administrative Code requires that the hearing notice inform the public of its rights to appeal the certification. The notice did not contain the required information.

San Francisco 67.7 (g) Each policy body shall ensure that notices and agendas for regular and special meetings shall include the following notice: KNOW YOUR RIGHTS UNDER THE SUNSHINE ORDINANCE (Chapter 67 of the San Francisco Administrative Code)

The notice for the hearing did not include this required information.

Based on these procedural issues alone, the certification of the EIR should be rescinded and Planning required to recirculate the EIR for Consultation. Once the new RTC is completed, the Planning Commission must conduct the certification process in compliance with CEQA and our local ordinances.

5 The SNRAMP does not disclose the full extent of planned trail closures and so the EIR is not evaluating the correct Plan.

The SNRAMP does not accurately reflect the extent of trail closures actually planned by the NAP. In most of the parks where the NAP has violated CEQA and moved forward with implementation of the SNRAMP, trail closures have been more extensive than disclosed in the SNRAMP. The table below compares the footage of trails to be closed under the SNRAMP versus what has actually been closed.

	Trails Existing per SNRAMP	Trails to be closed per SNRAMP	Trails additional actually closed	Trails actually remaining	Trails Percent closure per SNRAMP	Trails percent closure actual
Glen Canyon	23251	3173	5515	14563	14%	37%
Bayview	4610	1752	1607	1251	38%	73%
Twin Peaks	9400	2779	3736	2885	30%	69%
Billy Goat Hill	2660	598	1412	650	22%	76%
Hawk Hill	1639	702	937	0	43%	100%
Grandview	1893	239	627	1027	13%	46%
Corona Heights	6230	1589	1896	2745	26%	56%
total	49683	10832	15730	23121	22%	53%

Note, there is a discrepancy in the Bayview Hill numbers. The SNRAMP includes the length of the road. This is not in the Plan area. It has been removed from the numbers above.

So, the Natural Areas Program has been closing about 2.5 times the amount of trails than what is disclosed in the SNRAMP. The EIR cannot be valid because it is not evaluating the actual plan of the Natural Areas Program.

See Appendix F for more detailed information on the trail closures to date.

6 Tree Replacement

We noted in section 2.2 the DEIR and the RTC make the unwarranted assumption that removed trees will be replaced, that the replacement will be on a 1:1 basis, that the replacements will be trees and that the replacement trees will be planted in the project area. These assertions are not supported by any language in the SNRAMP.

This is not just a critical issue for greenhouse gas emissions. A reduction in the number and size of trees in the project area also impacts air quality, aesthetics, wind and hydrology. All of the following sections of the DEIR and RTC hinge on the tree replacement premise.

DEIR

III.E.5	Management Practices
Impact LU-7:	Implementation of programmatic projects under the SNRAMP would not have a substantial impact upon the existing character of the vicinity. (Less than Significant)
Impact AE-1:	Implementation of programmatic projects under the SNRAMP would not have a substantial adverse effect on a scenic vista. (Less than Significant)
Impact WS-1:	Implementation of the programmatic projects under the SNRAMP would not result in significant ground-level wind hazards and windthrow risks. (Less than Significant)
Impact BI-2:	The SNRAMP and implementation of programmatic projects under the SNRAMP would have a substantial adverse effect on special status bird species. (Less than Significant with Mitigation)
Impact AF-4:	Implementation of the programmatic projects under the SNRAMP would not have a substantial adverse effect on the loss or conversion of farmland or forest land. (Less than Significant)
VII.B.2 Impacts	Wind and Shadow
VII.B.2 Impacts	Hydrology and Water Quality
VII.D.2 Impacts	Wind and Shadow

RTC

Response PD-3	General opposition to the project
Response PD-34	Elimination of 18,000 trees
Response LU-4	Applicability of San Francisco Urban Forestry and Landmark Tree Ordinances
Response AE-1	Aesthetics [AE]
Response CP-8	Impacts of tree removal on historic Mount Davidson Area
Response CP-9	Inadequate/Incomplete HRER for Mount Davidson

Response AQ-1	Increased pollution from tree removal activities
Response BI-12	Tree removal at Mount Davidson
Response BI-30	Impacts related to the removal of nonnative trees and invasive vegetation
Response BI-33	SNRAMP proposals for tree replacement
5.A.3 Chapter III:	Project Description
5.A.12 Chapter VI:	Other CEQA Issues
5.B.3 Section V.B:	Project Description

A mitigation measure must be put in place to record data on the trees removed, trees planted and the survival of the planted trees.

7 Implementation before Certification

The NAP has been flagrantly violating CEQA, moving forward with the Program before EIR certification. The EIR denies this, despite the many examples.

RTC Response G-3 page 4-20 With respect to bond monies spent in various parks says,

“It is possible that some of these monies could be used for management actions and improvements proposed under the SNRAMP, but no physical improvements could be accomplished unless and until this EIR is certified by the Planning Commission.”

It goes on to say the NAP “provided fencing for public safety” as part of the Glen Canyon Restoration Project. In fact, only a small percentage of the fence installed on that project was for public safety. The remainder was for public access control. The EIR does not mention the extensive trail closures implemented under that project.

In 2002 the Board of Supervisors issued resolution 653-02 requiring the RPD halt implementation of the Natural Areas Plan until a final plan was approved. That plan is the subject of the EIR before you. The resolution clearly defines the difference between implementing the plan versus a holding pattern for the Natural Areas Program.

FURTHER RESOLVED, That until the Natural Areas Management Plan is completed and approved by the Board of Supervisors, the Natural Areas Program may continue to preserve and maintain genuine remnants of San Francisco's native flora and fauna so long as those activities do not include:

Removal of healthy trees that pose no safety hazards

Trail closures, or restrictions on access and recreation

Trapping and removal of wild or feral animals currently inhabiting parks and lakes

Expansion of activities into areas that no longer support predominantly native flora and fauna

We have clear information from CEQA and additional guidance from the Board of Supervisors about what amounts to plan implementation prior to EIR certification. **RPD has been violating CEQA and the BOS resolution.** Violations include the following:

-Closure of trails

-Installation of public access control fences

-Installation of signs restricting the public to “designated” trails making it illegal for park goers to use “un-designated” trails and making off-trail use illegal.

-Installation of signs prohibiting people from riding bicycles, or even walking bicycles into Plan management areas.

-Removal of healthy trees.

-Establishing new native plant gardens in areas that no longer supported predominantly native flora.

Below is a detailed listing of these violations:

Citywide

- Signs have been placed in almost all parkland managed by the NAP that say, “Stay on Designated Trails. No Bicycles.”

Glen Canyon Park

- The NAP closed 8,688 feet of trails since 2006.
- Extensive fencing intended to discourage public access was erected at many locations in the park. The SNRAMP EIR claims RPD “provided fencing for public safety” when in fact only about 153 feet of fence was installed for public safety. The remaining 680 feet of split rail fence was installed purely for public access control.
- a fenced native plant garden was added in SNRAMP zone MA-3b that did not previously support predominantly native flora. The SNRAMP criteria for MA-3 areas includes the “absence (current or historic) of sensitive plants”

Mt. Davidson

- As part of the Mt. Davidson Seismic Tank upgrade by the SFPUC in 2008, the NAP insisted that the water pipeline from the Stanford Heights Reservoir to the tank on Mt. Davidson be relocated from its existing location among shrubs and grass to the forested area. This required clear cutting a swath of healthy trees up the face of the mountain.
- In about January 2014 the trail below the lower saddle viewing area on the east side of the park was blocked off with felled trees and limbs. More trees and limbs have been added since.
- In October 2015 the trail that runs north from the cross down to the open plateau and rocky knoll was blocked off with felled trees and limbs. This is a historic WPA trail with extensive stone work. One staircase was stuffed full of tree limbs. In the summer of 2016, in the same area, two staircases constructed with wood treads were ripped out. The steel spikes that had held the treads were left protruding from the ground.

McLaren Park

- Multiple trails have been closed in the area south of Mansell and west of Visitacion.
- Fencing was installed at the Visitacion overlook parking area to prevent people from walking out onto the knoll above Visitacion Valley.
- The trail that runs along twin water tanks fence line was closed.
- Native plantings were extended into areas that did not support predominantly native flora and fauna under the McLaren Park Connector Trail Project. Plantings were established at the Persia, Campbell and Visitacion entrances. The Persia and Campbell sites are classed MA-3, “absence (current or historic) of sensitive plants“. The project plan for the Persia site indicates a large healthy tree at the south end of the project site is to remain. That tree has disappeared. The fencing for the Campbell site blocked the trail running north from the sidewalk intersection. That was subsequently removed by the public. The Visitacion site is classed MA-2, still not an area that “supports predominantly native flora“. The project plan for the Visitacion site indicates 2 healthy trees at the SW corner of the project. One of them went missing.
- Based on numbered stumps, one hundred trees were cut in the summer of 2014 in conjunction with the Visitacion trail restoration project. The 2012 HortScience McLaren Park Tree Risk Assessment report only identified 26 trees in the project area that should have been removed.

Pine Lake

- Fencing has been erected around the lake to limit public access.

Twin Peaks

- The NAP has active plans to close trails on Twin Peaks under the Figure 8 project. These trail closures, in conjunction with the "stay on designated trails" signage, will effectively close the two southern lobes of Twin Peaks to the public. See: http://sfrecpark.org/wp-content/uploads/TwinPeaksMeeting2_11.02.11.pdf Trail closures are faintly marked on pages 33 and 34. The trail that runs down the South lobe was closed in August/September 2016.

India Basin Shoreline Park

- The coastline of the SE parcel of the park at the foot of Arelious Walker Street has been made off limits to the public. Permanent fences were erected and signs posted that say "Wildlife Area No Access."

Bayview Hill

- Split rail fencing has been installed under the Bayview Trail Improvement Project that closes off the north-west quadrant of the park. The gate in the steel fence has been locked, closing off the south-west quadrant of the park to the public.

Bernal Hill

- The trail on the NE end of the park just east of Folsom St has been blocked. It is the easiest, most sustainable route up onto the hill along the entire north face. The NAP has active plans to close additional trails under the Bernal Heights Park Trails Improvement Project.

Also see Appendix F. It shows the trail closures planned under the SNRAMP and also shows which trails have been closed by the NAP since work was started on the EIR in 2005. The footage of access control fencing installed in each area is given. These trail closures and fence installations are all CEQA violations.

The Recreation and Parks Department should be admonished for violating CEQA. Where practical, these violations should be cured. No further violations should be allowed until this EIR is corrected, certified and the Plan adopted by the Recreation and Parks Commission.

8 Bicycle Prohibition

The SNRAMP hints that its drafters consider bicyclists to be a problem, but does not state any broad action that would be taken to restrict bicycle use in Natural Areas. However, in early 2015, the NAP erected signs prohibiting the public from bringing bicycles into Natural Areas. (See the sign photo in section 1.) The NAP is only allowing bicycles on a few trails by special exception. Prior to the posting of these signs, RPD regulations permitted bicycles on all trails unless signs were posted forbidding them. There were no such signs in the Natural Areas when the new signs were installed. See the discussion in Appendix G.

This hidden agenda of the NAP was not disclosed in the SNRAMP and the idea that the implementation of the SNRAMP would bar people from walking their bikes or riding them in NAP managed parklands is incorrectly addressed by the RTC.

Not only does the prohibition prevent people from riding their bicycles in our parks, it prevents them from riding their bicycles to our parks. You cannot expect people to lock their bicycles at park borders and leave them while they spend time in the park. Bike theft is just too rampant. **This bicycle prohibition flies in the face of City initiatives including Green Connections, Transit First and the ROSE.**

RTC Response PD-6 "Opposition to the proposed public access restrictions" page 4-146 claims,

"The SNRAMP does not propose changes to bicycle use in the Natural Areas."

This is not true. Prior to the NAP's premature implementation of the SNRAMP, bicycles were allowed anywhere in Natural Areas unless specifically prohibited. In 2015, the NAP blanketed the Natural Areas with signs prohibiting riding or walking bicycles in Natural Areas.

Response RE-10 "Recreational analysis related to trails" page 4-339

"The SNRAMP does not single out bicyclists as a concern and does not include actions directed specifically at bicycle use. Off-road bicyclists would be affected by proposed trail closures similarly to other trail users, such as hikers and runners."

That is incorrect. The NAP allows all other users on Designated Trails while people with bicycles are forbidden to enter Program areas at all.

The RTC fails to address this important issue and misstates the facts.

9 Aesthetic Impact of Fences

The NAP's implementation of the SNRAMP in advance of the EIR demonstrates that the use of fences will be much more extensive than what is disclosed in the SNRAMP.

Recommendation GR-11C in the SNRAMP says, "If off-trail use continues in a particularly sensitive habitat (e.g., wetlands), permanent fencing shall be considered as a last resort once all other options, including enforcement, have failed." In fact, the NAP has installed vast quantities of fencing that have a Significant Environmental Effect on Aesthetics. The EIR only discusses the aesthetic impact of the seawall fence at Sharp Park. The impact of fences in other areas is not addressed.

Parks particularly hard hit with fences are Corona Heights, Grandview and Glen Canyon where fences are now dominant features of the landscapes. Here is a tabulation for parks that have benefited from "improvement" projects.

Bayview Hill	430 feet	Chainlink fence installed some time ago, but gate now locked
	80 feet	splitrail fence installed since 2005
Corona	936 feet	splitrail fence installed since 2005
Heights	500 feet	low wire fence (not the old chainlink fence for public safety)
Glen Canyon	680 feet	splitrail fence installed since 2005

80 feet plastic on metal posts installed since 2005

Grandview 856 feet splitrail fence installed since 2005

See the fence photos in Appendix H.

The effect of fences on Aesthetics is a Significant Environmental Effect not addressed by the EIR.

10 Bias

The EIR contains a surprising number of statements that are not true. Their inclusion indicates bias by the drafters of the document.

- A Response GG-1 and its supporting technical memorandum, "Sequestration Study of Greenhouse Gases for SNRAMP" discussed in Section 2.3 are wrong. Given the author's "expert" status, one can only assume the faulty GHG accounting method was intentionally presented.
- B HortScience, a frequent beneficiary of NAP contracts, was asked to author a very unscientific paper in January 2013 titled, "Age of blue gum in San Francisco's Natural Area Parks". This report is cited by ESA in their carbon sequestration memo and used to support the false GHG calculations that appear in the EIR.

HortScience cites their assessment of 800 blue gums larger than 6" diameter, with a median size larger than 20" diameter to make the statement that, "Given my observations of blue gum in Glen Canyon, McLaren, Mount Davidson and Pine Lake Park, I estimate that at least 90% are more than 20 years old." Obviously, given the large trees Mr. Clark was examining, they were indeed more than 20 years old. Given the title of the document, you would think these statements were referring broadly to all trees in our Natural Areas, but the writing allows the possibility he was referring to only the large trees he was assessing.

HortScience never actually studied the parks with the intent to determine the mix of tree ages. Their work included no assessment of smaller trees. The only evidence presented about the quantity of young trees is:

-a paper from Dr. Joe McBride from 1994 related to some specific stands in the Presidio and Golden Gate Park.

-an examination of Google Earth historical photos from which he somehow deduces that there are very few young trees in our forests.

-finally the author says young trees observed at the edges of the stands examined were not common. (That is a recollection of something the author was not specifically looking at when he was in the parks.)

HortScience must know there is a high percentage of young trees in our natural areas. The language of this memo is intentionally ambiguous to give the impression the author is saying 90% of the blue gums in our natural areas are more than 20 years old, when the legalistic meaning is that 90% of the trees HortScience specifically assessed were more than 20 years old.

Please see the photos in Appendix E. These were taken in various natural areas that show the mix of trees that actually exist.

C The HortScience report only dealt with observations of a few parks in San Francisco, yet the EIR specifically cites it to claim that 90% of the trees in Sharp Park are more than 20 years old. There is no connection. RTC Footnote 76, page 4-300

D Impact of removing benches and recreational amenities

The response to comments about the removal of benches from Natural Areas, RE-11 page 4-340 contains an outright lie,

“In 2011, SFRPD removed a bench on the northern portion of Mt. Davidson because it was rotting and unsafe for sitting. “ The truth is revealed in the email below sent by Chris Campbell of the NAP. The bench was not rotting and unsafe. It was removed because people liked it and used it.

To: jacquieproctor@hotmail.com
CC: chuck@paskerian.com; Lisa.Wayne@sfgov.org
Subject: Re: Bench missing on Mt. Davidson
From: Christopher.Campbell@sfgov.org
Date: Thu, 27 May 2010 08:42:45 -0700

Hello Jacquie,

The bench that you're referring to was installed by the Recreation and Park Natural Areas Program. It was installed a number of years ago on this site to take advantage of the views, beauty and serenity of the plateau. We monitored the use of the bench and it unfortunately became an attractive nuisance. The secluded location was a draw for night time drinking and smoking. Bottles were thrown down the hill slope and most often broke, causing a hazard for both animals and people. Secondly the bench became a draw for commercial dog walkers, at times with more than 12 dogs in the area at once. This activity resulted in trampling of this sensitive slope, disturbance of wildlife and the creation of trails around the bench. One of the trails remains in the grassland below the bench location. After consideration we concluded it was best to remove this bench.

Over the coming year we will evaluate the installation of benches city-wide. This will be done in correlation with a natural areas trail project . Due to the activities associated with this bench we unfortunately do not have intentions to re-install one on the lower plateau at Mount Davidson.

Sorry for the disappointment this may bring,
Christopher

Christopher Campbell
Natural Areas Program

- E Closure of the Miraloma trail in Glen Canyon, Comment LU-2 page 4-214
In Glen Canyon the only sustainable trail on the entire west side of the park was closed. This runs from O'Shaughnessy Blvd. down to the Silver Tree Camp.

Response LU-2

"The trail to which the commenter refers (at the entry to the park from O'Shaughnessy Blvd.) was closed prior to the commencement of the environmental review for the SNRAMP. This unofficial path was deemed unsafe, due to a significant presence of poison oak. A low post-and-cable fence was installed near Silver Tree camp and day care center to discourage use. This trail closure is not part of the SNRAMP project and thus was not analyzed in the EIR."

This is a fabrication. The trail closure is part of the SNRAMP. The trail is shown on the SNRAMP Glen Canyon map as an existing trail slated for closure. (SNRAMP page 6.3-24) The bottom of the trail was closed with a split rail fence after 2011. The trail itself is not hazardous. The NAP could easily control the poison oak along the trail if they wanted to. They simply want to exclude the public from the west side of the park.

Not only is this trail closure planned under the SNRAMP and subject to this EIR, it was still indicated as an existing trail under the Glen Canyon Trails Improvement Project published in July 2011. It clearly shows this trail as one they plan to close under that project.

<http://sfrecpark.org/wp-content/uploads/GlenCanyonTrailconceptplan.pdf>

F Forest Management Objectives

As noted in section 2.4 of this document, the EIR willfully misstates the forest management objectives of the SNRAMP. This occurs on pages 4-284 to 4-285 of the RTC. It is amazing the authors would try to pass off such a bald lie involving the fundamental purpose of the SNRAMP tree removals.